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POSITIVE PROGRESS TUITION



41a Mill Lane

West Derby

Liverpool

L12 7HZ

**Policies Handbook**

**Updated June 2022**

## Includes COVID-19 Policy

### Core values

The company is committed to achieving the best standards in every aspect of its business activities, thereby providing the customer with an efficient service and products.

The company philosophy is to involve staff at all levels in achieving its objectives. All staff are encouraged to actively participate in a continual programme of improvements.

We also have beliefs about the way we should work in order to achieve our ambition successfully. Paramount amongst those beliefs is the idea that we should strive for the best standards in everything we do.

Here are the values and qualities that guide our work:

1. We are one team where everybody takes personal responsibility and pride in their actions:
   1. Treat others with respect at all times.
   2. Celebrate and share success.
   3. Share knowledge, offer help and ask for help if needed.
2. We hate waste of any kind:
   1. Question or challenge if you notice things that waste time, energy, resources or money.
   2. Look for opportunities to reduce waste and put your ideas forward.
3. We work in an open and honest environment where everybody’s views are valued:
   1. Listen to and respect others’ ideas and opinions.
   2. Praise good ideas more than criticise.
   3. Keep your promises.
   4. Say ‘Thank You’.
4. We encourage everybody to maximize their potential:
   1. Understand your objectives.
   2. If we can help your personal development – we will. If you feel you need it, ask for training. We hold a Continuous Development Plan (CPD) record for each individual to monitor and assist in learning and development.
   3. If you can help others to develop – do so.

#### Ways of working

A common-sense approach is nothing new and much of it seems obvious – chances are that you’ll be doing most of the right things already. But here are a few common-sense guidelines that will help improve our working environment and present a professional image to visitors. They will also help us understand each other better and work together more effectively.

**‘Tidy-as-you-go’** – correctly clean up any spillages, dispose of any rubbish as you work. Don’t create one big ‘tidy-up’ job for later for one person when a correctly followed ‘tidy-as you-go’ policy would eliminate this. Covid-19 standards required.

**Wastage** – we maintain a policy of ‘minimum waste’ which is essential to the cost effective and efficient running of our business. You are able to promote this policy by taking extra care during your normal duties by avoiding unnecessary or extravagant use of services, time, energy etc. The following points are illustrations of this:

* 1. Handle machines, equipment and stock with care.
  2. Turn off any unnecessary lighting and heating. Keep doors closed whenever possible and do not allow taps to drip.
  3. Ask for other work if your job has come to a standstill.
  4. Start with the minimum of delay after arriving for work or after breaks.

The following is an express term of your contract of employment:

* 1. Any damage to stock or property (including non-statutory safety equipment) that is the result of your carelessness, negligence or deliberate vandalism will render you liable to pay the full or part of the cost of repair or replacement;
  2. Any loss to the company that is the result of your failure to observe rules, procedures or instruction, or is a result of your negligent behaviour of your unsatisfactory standards of work will render you liable to reimburse the company the full amount or part of the cost of the loss; and

In the event of failure to pay, we have the contractual right to deduct such costs from your pay.

**Stock** - Don’t leave part boxes of stock on and around the table when not in use. Put these things back where the next person will be able to successfully find them.

**Report any hazards** – alert management to any dangers in the workplace ASAP so that they may act as necessary.

**Think of others** – work with others in mind at all times. Make products easy to get at when putting away new stock, keep walkways clear, make stock rotation clear so that everyone knows which box/stack to take from first, and try to keep products in the same place to avoid confusion.

##### General

It is everyone’s responsibility to prevent the theft or damage of goods, company property or resources from the business.

The security rules are designed to minimise the risks of loss and your fullest co-operation in implementing, maintaining and improving our procedures is required. These rules and procedures are also designed to protect you. Failure to follow the security rules may on its own lead to the inference that you have acted dishonestly.

If you notice anything suspicious, report it to a member of the management team or another available member of management as soon as possible. Any suggestions for improvements in the security procedures are always most welcome – these should be taken up with your A member of the management team in the first instance.

##### Building Security

Please check that windows and doors are locked before leaving the building.

##### Housekeeping

Both from the point of view of safety and of appearance, work areas must be kept clean and tidy at all times.

##### Behaviour Outside of Work

Because Positive Progress Tuition demands employees of the highest integrity, we have the right to expect you to maintain these standards outside of working hours. This includes behaviour in your private life, whilst wearing company clothing when travelling to and from work and / or shopping.

Activities that result in adverse publicity to the company, or which cause us to lose faith in your integrity, may give the company grounds for your dismissal.

##### Changes in Personal Details

You must notify the company of any change of name, address, telephone number etc. so that we can maintain accurate information on our records and contact you in an emergency, if necessary, outside normal working hours.

If you require any further information or have any questions about the company, please contact:

Margaret Rude

Centre number: 0151 226 2749

Mobile: 07804 880811

Email: enquiries@positive-progress.co.uk

### Safeguarding Children Policy

#### Safe Recruitment & Selection

We have a policy and procedure which ensures that all potential staff:

* Complete an application form or letter of application. This includes: address, evidence of relevant qualifications, the reasons why they want to work with children, paid work and voluntary work experience and all criminal convictions.
* Provide two pieces of photographic identification which confirm identity. If unable to provide two pieces of photographic identification, full birth certificate and one photographic identification may be accepted.
* Provide one piece of identification to confirm proof of address. Acceptable documents include: Utility bill (no more than three months old; bank statement (no more than 3 months old); council tax statement (not more than a year old); DBS certificate.
* Undergo an interview (formal or informal) involving at least two interviewers.
* Provide at least two references which are followed up before a post is offered. One reference is from the last employer or organisation that has knowledge of the applicant’s work or volunteering with children. If the applicant has not worked with children before, then they should confirm this and give an alternative referee.
* Consent to a Disclosure and Barring Service (DBS) check at the appropriate level (standard or enhanced). DBS Disclosure checks should be approved by a manager.
* New staff awaiting a DBS Disclosure are supervised by a member of staff who holds an enhanced DBS Disclosure check approved by a manager.
* New staff awaiting a DBS Disclosure complete a self-disclosure form declaring details of any criminal convictions or convictions pending. This includes any ‘spent’ convictions.
* As a representative of Positive Progress Tuition (confirmed contract or self-employed basis) each person is responsible for the cost of a DBS certificate.
* The pay date is the 15th of each month and will be paid via bank transfer. The pay date is from the previous month from the 1st to the end of the month. Reports for timesheets will be generated via the sign in app. It is your responsibility to ensure you sign in and sign out to ensure your paid for your worked hours.

Furthermore, the Company complies with all other safeguarding regulations introduced in February 2010:

* We understand that a person who is barred from working with children or vulnerable adults is breaking the law if they work or volunteer or try to work or volunteer with these groups.
* We understand that an organisation which knowingly employs someone who is barred to work with those groups will also be breaking the law.
* We understand that if our organisation dismisses a member of staff or volunteer because they have harmed a child or vulnerable adult, or would have done so if they had not left, we must tell the Disclosure and Barring Service:

<https://www.gov.uk/government/organisations/disclosure-and-barring-service>

#### Management & Support of Staff

* All staff are provided with a job description outlining their main responsibilities. This includes a requirement to comply with our safeguarding policy and procedures and ground rules for appropriate behaviour.
* All staff complete a role review at the end of their induction period before being confirmed in post. (6 months)
* All staff are given supervision at least every 6 weeks by their line manager.
* All staff attend regular on-going safeguarding training appropriate to their role.
* All staff receive an induction, which includes information on all the Company’s policies and procedures.

#### Computers

• All computers used by students are equipped with ‘parental controls’ to ensure safe internet use.

#### Bullying

Bullying will not be tolerated. All forms of bullying will be addressed. Bullying can include:

* Physical pushing, kicking, hitting, pinching etc.
* Name calling, sarcasm, spreading rumours, persistent teasing and emotional torment through ridicule, humiliation and the continual ignoring of individuals.
* Sectarian/racial taunts, graffiti and gestures.
* Sexual comments and or suggestions.
* Unwanted physical contact.

Students from ethnic minorities, disabled students or those with learning difficulties are more vulnerable to this form of abuse and may become a target.

Everybody has the responsibility of working together to stop bullying. Anybody who reports an incident of bullying will be listened to carefully and will be fully supported, whether it’s a child/young person being bullied or the child who is bullying. A bullying report form will be completed upon being reported and appropriate action taken.

Any reported incident of bullying will be investigated objectively and will involve listening carefully to all those involved.

Students being bullied will be supported and assistance given to uphold their right to play and live in a safe environment which allows their healthy development. Those who bully will be supported and encouraged to stop bullying.

#### Resolving Problems

We believe that clear, open and fair procedures for the resolution of problems are necessary both for the success of the Company and for the fair treatment of all our team.

### Rights of Search

Although we do not have the contractual right to carry out searches of employees and their property (including vehicles), whilst they are on our premises or business, we would ask all employees to assist us in this matter should we feel that such a search is necessary.

Where practicable, searches will be carried out in the presence of a colleague of your choice who is available on the premises at the time of the search. This will also apply at the time that any further questioning takes place.

We reserve the right to call in the police at any stage.

#### Covid-19 Health and Safety Policy

We are reopening Positive Progress Tuition Centre in line with schools returning from 1st June 2020. We will continue to offer our online service to our families where they choose this to be the best option for them or, if after viewing our COVID-19 Management Strategy, parents still feel they would rather their child continued to work from home.

These processes are reviewed regularly. Please be assured that we place the health and safety of all our students and staff at the forefront of any plans to reopen. Where the climate and data tells us it is not safe, we will not reopen. Should another wave of COVID-19 occur we will close the centre and return to the online format.

We welcome feedback from parents and all staff; any comments or suggestions which you feel may help

us improve our families safety will be taken on board and put into our strategy if appropriate and within the feasibility of us implementing them.

Our COVID-19 Management Strategy

1. Parents will be given the option of continuing with online tuition or coming into the centre.
2. At 57 minutes past the hour an Alexa announcement will made to all classrooms informing tutors and ta’s of the time and that they should now start gathering together their booklets and homework folder and be ready to be escorted down to the front door or to their next session socially distanced.

1. Students will bring only the equipment and workbags that they need for that session into the centre.

1. Where parents bring their child to the centre: Parents must wait outside when they arrive at the centre socially distanced in the courtyard and then wait until a staff member is available for their child to enter the building safely with mask and/or visor on and hand sanitation, temperature check before the child signs in.

1. To ensure safeguarding of students, parents must watch and wait until their child has entered the building and been met by an administrator or member of management.

1. On leaving the premises we will observe for which parents are there to collect their child.

Parents should come to the gate to receive their child from a member of staff.

1. Students who make their own way to the centre must wait outside in the courtyard area at the front of the centre (observing social distancing rules) until a member of staff calls them into the centre.

1. Masks are to be worn by staff and students for their sessions, visors are also appropriate to wear if staff or students feel this is appropriate for them.

1. Students will drop their used visors into a box at the bottom of the stairs. No face visors will be reused by students unless they have been thoroughly cleaned.

1. All staff must ensure all equipment (desks, chairs, door handles, bannisters, etc) to be cleaned after each session with appropriate cleaners.

1. Students will be directed into and out of classrooms to minimise social contact by a member of staff at start and end of each session.

1. No crossing on stairs will be allowed.

1. Students will not be allowed out of class for the toilets during their session, must go before their session starts and wash hands thoroughly.

1. Classrooms: Loft space – 3 tables/max 6 students/max 3 staff;

Early Learners rooms 3 tables/max 6 students/max 2 staff

KS2/3 classroom/Library - 2 tables/max 4 students/max 2 staff

1. No waiting area for parents inside the building.
2. Students to bring all their own pencil case that is wipeable.

1. Students must sanitize hands on entry and exit from the building.

1. Alcohol-based hand sanitizer to be supplied for each table in each classroom.

1. Reception and front of house area will have hand sanitizers for cleaning of hands on entry to the building.

1. Reception area and outside building a minimum of 1 metre social distance should be applied at all times - 1 person in 1 person out rule at all times - no waiting in reception area.

1. Hand sanitiser wash policy for all learners as entering building followed by hand sanitising before leaving the classroom.

1. Staff seating min 1 metre apart in classes and offices.

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| **What the government guidance says:** | **What we will do:** |
| * Minimising contact with individuals who are unwell by ensuring that those who have coronavirus symptoms, or who have someone in their household who does, do not attend childcare settings, schools or colleges | * Parents must ensure that children only take part in online sessions where there are symptoms in their immediate household no matter how minor |
| * Cleaning hands more often than usual – wash hands thoroughly for 20 seconds with running water and soap and dry them thoroughly or use alcohol hand rub or sanitiser ensuring all parts of the hands are covered | * Students must wash hands before coming to the centre and use hand sanitisers provided upon entry to the building and in the classrooms. * Cleaning stations set up in each classroom for each tutor/ta with kitchen roll, antibacterial wipes, antibacterial spray, hand sanitiser |
| * Ensuring good respiratory hygiene by promoting the “catch it, bin it, kill it” approach | * Catch it, Bin it, Kill it posters in all classrooms * Masks and visors to be worn (unless exempt) by all staff and students * Bins to be provided in all classrooms |
| * Cleaning frequently touched surfaces often using standard products such as detergents and bleach | * All tables and chairs to be wiped down after each session * Bannisters and touchpoints to be wiped down after all sessions * Students are not to remove visor or mask before leaving the centre |
| * Minimising contact and mixing by altering, as much as possible the environment (such as classroom layout) and timetables (such as staggered break times) | * 1 member of staff to 3 students * Staff and students will only use their set room and not move about classrooms * Students will stay with the same staff member for the whole session |

#### Staff Health and Safety – COVID 19 Use of PPE

The majority of staff in education settings will not require PPE beyond what they would normally need for their work, even if they are not always able to maintain a distance of 2 metres from others. PPE is only needed in a very small number of cases including:

* Children, young people and students whose care routinely already involves the use of PPE due to their intimate care needs should continue to receive their care in the same way.

* If a child, young person or other learner becomes unwell with symptoms of coronavirus while in their setting and needs direct personal care until they can return home. A fluid-resistant surgical face mask should be worn by the supervising adult of a distance of 2 metres cannot be maintained.

* If contact with the child or young person is necessary, then disposable gloves, a disposable apron and a fluid resistant surgical face mask should be worn by the supervising adult. If a risk assessment determines that there is a risk of splashing to the eyes, for example from coughing, spitting, or vomiting, then eye protection should also be worn – appropriate PPE will be available in the reception area. Appropriate PPE kit will be available in the kitchen on the 1st floor and in the loft space on the 2nd floor.

##### Staff Uniform

1. All staff will be provided with two uniform tops and two wash bags.

1. Staff must not travel to work in their uniform tops.

1. The toilets will be available for staff to change into and out of their uniform tops.

1. At the start of every shift staff will change into their uniform tops.

1. At the end of every shift staff will change out of their uniform tops and put them straight into washing bags.

1. Staff will take their washing bags home with their uniforms in them and put them into the washing machines still inside their washing bags. This is to minimize the risk of any infection they may come into contact with is not passed on to members of their household.

##### Visors and masks

1. All staff are responsible for cleaning their workstations after each set of students leave and will be provided with a personal cleaning kit for this purpose.

1. All staff will also ensure that doors, door handles and bannisters are wiped down as the last student leaves each session.

1. Staff and students will be provided with wipe clean safety visors.

1. Staff and students must wear the safety visors/mask during sessions to minimise risk.

1. Staff must rub down their visors in between each session with an alcohol-based cleaner that will be on their workstation.

1. Staff must wash hands thoroughly between each session.

1. If your visor becomes damaged it must be changed immediately.

1. Staff and students may choose to wear face masks with clear plastic panels to be able to

see facial expressions.

### Disciplinary Policy and Procedure

It is necessary to have a minimum number of rules in the interests of the whole organisation.

The rules set standards of conduct / behaviour and performance, which are necessary to ensure that we can operate in a safe and fair way, as an employer. It is our aim that the rules and procedures should emphasise and encourage improvement in the conduct of individuals, where they are failing to meet the required standards, and not be seen merely as a means of punishment. These standards will be made clear to all employees. We reserve the right to amend these rules and procedures where appropriate.

Every effort will be made to ensure that any action taken under this procedure is fair, with you being given the opportunity to state your case and appeal against any decision that you consider to be unjust.

The following Disciplinary Procedure should ensure that:

1. The correct procedure is used when requiring you to attend a disciplinary hearing.
2. You are fully aware of the standards of performance, action and behaviour required of you.
3. Disciplinary action, where necessary, is taken speedily and in a fair, uniform and consistent manner.
4. You will only be disciplined after careful investigation of the facts and the opportunity to present your side of the case. On some occasions temporary suspension on contractual pay may be necessary in order than an uninterrupted investigation can take place. This must not be regarded as disciplinary action or a penalty of any kind.
5. Other than for an “off the record” informal reprimand, you have the right to be accompanied by a fellow employee at all stages of the formal disciplinary process.
6. You will not normally be dismissed for a first breach of discipline, except in the case of gross misconduct.
7. If you are disciplined, you will receive an explanation of the penalty imposed and you will have the right to appeal against the finding and the penalty.

#### Disciplinary Rules

It is not practicable to specify all disciplinary rules or offences that may result in disciplinary action, as they may vary depending on the nature of the work. In example to the specific examples of unsatisfactory conduct, misconduct and gross misconduct shown in this Handbook, a breach of other specific conditions, procedure, rules etc. that are contained with this Handbook or that have otherwise been made known to you, will also result in this procedure being used to deal with such matters.

#### Rules Covering Unsatisfactory Conduct or Misconduct

These are examples only and not an in-depth list.

You will be liable for disciplinary action if you are found to have acted in any of the following ways:

1. Failure to abide by the general health and safety rules and procedures.
2. Smoking in designated non-smoking areas.
3. Consumption of alcohol on the premises.
4. Persistent absenteeism and / or lateness.
5. Unsatisfactory standards of output or work.
6. Rudeness towards service users, parents / guardians, members of the public or other employees, objectionable or insulting behaviour, harassment, bullying or bad language.
7. Failure to devote the whole of your time, attention and abilities to the centre and its affairs during your normal working hours.
8. Unauthorised use of E-mail and / or Internet.
9. Failure to carry out reasonable instructions or follow our rules and procedures.
10. Unauthorised use or negligent damage or loss of our property.
11. Failure to report immediately any damage to property or premises caused by you.

#### Serious Misconduct

Where one of the unsatisfactory conduct or misconduct rules has been broken and if, upon investigation, it is shown to be due to extreme carelessness or has a serious or substantial effect upon our operation or reputation, you may be issued with a final written warning in the first instance.

You may receive a final written warning as the first course of action if, in an alleged gross misconduct disciplinary matter, upon investigation, there is shown to be some level of mitigation resulting in it being treated as an offence just short of dismissal.

#### Gross Misconduct

Occurrences of gross misconduct are very rare because the penalty is dismissal without notice and without any previous warning being issued. It is not possible to provide a comprehensive list of examples of gross misconduct. However, any behaviour or negligence resulting in a fundamental breach of contractual terms that irrevocably destroys the trust and confidence necessary to continue the employment relationship will constitute gross misconduct.

Examples of gross misconduct include:

1. theft or fraud.
2. physical violence or bullying; (direct or indirect).
3. breach of health and safety rules that endangers the lives of, or may cause serious injury to, employees or any other person.
4. serious disregard of company rules.
5. unacceptable behaviour when on company business.
6. dishonesty, falsification of documents, supply of misleading information to the Company and fraud.
7. maltreatment of service users.
8. failure to report an incident of abuse, suspected abuse of a service user.
9. wilful misrepresentation at the time of appointment including:
   1. Previous positions held;
   2. Qualifications held;
   3. Falsification of date of birth;
   4. Declaration of health;

v. Failure to disclose a criminal conviction / caution within the provisions of the Rehabilitation of Offenders Act.

1. removing or using company, suppliers or customer’s property without authorisation and wilful damage thereto.
2. violence or threats to another person in connection with the employment.
3. serious insubordination.
4. sexual, racial or other discrimination or harassment, including verbal abuse.
5. dangerous disregard for Health and Safety rules.
6. a breach of confidentiality or disclosure to any third party, without authority of the Company, any information relating to the business of the Company or of its customers or suppliers.
7. being unfit for duty due to the consumption of alcohol or illegal substances.
8. dangerous disregard for security procedures.
9. making a disclosure with intent to disrupt.
10. unauthorised gambling on the premises.
11. an act of extreme incompetence.
12. conduct outside of work which compromises the employee’s suitability to continue in employment.

#### Procedure

Stages of the procedure

1. An initial incident or shortcoming constituting a minor offence will result in an informal oral warning being given by the manager. This warning will be recorded in the personnel file.
2. More serious offences or a recurrence of a similar lesser offence will result in a first written warning being issued by the manager to the employee.
3. Further misconduct of a similar or related nature committed by an employee will result in the manager issuing a final written warning to the employee.
4. Further misconduct following the issuing of a final written warning will result in further disciplinary action as the manager feels necessary, possibly dismissal.

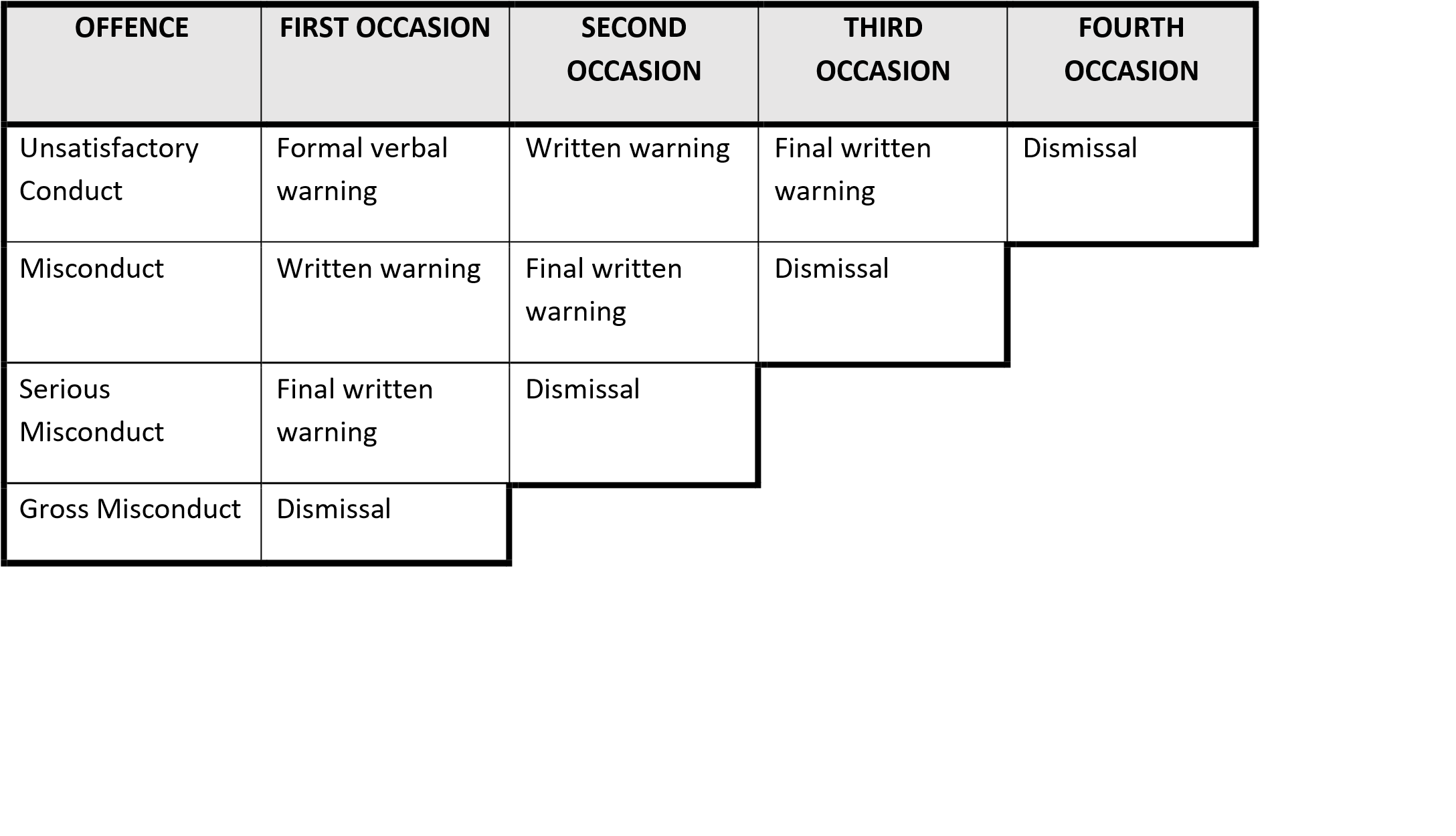
#### The rights of the employee

In any instance of the disciplinary procedure being invoked employees have the following rights:

1. To expect that a full and thorough investigation will take place before any disciplinary action is considered.
2. To state their case at each stage of the procedure.
3. To be accompanied by a fellow employee or an accredited trade union representative. The meeting may be postponed for up to 5 days, in order that the chosen individual can attend.
4. To have the right of appeal by following the steps under the Appeals Procedure set out below.

#### Disciplinary Procedure

Disciplinary action taken against you will be based on the following procedure:

At each stage a record will be made on the person’s record card which will be held in the individual’s personnel file following a one to one discussion with management. Each employee is required to sign the acknowledgement on the record card, failure to do so may result in further action.

We retain discretion in respect of the disciplinary procedures to take account of your length of service and to vary the procedures accordingly. If you have a short amount of service, you may not be in receipt of any warnings before dismissal however you will retain the right to a disciplinary hearing and you will have the right of appeal.

If a disciplinary penalty is imposed it will be in line with the procedures outlined above, which may encompass a formal verbal warning, written warning, final written warning, or dismissal, and full details will be given to you.

In all cases warnings will be issued for misconduct, irrespective of the precise matters concerned. Any further breach of the rules in relation to similar or entirely independent matters of misconduct will be treated as further disciplinary matters and allow the continuation of the disciplinary process through to dismissal if the warnings are not heeded.

#### Period of Warnings

An employee will be given a copy of any written warning and a copy will be held on file. Warnings will remain current, held in the employee's personal file for the following period:

1. A formal verbal warning – normally 6 months.
2. A first written warning – normally 12 months
3. A final written warning – normally 12 months.

When a warning is issued, the employee will be informed of how long the warning will remain on their record.

#### Appeals Procedure

You have the right to lodge an appeal in respect of any capability / disciplinary action taken against you.

It may be necessary, because of the size of the Company, for the appeal to be heard by the personal who took the original action and it is therefore important that your appeal gives details of why the penalty imposed is either too severe, inappropriate or unfair in the circumstances.

If you are appealing on the grounds that you have not committed the offence, it may be necessary for the person conducting the appeal to have a complete re-hearing so that there can be a reappraisal of all matters before a decision is made to grant or refuse the appeal.

You may be accompanied at the appeal hearing by a fellow employee or union representative of your choice and the result of the appeal will be made known to you in writing, normally within five working days after the hearing. This is the final stage of the appeal process.

We reserve the right to allow third parties to chair any formal hearings.

#### Disciplinary Procedure

**The following principles will apply at every stage beyond the informal stage, should the Company decide that it is appropriate to enter into the formal disciplinary procedure.**

**Step 1**: Statement of grounds for action and invitation to meeting

* The manager will set out in writing the employee's alleged misconduct, poor performance, or other circumstances, which led him/her to contemplate taking disciplinary action against the employee.
* The manager will send the statement to the employee and invite the employee to attend a meeting to discuss the matter.

**Step 2**: Meeting

* The meeting will take place before action is taken, (note: excepting where it has been deemed necessary to suspend the employee on full pay as a precautionary measure while investigations are carried out).
* The meeting will not take place unless:

i. The manager has informed the employee what the complaint against him/her is in writing as above.

ii. The employee has had a reasonable opportunity to consider his or her response to the allegations.

* The employee must take all reasonable steps to attend the meeting.
* After the meeting, the Manager will inform the employee of his/her decision and notify him/her of the right to appeal against the decision if he/she is not satisfied with it.

**Step 3**: Appeal

* If the employee wishes to appeal, he or she must inform the Manager as per the Appeals Procedure above.
* If the employee informs the Manager of his or her wish to appeal, an appeal meeting will be arranged.
* The employee must take all reasonable steps to attend the meeting.
* The appeal meeting need not take place before the dismissal or disciplinary action takes effect.
* After the appeal meeting the Manager will inform the employee of the final decision in writing. **General requirements**

The following requirements apply to each of the procedures set out above.

**Timetable**

* Each step and action under the procedure must be taken without unreasonable delay.

#### Meetings

* Timing and location of meetings must be reasonable.
* Meetings must be conducted in a manner that enables both the Company and the employee to explain their cases. The employee has a right to be accompanied by a colleague or suitably accredited trade union representative.

***Note: This procedure is not intended to be a contractual term save for any statutory provisions which may be applied. The full procedure may not be available to staff with less than two years’ service/ staff on probation.***

### Grievance Policy and Procedure

#### Policy

The primary purpose of this Grievance Procedure is to enable staff to air any concerns that they may have about practices, policies or treatment from other individuals at work, and to effect speedy resolution where genuine problems exist. It is designed to help all employees to take the appropriate action when they are experiencing difficulties, in an atmosphere of trust and collaboration.

Although it may not be possible to solve all problems to everyone’s complete satisfaction, this policy forms an undertaking by the Company that it will deal objectively and constructively with all employee grievances, and that anyone who decides to use the procedure may do so with the confidence that their problem will be dealt with fairly.

This grievance procedure is not a substitute for good day to day communication. We encourage employees to discuss and resolve daily working issues in a supportive atmosphere. Many problems can be solved on an informal footing very satisfactorily if all employees are prepared to keep the channels of communication between themselves open and working well. This procedure is designed to deal with those issues which need to be approached on a more formal basis so that every route to a satisfactory solution can be explored and so that any decisions which are reached are binding and long lasting.

The procedure should be used by employees individually or collectively having a complaint or problem relating to their employment. It may also be used by employees who believe they are being sexually or racially harassed or the victim of some other form of harassment or unlawful discrimination.

Procedure

**Note: Employees may be accompanied at any stage in this procedure by an accredited trade union representative or colleague of their choice.**

##### Stage 1

In the first instance, the employee should approach a member of the management team informally to discuss the grievance. If the matter cannot be resolved by this approach, the employee should put the grievance in writing to a member of the management team. A meeting will be held within 5 working days to discuss the matter fully

##### Stage 2

The manager and employee should try to resolve the matter at this stage. If the employee is not satisfied with the decision, he /she should, appeal in writing within 5 working days of receiving the decision, in writing to a member of the management team.

##### Stage 3

The manager will meet with the employee within 14 days of receiving this request. This will be the final stage of the procedure and any decision made at this point will be final and binding.

#### General requirements

The following requirements must be adhered to in all Grievance Procedure set out above (as far as applicable).

**Timetable**

Each step and action under the procedure must be taken without unreasonable delay.

#### Meetings

* Timing and location of meetings must be reasonable.
* Meetings must be conducted in a manner that enables both employer and employee to explain their cases. The employee has a right to be accompanied by a colleague or suitably accredited trade union representative.

#### General

Any grievance or complaint can be discussed informally, or through the formal grievance procedure. Often raising issues promptly at the time in a sensible way helps to solve them and prevent further difficulties.

If you wish to appeal you must inform the Manager, in writing, within five working days. You will then be invited to a further meeting, which you must take all reasonable steps to attend. As far as reasonably practicable, the Company will be represented by a more senior manager than attended the first meetings, unless the senior manager attended the first meeting.

Following the appeal meeting, you will be informed of the final decision, normally within ten working days, which will be confirmed in writing.

We reserve the right to allow third parties to chair any formal hearings.

In cases of complaints about the inappropriate behaviour or attitude of any Tuition Centre staff members, the complaint will be risk assessed. If it is determined that the complaint relates to a safeguarding concern, the Instructor will always seek the advice of the Lead Authority Designated Officer (LADO), social care services, or the police if a crime has, or may have been committed. We will always inform Ofsted of any serious accident or incident, major injury, minor injury or dangerous occurrence as soon as possible or within 14 days.

### Allegations against staff

If there is an allegation made against a staff member, they are immediately suspended on full pay pending an investigation. Suspension is not part of a disciplinary procedure or action it is purely taken to protect the rights of employee and employer in such circumstances.

The investigation will be led by the management. A member of staff will be dismissed if it was felt that they had placed a child or colleague at significant risk of harm or have brought the centre into disrepute.

The centre has on display, Ofsted guidelines or procedures for parents/carers wanting to make an allegation.

### Whistleblowing Policy

Under certain circumstances, employees are protected from suffering any detriment or termination of employment if they make disclosures about organisations for whom they work.

“Whistleblowing” is when an employee tells on an employer who is breaking the law. The law protects employees who blow the whistle on their employers. If they are fired or otherwise retaliated against for whistleblowing they can sue.

#### Qualifying disclosures

Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the Company has committed a “relevant failure” by:

1. committing a criminal offence:
2. failing to comply with a legal obligation;
3. a miscarriage of justice;
4. endangering the health and safety of an individual;
5. environmental damage; or
6. concealing any information relating to the above.

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Company will take any concerns that you may raise relating to the above matters very seriously.

We encourage you to use this procedure is you are concerned about any wrongdoing at work. However, if the procedure has been invoked for malicious reasons or in pursuit of a personal grudge, they you will be liable to immediate termination of employment or such lesser disciplinary sanction as may be appropriate in the circumstances.

#### The Procedure

In the first instance you should report any concerns you may have to your line manager who will treat the matter with complete confidentiality. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate official organisation or regulatory body.

If you do not report your concerns to the manager, you should take them direct to the appropriate organisation or body.

#### Treatment by others

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

### Capability Procedures and Monitoring Performance

It is the aim of the Company to ensure that all employees are treated in a fair and equitable manner. Employees are required to perform the duties of their post to an acceptable standard. Where this standard is not met, employees will be offered support, encouragement, guidance and if necessary training to improve their work performance. However, a distinction must be drawn between inherent incapacity and a lack of performance that is attributable to a wilful refusal to work satisfactorily. The latter is a matter of conduct.

We recognise that during your employment with us your capability to carry out your duties may deteriorate. This can be for a number of reasons, the most common ones being that either the job changes over a period of time and you fail to keep pace with the changes, or you change (most commonly because of health reasons) and you can no longer cope with the work.

We monitor performance formally and informally through regular discussions that your Manager will have with you about your job, at the end of projects and through the appraisal process.

#### Job Changes / General capability Issues

If the nature of your job changes or if we have any general concerns about your ability to perform your job, we will try to ensure that you understand the level of performance expected of you and that you receive adequate training and supervision. Concerns regarding your capability will normally be first discussed in an informal manner and you will be given time to improve.

If your standard of performance is still not adequate you will be warned in writing that a failure to improver and to maintain the performance required could lead to your dismissal. We will also consider the possibility of a transfer to more suitable work if possible.

If there is still no improvement after a reasonable time and we cannot transfer you to more suitable work, or if your level of performance has a serious or substantial effect on our business or reputation, you will be issued with a final warning that you will be dismissed unless the required standard of performance is achieved and maintained.

If such improvement is not forthcoming after a reasonable amount of time, you will be dismissed with the appropriate notice.

#### Personal Circumstances / Health Issues

Personal circumstances may arise which do not prevent you from attending for work, but which prevent you from carrying out your normal duties (e.g. a lack of dexterity or general ill health). If such a situation arises, we will normally need to have details of your medical diagnosis and prognosis so that we have the benefit of expert advice. Under normal circumstances this can be most easily obtained by asking your own doctor for a medical report. Your permission is needed before we can obtain such a report and we will expect you to co-operate in this matter should the need arise. When we have obtained as much information as possible regarding your condition and after consultation with you, a decision will be made about your future employment with us in your current role or, where circumstances permit, in a more suitable role.

**Sickness reporting**

All employees are responsible for reporting an absence from the centre no less than 2 hours before a tuition session is due to begin. Failure to report via the centre landline number or centre mobile may result in the disciplinary procedure being actioned.

Anyone reporting in sick for a shift, **must call,** (not text or WhatsApp other staff members) and leave a message on the phone or mobile voicemail if no one from the centre answers.

#### Short Service Staff

We retain discretion in respect of this procedure to take account of your length of service and to vary the procedures accordingly. If you have a short amount of service, you may not be in receipt of any warnings before dismissal, but you will retain the right to a hearing, and you will have the right of appeal.

#### Appeal Procedure

If you are dismissed because you are not capable of performing your job to an acceptable standard you have the right of appeal against this decision. Refer to the ‘Capability / Disciplinary Appeal Procedure’ contained within this Handbook.

Nothing in this procedure however, is intended to prevent the normal process of supervisory control where managers allocate work, monitor performance, draw attention to errors and poor quality and, as importantly, highlight work done well. This ongoing day-to-day process may include informal assistance in achieving improvement to the required standard. Much of this ongoing process will be carried out in conjunction with the appraisal procedures in place. Such discussions are not part of the Capability Procedure and therefore formal interviews and representation are not appropriate to this everyday ongoing process.

### Bribery Policy

The Company is committed to ensuring that all our commercial dealings meet the highest professional standards. It would never be acceptable for anyone to accept or offer bribes in any business transaction.

Bribes may come in a variety of forms such as corporate hospitality, charitable donations, personal gifts, hospitality as well as money. You are not permitted to accept any gift from service users, parents / guardians without the approval of the Manager. All offers of gifts are to be notified to the Manager.

At Christmas, all gifts received will be put into a pool for all employees.

Breaches of these rules will result in disciplinary action up to and including dismissal.

This policy applies to the managers, our employees, suppliers, outsource partners, consultants and to all markets in which we do business.

As part of our Induction training all staff will be made aware of this policy.

### IT Security and Social Media Policy

IT support and social media content is reviewed, managed and approved by an authorised administrator or management. All items posted to our social media accounts should be sent to an administrator or member of management and approved for posting. Where there is uncertainty on suitability of the content for the post, management will be informed and further advice sought.

IT equipment, internet and email facilities are provided by the company in its premises.

These facilities are provided to you at the company expense as a business tool for work-related purposes. You are therefore expected to use these facilities primarily for work-related purposes, and whilst you are using these facilities you will ensure that your conduct is business-like and appropriate. All of the company policies apply whilst you use these facilities. In all the external communications you make, you are expected to ensure that you represent the company appropriately, having due regard to its legal position and corporate identity. You are also expected to treat systems security as a priority and adhere to this policy at all times.

These regulations apply to the use of all local facilities at and to facilities provided by the company to its employees for use at home or off site. Please note that breaches of this policy will be considered gross misconduct and you may be dismissed.

Hardware owned, leased, rented or otherwise by the company employees or third parties approved by the company may be directly connected to the network only by arrangement with, and with the explicit approval of Margaret Rude. Such equipment may access the network or other facilities only in accordance with the terms of these regulations.

The facilities may be used only in connection with employees’ work for the company. They must not be used for work of undeclared financial benefit to employees or the transmission of unsolicited commercial material without the express permission, in writing, of Margaret Rude**.**

You must not interfere with the work of others or the system itself. The facilities must be used in a responsible manner – in particular, you must not:

* access, store or distribute material which is designed or likely to cause annoyance, inconvenience, needless anxiety or offence;
* access, store or distribute obscene or indecent material, pornography, etc;
* access, store or distribute defamatory material;
* access, store or distribute material such that the copyright of another person is infringed;
* gain deliberate unauthorised access to facilities or services accessible via local or national networks or access, store or distribute programmes designed to facilitate such access;
* engage in activities which waste resources (your own or other people’s time, networks or computers) or which are liable to cause a disruption or denial of service to other users. This includes the following: introduction of viruses into computer systems; use of Internet Relay Chat facilities; use of peer-to-peer networking products; use of internet TV, radio or similar streamed media services; use of social networks such as Facebook, Bebo and YouTube etc.
* Use the Company’s IT systems to keep a personal “blog”.
* engage in activities which are illegal, or which might contribute to the commission of an illegal act;
* engage in any transaction purporting to be representing the Company when not authorised.

You must not gain unauthorised access to or violate the privacy of other peoples’ files, corrupt or destroy other peoples’ data or disrupt the work of other people.

It is your responsibility to prevent inappropriate access to your files. Your password must be kept safe, changed regularly and not be disclosed to anyone.

You must not send electronic mail which is irresponsible, or likely to cause offence nor use network messaging without authority. “Irresponsible” use includes unsolicited postings to large numbers of people or indiscriminate postings.

In order to prevent the introduction of virus contamination into the software system the following must be observed:

1. unauthorised software including public domain software, magazine cover disks / CDs or

Internet / World Wide Web downloads must not be used; and

1. all software must be virus checked using standard testing procedures before being used.

Never use the internet to transmit confidential personal or business sensitive information.

The Company does not normally examine the contents of email or files belonging to computer users, but it reserves the right to do so if necessary, to maintain the functionality of the system or where the Company has reason to suspect that these regulations are being breached. Users are therefore advised that such monitoring can and may occur. Please note e-mail messages even when they have been deleted from the Company’s e-mail system can be traced, retrieved and the person or persons involved in creating or forwarding any offending e –mail identified. E-mails are admissible in a court of law.

The Company will hold individual employees personally liable if they or their customers or clients suffer any loss or damage to its reputation as a result of any breach of these conditions.

You must comply with the requirements of all relevant legislation.

We are guardians of considerable amounts of sensitive data and it is vital for our business integrity that care is taken to safeguard both the information and the database systems themselves.

### Social Networking Sites/ Blogs

Employees are reminded that the confidentiality clause contained in their contract of employment extends to the use of the internet, social networking sites and blogs. Employees are also reminded of their responsibility to act appropriately and professionally at all times when using these sites and advise that you consider carefully whether it is appropriate to befriend a client, customer or associate bearing in the mind the content that they may be privy to and the implications of this. Where employees decide to use these sites, they must not display or knowingly allow to be displayed on the internet any information which could be considered to be confidential.

As a Company we recognise that social media will be an important element of driving our business forward. We are also aware that social media will not be used exclusively for business. The following guidelines are intended to help determine acceptable standards when you are online using social media and other related sites.

Employees must ensure that any entries made on social networking sites such as Facebook, YouTube, Twitter, LinkedIn or blogs etc, both personal and business related, are appropriate and do not damage the reputation of the Company, its clients, customers, associates, freelancers or any employee of the Company. It should be remembered that that any business or personal usage that brings the Company, its clients, customers, associates, freelancers or any employee of the Company into disrepute is totally unacceptable and will be classed as Gross Misconduct. You should not have a service user or parent / guardian as a friend on such a site.

You are responsible for what you post; never use the Company’s name to promote your own ideas. Employees who are permitted to use social media tools for business use should always remember they are representing the business, our brand and reputation; when you are online and interacting with other people on the internet you are speaking on behalf of the Company. Identify yourself as an employee of the Company; we want anyone who interacts on social media activities to represent the best interests and standards of our brand. When creating a blog you must obtain permission from you are a member of the management team and use your own name not an alias. Never use a customer’s name in a Blog or online unless you have their written permission to do so. Be careful about information you share about yourself and or others within the Company, so that your colleagues are treated with respect for their confidentiality.

You must not become involved in arguments or disagreements with conversations or postings relating to the company, employees, clients, customers, associates or freelancers. If an employee discovers these, they must report them to a member of the management team. If an employee is approached with a negative complaint or an awkward question regarding those as detailed in this policy, they must report this immediately to a member of the management team.

At no time must an employee make comments on social networking sites or blogs about those individuals as detailed above which are unpleasant or inappropriate. Employees must also not engage or be seen to endorse a group or comment made by another which is of the nature as detailed in this policy. It is of the upmost importance that we respect and value others and show professionalism and integrity at all times.

If it any time an employee feels the need to make comments or endorse those as detailed in this policy, they should instead raise their concerns internally using the Company grievance procedure.

Failure to adhere to this policy may result in disciplinary action being taken up to and including dismissal.

### Cameras, Videos and other Photographic / Audio Devices

Cameras or other photographic / audio equipment (e.g. I-pods, voice recorders), other than those belonging to the Company, must not be brought in to work. IT resources are allocated to employees as required and serial numbers recorded. Additional memory cards must not be introduced. Memory cards must remain on the premises when they are not being used.

All information about students must remain on our premises at all times. Under no circumstances will permission be granted to remove these items in order to work on them at home or elsewhere. Removal of such items will be treated as serious / gross misconduct which could result in dismissal.

Relevant written documentation i.e. written assessments or profiles may be taken off site with the prior approval of the Manager.

### Drug and Alcohol Policy

It is the responsibility of the Company to ensure, so far as is reasonably practical the health, safety and wellbeing of all employees. Employees who are under the influence of drugs and / or alcohol whilst at work may adversely influence their own safety and that of their colleagues.

#### Definition

Alcohol covers all alcoholic beverages. Drugs include all Class A B and C substances, drugs which are only legally available on prescription and solvents which are misused.

#### Rules

The taking of alcohol and drugs is strictly prohibited before working hours where appropriate functioning at work would be adversely affected and at all times during working hours. For the avoidance of doubt, working hours include meal and other breaks.

No one is to drive any vehicle having consumed alcohol or if under the influence of non-prescribed drugs.

The Company reserve the right to carry out random breath tests of staff where the operation of vehicles or machinery by such a person could be seriously impaired by the effects of alcohol. The Company also reserves the right to carry out drug testing should there be reasonable belief.

#### Special Circumstances

Where employees are taking medication for a pre diagnosed condition, the type of drug and its possible contra indications must be reported by the employee to a member of the management team. **Confidentiality**

An employee who has a drug or alcohol related problem may approach us in confidence, within the provisions of the law, and receive help and support. Any absence during a rehabilitation period will be treated as normal sickness.

#### Disciplinary Action

1. any employee who is found to be under the influence of drugs and or alcohol during working hours will be suspended on full pay pending a disciplinary hearing which may result in the employee’s dismissal for gross misconduct.
2. any employee found to be in possession of or dealing in illegal substances will be suspended on full pay pending a disciplinary hearing, which may result in the employee's dismissal for gross misconduct.

In all instances of this kind the employee will be reported immediately to the police.

### Smoking Policy

The Company has a duty to protect all our employees, customers and visitors from exposure to second-hand smoke and to assist compliance with the Health Act 2006.

All staff are obliged to adhere to and support the implementation of the policy. Appropriate ‘no smoking’ signs will be clearly displayed at the entrances to and within the premises, and in all smoke free vehicles.

Health and well-being is of utmost importance for the students in our care. Smoking has proved to be a health risk and in accordance with childcare legislation, the centre operates a strict no smoking policy within its buildings and grounds. Parents are respectfully requested to abstain from smoking whilst on the premises. This rule also applies to staff, students, carers and visitors etc.

Smoking is not permitted in the building, at the front entrance, or when in view of service users, parents / guardians.

We respect it is personal choice to smoke, although we support healthy lifestyles and therefore will help staff and parents to stop smoking by offering support and information.

To maintain our professional reputation and image, we do not condone staff smelling of cigarettes when they are in direct contact with students and / or parents / guardians.

This policy also relates to the use of e-cigarettes.

**Help to Stop Smoking.**

The NHS offers a range of free services to help smokers give up. Visit [www.gosmokefree.co.uk](http://www.gosmokefree.co.uk/) or the NHS smoking helping on 0800 169 0 169 to find your local NHS stop smoking service.

Employees are reminded that under the new legislation, any person caught smoking in an enclosed public area may be personally liable for a fine of £50 and possible criminal prosecution.

Failure to adhere to the Company’s no smoking policy may result in disciplinary action.

### Reporting suspected irregularities

The Company promotes accountability and good practice in the workplace and wishes to ensure that concerns about suspected serious malpractice, illegal or dangerous practices can be properly raised by workers and therefore addressed in the correct manner. The Company will make every effort to deal seriously with such concerns, raised in good faith, in a fair, objective and discreet manner and will investigate them thoroughly.

Additionally, the Public Interest Disclosure Act 1998 protects workers from being subject to detriment or victimised by their employer for making external disclosures of certain information, to certain individuals, in certain circumstances, providing they can show that they believed there was an irregularity, and that it was reasonable for them to believe it, in the circumstances, at the time of the disclosure.

This policy specifically relates to a major concern that an individual may have. It does not cover routine management issues or problems, such as concerns about terms and conditions of employment or differences of opinion about day-to-day working issues; these should be raised with management as part of the usual supervision process or, as appropriate, through the grievance procedure.

### Data Protection Policy & GDPR

The security and privacy of your data is taken seriously by us but we need to gather and use information or ‘data’ about you as part of our business and to manage our relationship with you. We are committed to complying with our all the Data Protection legal obligations

This policy applies to current and former employees, workers, interns, apprentices and consultants. If you fall into one of these categories, then you are a ‘data subject’ for the purposes of this policy. You should read this policy alongside your contract of employment (or contract for services) and any other notice we issue to you from time to time in relation to your data.

The Company has taken steps to protect the security of your data in accordance with our Data Protection Policy and will train staff about their data protection responsibilities as part of the induction process. We will only hold data for as long as necessary for the purposes for which we collected it.

The Company is a ‘**data controller**’ for the purposes of your personal data. This means that we determine the purpose and means of the processing of your personal data.

This policy explains how the Company will hold and process your information. It explains your rights as a data subject. It also explains your obligations when obtaining, handling, processing or storing personal data in the course of working for, or on behalf of, the Company.

This policy does not form part of your contract of employment and can be amended by the Company at any time.

#### Data Protection Principles

Personal data must be processed in accordance with six ‘**Data Protection Principles**.’ It must:

* be processed fairly, lawfully and transparently;
* be collected and processed only for specified, explicit and legitimate purposes;
* be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
* be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay;
* not be kept for longer than is necessary for the purposes for which it is processed; and
* be processed securely.

We are accountable for these principles and must be able to show that we are compliant.

#### How we define personal data

‘**Personal data**’ means information which relates to a living person who can be **identified** from that data (a ‘**data subject**’) on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others, in respect of that person. It does not include anonymised data.

This policy applies to all personal data whether it is stored electronically, on paper or on other materials.

This personal data might be provided to us by you, or someone else (such as a former employer, your doctor, or a credit reference agency), or it could be created by us. It could be provided or created during the recruitment process or during the course of the contract of employment (or services) or after its termination. It could be created by your manager or other colleagues.

The types of personal data we collect and use about you is included in the Privacy Notice that is issued with your contract of employment.

#### How we define special categories of personal data

‘**Special categories of personal data**’ are types of personal data consisting of information as to:

* your racial or ethnic origin;
* your political opinions;
* your religious or philosophical beliefs;
* your trade union membership;
* your genetic or biometric data;
* your health;
* your sex life and sexual orientation; and
* any criminal convictions and offences.

We may hold and use any of these special categories of your personal data, as detailed in the Privacy Notice, in accordance with the law.

#### How we define processing

**‘Processing’** means any operation which is performed on personal data such as: • collection, recording, organisation, structuring or storage;

* adaption or alteration;
* retrieval, consultation or use;
* disclosure by transmission, dissemination or otherwise making available;
* alignment or combination; and • restriction, destruction or erasure.

This includes processing personal data which forms part of a filing system and any automated processing.

#### How will we process your personal data

The Company will process your personal data (including special categories of personal data). We will use your personal data for:

* performing the contract of employment (or services) between us;
* complying with any legal obligation; or
* if it is necessary for our legitimate interests (or for the legitimate interests of someone else). However, we can only do this if your interests and rights do not override ours (or theirs). You have the right to challenge our legitimate interests and request that we stop this processing.

We can process your personal data for these purposes without your knowledge or consent. We will not use your personal data for an unrelated purpose without telling you about it and the legal basis that we intend to rely on for processing it.

Examples of when we might process your personal data can be found in the Privacy Notice. We will only process special categories of your personal data in certain situations in accordance with the law. For example, we can do so if we have your explicit consent. If we asked for your consent to process a special category of personal data then we would explain the reasons for our request. You do not need to consent and can withdraw consent later if you choose by contacting the person for responsible for Data in the Company.

We do not need your consent to process **special categories** of your personal data when we are processing it for the following purposes, which we may do:

* where it is necessary for carrying out rights and obligations under employment law;
* where it is necessary to protect your vital interests or those of another person where you/they are physically or legally incapable of giving consent;
* where you have made the data public;
* where processing is necessary for the establishment, exercise or defence of legal claims; and
* where processing is necessary for the purposes of occupational medicine or for the assessment of your working capacity.

We might process special categories of your personal data for the purposes stated in the Privacy Notice, in particular, we may use information in relation to:

* your race, ethnic origin, religion, sexual orientation or gender to monitor equal opportunities;
* your sickness absence, health and medical conditions to monitor your absence, assess your fitness for work, to pay you benefits, to comply with our legal obligations under employment law including to make reasonable adjustments and to look after your health and safety; and
* your trade union membership to pay any subscriptions and to comply with our legal obligations in respect of trade union members.
* Any criminal convictions or offences for the purposes of your DBS requirements

We do not take automated decisions about you using your personal data or use profiling in relation to you.

#### Sharing your personal data

Sometimes we might share your personal data with group companies or our business partners, contractors and agents to carry out our obligations under our contract with you or for our legitimate interests.

We require those companies to keep your personal data confidential and secure and to protect it in accordance with the law and our policies. They are only permitted to process your data for the lawful purpose for which it has been shared and in accordance with our instructions.

We use the following contractors to carry out our Company business:

• Payroll /accountant to store and manage your personal data with regard to your pay • Outsourced HR company

If this changes you will be notified of this and the protections which are in place to protect the security of your data will be explained.

#### How should you process personal data for the company

Everyone who works for, or on behalf of, the Company has some responsibility for ensuring data is collected, stored and handled appropriately, in line with this policy and the Company’s IT Security and Data Retention policies.

The Company’s Data Protections Officer is responsible for reviewing this policy on the Company’s data protection responsibilities and any risks in relation to the processing of data. You should direct any questions in relation to this policy or data protection to this person and address any written requests to them.

You should only access personal data covered by this policy if you need it for the work you do for, or on behalf of the Company and only if you are authorised to do so. You should only use the data for the specified lawful purpose for which it was obtained.

* You should not share personal data informally.
* You should keep personal data secure and not share it with unauthorised people.
* You should regularly review and update personal data which you have to deal with for work. This includes telling us if your own contact details change.
* You should not make unnecessary copies of personal data and should keep and dispose of any copies securely.
* You should use strong passwords.
* You should lock your computer screens when not at your desk.
* Consider anonymising data or using separate keys/codes so that the data subject cannot be identified.
* Do not save personal data to your own personal computers or other devices.
* Personal data should never be transferred outside the European Economic Area except in compliance with the law and authorisation of the person for responsible for Data in your Company.
* You should lock drawers and filing cabinets. Do not leave paper with personal data lying about.
* You should not take personal data away from Company’s premises without authorisation from your line manager or of the person for responsible for Data in your Company.
* Personal data should be shredded and disposed of securely when you have finished with it.
* You should ask for help from the person for responsible for Data in your Company if you are unsure about data protection or if you notice any areas of data protection or security we can improve upon.
* Any deliberate or negligent breach of this policy by you may result in disciplinary action being taken against you in accordance with our disciplinary procedure.
* It is a criminal offence to conceal or destroy personal data which is part of a subject access request (see below). This conduct would also amount to gross misconduct under our disciplinary procedure, which could result in your dismissal.

#### How to deal with data breaches

We have robust measures in place to minimise and prevent data breaches from taking place. Should a breach of personal data occur (whether in respect of you or someone else) then we must take notes and keep evidence of that breach. If the breach is likely to result in a risk to the rights and freedoms of individuals, then we must also notify the Information Commissioner’s Office within 72 hours.

If you are aware of a data breach you must contact of the person for responsible for Data immediately and keep any evidence you have in relation to the breach.

#### Subject Access request

Data subjects can make a ‘**subject access request**’ (‘SAR’) to find out the information we hold about them. This request must be made in writing. If you receive such a request, you should forward it immediately the person for responsible for Data in your Company who will coordinate a response.

If you would like to make a SAR in relation to your own personal data, you should make this in writing to the person for responsible for Data in the Company. We must respond within one month unless the request is complex or numerous in which case the period in which we must respond can be extended by a further two months.

There is no fee for making a SAR. However, if your request is manifestly unfounded or excessive we may charge a reasonable administrative fee or refuse to respond to your request.

#### Your data subject rights

* You have the right to information about what personal data we process, how and on what basis as set out in this policy.
* You have the right to access your own personal data by way of a subject access request (see above).
* You can correct any inaccuracies in your personal data. To do you should contact of the person for responsible for Data in the Company.
* You have the right to request that we erase your personal data where we were not entitled under the law to process it or it is no longer necessary to process it for the purpose it was collected. To do so you should contact the person for responsible for Data in the Company.
* While you are requesting that your personal data is corrected or erased or are contesting the lawfulness of our processing, you can apply for its use to be restricted while the application is made. To do so you should contact the person for responsible for Data in the Company.
* You have the right to object to data processing where we are relying on a legitimate interest to do so and you think that your rights and interests outweigh our own and you wish us to stop.
* You have the right to object if we process your personal data for the purposes of direct marketing.
* You have the right to receive a copy of your personal data and to transfer your personal data to another data controller. We will not charge for this and will in most cases aim to do this within one month.
* With some exceptions, you have the right not to be subjected to automated decision-making.
* You have the right to be notified of a data security breach concerning your personal data.
* In most situations we will not rely on your consent as a lawful ground to process your data. If we do however request your consent to the processing of your personal data for a specific purpose, you have the right not to consent or to withdraw your consent later. To withdraw your consent, you should contact the person for responsible for Data in the Company.
* You have the right to complain to the Information Commissioner. You can do this be contacting the Information Commissioner’s Office directly. Full contact details including a helpline number can be found on the Information Commissioner’s Office website

[(www.ico.org.uk)](http://www.ico.org.uk/). This website has further information on your rights and our obligations.

### Personnel records

Personnel records are maintained by an authorised administrator and management members only. Margaret Rude is the main holder of these records. Such records are maintained in a secure system and access to the information therein contained is strictly controlled. You must notify management in the main office if and when changes take place to your name, address and the identity or whereabouts of your personal emergency contact.

### Bullying and Harassment

The organisation encourages an environment in which everyone is entitled to work without harassment, victimisation and bullying.

Harassment may be described broadly as "unwanted conduct affecting the dignity of men and women". Where a particular form of conduct has the effect of making a person feel humiliated, threatened or that their privacy is being invaded, then that conduct will constitute harassment and should cease immediately.

We will not condone harassment and the procedure for dealing with complaints is set out below.

The policy applies to employee's conduct in, or out of office hours, when entertaining customers, or at work events.

You have a responsibility for complying with this policy and treating all colleagues with dignity and respect. If you believe that you have been subject to, or witnessed harassment, victimisation or bullying, you must inform Margaret Rude so that we can keep our workplace free from unacceptable behaviour.

**The procedure for dealing with cases of bullying and / or harassment (directly or indirectly) is set out below:**

If you believe you are being subjected to any harassment then, in the first instance you should ask the offender to stop or make it clear that such attention is unwelcome. If necessary, ask a friend or colleague to help you do this.

Such an informal approach may be all that is needed, but you should make a note of the details and keep them.

If your request is ignored and the harassment continues, or you feel unable to make the informal approach, please contact your manager immediately. Details will be taken and should be confirmed in writing by the victim, this constitutes a formal complaint.

Either a manager nominated by the manager who took the complaint, or an independent consultant, will investigate the complaint. Allegations will be dealt with seriously and confidentially and there will be no victimisation of any employee making or being involved in a complaint.

In cases of serious alleged harassment, any employee directly involved may be suspended on full pay pending investigation.

If the harassment has taken place, then the accused will be dealt with in accordance with the Disciplinary and Grievance procedures.

It is hoped that the implementation of this policy will ensure that all our employees work in an atmosphere of mutual trust, dignity and respect.

## Equal Opportunities & Diversity Policy

In our centre we believe in valuing and celebrating the diversity within our community. We aim to develop good practice and positive attitudes and encourage an anti-discriminatory approach to the world in general, and other human beings in particular. We believe that all people should have equal opportunities to learn, develop and grow with dignity in a community of mutual respect.

### Implementation of the policy

Theregistered person – Margaret Rude **must ensure that:**

New members of staff, including apprentices and volunteers, receive information linked to the Equal Opportunities Policy, and that it is discussed with them during their induction meeting.

The Equal Opportunities Policy is made available to all parents and carers.

Every effort is made to use the child’s first language. When this is not feasible the centre involves other agencies for advice and assistance wherever possible.

Every effort is made to obtain suitable specialist equipment, aids or resources.

Reasonable adjustments are made to the premises to cater for anyone with any form of disability.

### Our practice

The Equal Opportunities Policy applies to every staff member, student, parent, carer and child. Each person is valued as an individual, with differing social, intellectual and cultural backgrounds. Different needs, likes, dislikes, similarities and differences are respected and accounted for.

Nobody in our centre is subjected to discrimination, racist comments or gender bias. Cultural and religious diversity is respected, within a positive, inclusive atmosphere. We aim for all to feel equally valued and self-confident. We aim to support all our students’ high aspirations and personal visions.

We challenge and deal with inappropriate practices and attitudes promptly.

We record any seriously inappropriate racist or sexist comments made by students and staff.

### Staff training

We take great care to apply the Equal Opportunities Policy when advertising for, interviewing and appointing staff.

We keep staff informed and updated on new legislation (e.g. Equality Act 2010), and train them accordingly.

We give the opportunity to attend courses for staff who:

* have identified an area in which they wish to improve their own knowledge and expertise.
* have been identified through an inspection or an in-house appraisal/review as having a training need.
* want to further their own personal development.

We expect all staff to behave in a professional manner, follow the above policy and try to be consistent, sensitive and fair. We expect them to challenge others who make inadvertent racist, sexist or insensitive remarks.

We tackle racism in all its forms – overt acts and institutional. We recognise the importance of promoting good relationships between people of different ethnic groups and for preparing the students for life in a culturally diverse society, always striving to promote racial harmony. We consider the views and needs of all students, staff, parents, carers and visitors and attempt to bring all into our training and decision making.

Equipment - We purchase, organise and monitor equipment, toys, books and resources to reflect diversity in the immediate and wider society. We display positive images of differing races, cultures, religions, social groups, physical abilities and disabilities and gender in and around the centre.

### Leaving the Company

In order to ensure that all the necessary actions are taken effectively when an employee leaves the Company, we have a leaving procedure that should be followed. If an employee wishes to resign from the Company, they should write to a member of the management team giving the length of notice required by their contract of employment and the date they would like their employment to end together with the reasons for resignation.

The employee will need to arrange with management for the return of any the company property they have in their possession. For example: any manuals, laptop, mobile phone, company vehicles etc. All property must be returned in good condition and before the employee’s leaving date. If this is not possible, all company property should be returned within 7 working days after termination date.

The employee may be asked to spend some time handing over their work to another member of staff.

If you terminate your employment without giving or working the required period of notice, as shown in your individual statement of main terms of employment, you will have an amount, equal to any additional costs of covering your duties during the notice period not worked, deducted from any termination pay due to you. This is an express term of your contract of employment. You will also forfeit any contractual accrued holiday pay due to you over and above statutory holiday pay, if you fail to give or work the required period of notice.

### Personal property

Staff are solely responsible for the safety of their personal possessions on Company premises and should ensure that their personal possessions are kept in a safe place at all times. The Company cannot accept responsibility for personal property lost or damaged on or off its premises. Staff are asked to take all reasonable care of their valuables at all times.

The Company takes no responsibility for loss or damage to personal belongings brought onto the premises. They are brought in at their own risk.

Mobile phones will be collected from staff and stored securely. Use of a mobile phone will be viewed as gross misconduct and anyone found using their phone without permission will be subject to disciplinary procedures.

In the case of emergencies, the Company phone may be used by employees.

Any loss or damage should be reported immediately to a member of the management team. It is advisable that you consider the extent of your own domestic insurance cover and whether or not this provides for possible loss or damage of your property whilst at work.

### Company property

Staff are to treat The Company property with due care and attention. Upon leaving the organisation any property that has been issued to you for the purpose of your employment, such as uniform, computer hardware, software, manuals etc., must be returned to the relevant department.

### Health & Safety Policy

#### General statement of policy

Our policy is to provide and maintain safe and healthy working conditions, equipment and systems of work for all our employees, and a safe environment for the students to be cared and educated in. We provide such information, training and supervision as they need for this purpose. We wish to develop and promote a strong health and safety culture within the Company for the benefit of all staff, students and parents. We also accept our responsibility for the health and safety of other people who may be affected by our activities.

The allocation of duties for safety matters and the particular arrangements which we will make to implement the policy are set out within this policy and sufficient resources will be made available to honour our commitment.

The policy will be kept up to date, particularly as the business changes in nature and size, and will be revised annually, or as and when required. We therefore welcome any useful comments from members of staff, parents and visitors regarding this policy.

#### Aims and objectives

The aim of this policy statement is to ensure that all reasonably practical steps are taken to ensure the health, safety and welfare of all persons using the premises. To achieve this we will actively work towards the following objectives:

* Establish and maintain a safe and healthy environment
* Establish and maintain safe working procedures amongst staff and students
* Make arrangements for ensuring safety and the absence of risks to health in connection with the use, handling, storage and transport of articles and substances.
* Ensure the provision of sufficient information, instruction and supervision to enable all people working on the premises to avoid hazards and contribute positively to their own health and safety, and to ensure that staff have access to regular health and safety training as and when provided.
* Maintain a healthy and safe environment and safe entry and exit from it.
* Formulate effective procedures for use in case of fire and other emergencies and for evacuating the premises. Practice this procedure on a regular basis to enable the safe and speedy evacuation of the premises.
* Follow the regulations of the Health & Safety at Work Act 1974 and any other relevant legislation.
* Maintain a safe working environment for pregnant workers or for workers who have recently given birth including undertaking appropriate risk assessments.

We believe the risks in our environment to be low but to maintain the maximum protection for students, staff and parents/carers we consider it necessary to:

* Ensure the entrances and exits from the building, including fire exits remain clear at all times.
* Regularly check the premises room by room for structural defects, worn fixtures and fittings or electrical equipment, and take the necessary remedial action.
* Ensure that all staff, visitors, parents and students are aware of the fire procedures and regular fire drills are carried out.
* Ensure that all members of staff are aware of the procedure to follow in case of accidents for staff, visitors and especially students.
* Ensure that all members of staff take all reasonable action to control the spread of infectious diseases and that they wear protective gloves and clothes where appropriate.
* Prohibit smoking on the premises.
* Prohibit any contractor working on the premises without prior discussion with the officer in charge to negate any risks to the staff or students.
* Not allow inappropriate jewellery to be worn. One pair of stud earrings and wedding/engagement rings are acceptable.
* Follow a smart and practical dress code, with sensible shoes.
* Prohibit running inside the premises.
* Risk assess all electrical sockets and appropriate measures taken to reduce risks where necessary, and there should be no trailing wires.
* Place all cleaning materials/toilet cleaner out of the reach of students and in original containers.
* Wear protective clothing when cooking or serving food.
* Receive telephone calls before 8am if a member of staff is not able to attend work for sickness or other reasons.
* Expect all staff to familiarise themselves with the position of the First Aid boxes and know who the appointed First Aider is.
* Have all students supervised at all times.

All employees have the responsibility to co-operate with the manager and senior staff to achieve a healthy and safe environment and to take reasonable care of themselves and others. Neglect of health and safety regulations will be regarded as a disciplinary matter.

Whenever a member of staff notices a health or safety problem, which they are not able to put right, they must immediately report to the appropriate person named above.

Daily contact, regular staff meetings and health and safety meetings provide consultation between management and employees.

Other health and safety areas are managed by:

* Safety training and Safety inspections
* Investigating accidents
* Monitoring the maintenance of equipment
* Risk assessments and Accident Form audits
* Daily Room Health/Safety checks and Cleaning Rota

#### Fire drill procedure

All staff, long term visitors and students at induction have details shared with them relating to fire safety, including information as to where to find specific room evacuation advice.

On discovering a fire

1. Staff and team leaders must CALMLY raise the alarm by shouting and breaking the alarm glass
2. Immediately evacuate the building following set procedure
3. Using the nearest safest exit lead the students out and congregate at the marked assembly point.
4. Anyone with special needs must be given assistance to vacate the building.
5. Manager or duty manager to check all rooms, toilets, corners, etc
6. Close all doors behind you.
7. **DO NOT re-enter the building until the fire brigade say it is safe to do so.**

The Manager is to:

1. Pick up the student’s register, emergency contacts list, mobile phone and visitor book
2. Telephone emergency services: dial 999 and ask for the fire service
3. Go to the FIRE ASSEMBLY POINT - safe place clear of the building - check the students against the register
4. Account for all adults. The manager **must** assume **ANYONE** not at the assembly point is still in the building.

• **Do not try to collect personal belongings on evacuating the building**

##### • Do not attempt to go back in and fight the fire

• **Do not attempt to go back in if any students or adults are not accounted for** • **Advise the fire services of anyone missing.**