

Policies and Procedures

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ANTI-BRIBERY CORRUPTION POLICY

Introduction

At Eventcover Education Ltd we appreciate the importance of ethical behaviour to our relations with stakeholders and we are proud of our high ethical standards, but we cannot be complacent about the threat of bribery and corruption in our business. Our first business principle deals with 'integrity in corporate conduct' which commits us to implement anti-corruption policies and procedures. Our second business principle 'ensuring openness and transparency' commits us never to engage in bribery, any form of unethical inducement or payment including facilitation payments and 'kickbacks'. This policy is part of those commitments.

The UK Bribery Act 2010 and the US Foreign Corrupt Practices Act 1977 create offences and penalties for bribery and corruption. The UK Bribery Act 2010 creates a corporate offence of failure to prevent bribery, and requires Eventcover Education Ltd to implement 'adequate procedures' to prevent bribery.

This policy sets out the responsibilities of Eventcover Education Ltd people and Eventcover Education Ltd businesses in preventing bribery and corruption and how we will implement 'adequate procedures' to do so.

In developing this policy reference has been made to Transparency International's 'Business Principles for Countering Bribery'.

Definition

For the purposes of this policy, bribery occurs when one person offers, pays, seeks or accepts a payment, gift, favour, or a financial or other advantage from another to influence a business outcome improperly, or to induce or reward improper conduct.

Bribery and corruption – whether involving government officials, or commercial entities, including joint ventures – can be direct or indirect through third parties like agents, brokers and joint venture partners. It includes facilitation payments even though in some countries facilitation payments are legal.

Scope

Under the UK Bribery Act 2010, Eventcover Education Ltd is required to put procedures in place to prevent bribery by any individual or organisation that performs services for or on behalf of Eventcover Education Ltd.

Consequently, this policy applies to every employee, contractor, director and officer in every wholly-owned Eventcover Education Ltd company and in every joint venture company under Eventcover Education Ltd control.

Contractors, consultants or suppliers who are our agents or who are working on our behalf or in our name, through outsourcing of services, processes or any business activity, will be required to act consistently with this policy when acting on our behalf. Independent contractors, consultants or suppliers will be made aware of this policy as it applies to our people in their dealings with them. Our responsible procurement and supplier management policy will also continue to apply to suppliers. Joint venture companies not under Eventcover Education Ltd control and joint venture partners are encouraged by Eventcover Education Ltd to adopt a similar policy, and adequate procedures, to prevent bribery.

Policy

Eventcover Education Ltd does not tolerate any form of bribery or corruption.

You must not offer, pay, make, seek or accept a personal payment, gift or favour in return for favourable treatment or to gain any business advantage. You must follow the anti-bribery and corruption laws to which you and Eventcover Education Ltd are subject, remembering that UK anti-bribery and corruption laws apply wherever you are operating.

You are liable to disciplinary action, dismissal, legal proceedings and possibly imprisonment if you are involved in bribery and corruption.

You must ensure people who work for and with you understand bribery and corruption is unacceptable.

You must comply with Eventcover Education Ltd's procedures for the prevention of bribery and corruption.

Adequate procedures

Anti-bribery and corruption is a business priority. Eventcover Education Ltd shall regularly and systematically identify bribery and corruption risks in its business and implement adequate risk-based procedures aimed at preventing bribery and corruption occurring including:

- Communication – We will communicate this policy and relevant guidance to employees across the Group, through our established internal communication channels. We will also communicate this policy to our suppliers, contractors and business partners and wider stakeholders.
- Training – We will ensure that those within the scope of the policy receive training appropriate to their activities and the associated risks.

- Books and records – We will maintain adequate books and records which properly and fairly document all financial transactions. We will maintain written evidence to record compliance with this policy.
- Audit – Our internal control systems will be subject to regular internal and independent audit to provide assurance that they are effective in countering bribery and corruption.
- Mergers and acquisitions – Through due diligence we will prevent the acquisition of bribery and corruption related liabilities.
- Business relationships – We will ensure that our business partners – including contractors, suppliers, agents, brokers and joint venture partners – are fit to do business with.
- Supply chain – We will address bribery and corruption risk in our supply chain including by ensuring that payments made for goods and services are reasonable.
- Conflicts of interest – Gifts and hospitality – We will address conflicts of interest and the risks created by gifts and hospitality through the implementation of our internal policies.
- Government officials – We will implement procedures applicable to our (or our agents', or those suppliers in our supply chains') dealings with government officials, political parties and related persons or organisations.

Responsibilities

The Chief Executive is the Board director with primary accountability for our anti-bribery and corruption efforts and shall report the results of adherence to this policy at least annually to the Eventcover Education Ltd Board of Directors.

Business unit Managers are accountable for implementing this policy within their business units.

Reporting actual or potential violations and seeking guidance

You must report actual, potential or suspected corruption in Eventcover Education Ltd or by any individual or organisation with whom Eventcover Education Ltd does business. Failure to do so may result in liability for Eventcover Education Ltd and for you personally.

You must report any request for an improper payment, or any indication that a person might be making corrupt payments or that a person has an intention or plan to violate this policy.

You have a similar obligation to report any information or knowledge of any hidden fund or asset, of any false or artificial entry in Eventcover Education Ltd's books and records, or any payment that circumvents Eventcover Education Ltd's internal financial processes.

Reports must be made immediately. Your report may be made to the Manager of your business unit or on an anonymous basis using our main office landline.

If any instance of bribery or corruption is identified, an investigation will take place under the guidance of the management or his or her nominee.

You can also contact your manager or use the landline to seek advice on anti-bribery and corruption issues or to make suggestions for how we could improve our anti-bribery and corruption policy and procedures.

Monitoring and review

The Eventcover Education Ltd Executive Committee is responsible for engaging Internal Audit to independently assess compliance with this policy.

The Eventcover Education Ltd Executive Committee will report annually on compliance with this policy to the Group Audit Committee, which will make

an independent assessment of the adequacy of the policy and disclose any material non-compliance in the Annual Report to shareholders. The Eventcover Education Ltd Executive Committee may also make an independent assessment of the adequacy of the policy in response to an event such as an instance of bribery.

APPEALS PROCEDURE

Stage 1

Where a student disagrees with the assessment given he/she must explain the reasons for this with the assessor concerned as soon as possible after receiving the assessment decision (in most circumstances this will be immediately after the assessment decision).

The assessor must consider this and provide clear feedback on the decision following a re-evaluation of the evidence and discussion. A response must be provided within 5 working days. Stage 1 of the candidate appeal form must be completed and the student's assessment record amended if appropriate. Agreement at this stage ends the appeal process.

Stage 2

If the student is still unhappy with the decision, the assessor must notify the Internal Verifier within two days of the end of the Stage 1 process and forward the original assessment record, evidence and appeal form. The Internal Verifier will examine the evidence including the opinion of another assessor and candidate.

The Internal Verifier will then re-consider the assessment decision, complete Stage 2 of the appeal form and provide the student with the reconsidered decision within 10 working days of receiving the appeal. With no agreement at this stage, the process would then go to a panel.

Stage 3

At this stage the Internal Verifier would forward relevant details to Curriculum Quality Manager who must then convene a full Appeals Panel within 10 working days of the completion of the Stage 2 process. This panel would comprise of the Head of Centre, Curriculum Quality Manager, Internal Verifier, External Verifier and Assessor. Records of all appeals must be logged and held at the Peterlee Office (Quorum of 3 must be in attendance).

This decision would then be final and the student informed within a further 5 working days, both orally and in writing. The student, however, still have the right of appeal to the Awarding Body and all records of appeals are logged as evidence.

CANDIDATE AT RISK ASSESSMENT POLICY

Eventcover Education seeks to monitor candidates at risk from non-completion of their educational programmes and endeavours to do everything possible to ensure the maximum achievement on its work based programmes.

The following outlines the risk monitoring routine for all candidates following our programmes.

- *If the candidate does not arrive for assessment at work, the candidate will then be placed on the at-risk register.*
- *If the assessor feels the candidate is experiencing difficulty in fulfilling the criteria outlined in the specification to achieve the qualification the candidate will be placed on the register.*
- *If the employer feels the candidate is at risk of leaving the company then the procedure will again be taken.*
- *If the candidate feels incapable of fulfilling the criteria outlined in the specification then they can be placed on the register if not in agreement of support.*
- *If the candidate is non-compliant with the assessment procedure the candidate will then be placed on the at-risk register.*

COMMUNICATION STRATEGY

Eventcover Education Mission Statement:

Provide quality training, assessment and guidance to those working or who aspire to work in the Cultural Sector.

Communication Goal

To communicate the company's offer to prospective candidates

Channel

- Internet – Website, NAS, Social Media
- Email – contact email on all advertising flyers
- Personal Networks – Job Centres, Employers, Training Providers in other sectors
- Meetings

Frequency

Constantly throughout the academic year dependent on funding restrictions as indicated by Managing Director

Communication Goal

Candidate Feedback

Channel

- Written feedback to candidates in training handbooks

- Verbal feedback during assessments – digitally recorded
- One-to-one progress review sessions & EAG

Frequency

Constantly throughout the academic year

Communication Goal

Assessor Feedback

Channel

- IQA reports via the EECMS or paper based (email)
- Zoom sessions
- Standardisation Meetings

Frequency

Formative and Summative as stated on IV Strategy. At the start of a new qualification offer and during the academic year. Additional meetings to be held on the guidance of the IQA if issues are highlighted which need attention

Communication Goal

Funding College Feedback

Channel

SAR data

Frequency

Annually

Communication Goal

Awarding Body Feedback

Channel

During EQA & monitoring visits

Frequency

Dependent on qualifications being offered, volume of learners and EQA strategies of different Awarding Bodies. Eventcover Education will comply with all Awarding Body requests for information.

COMPLAINTS HANDLING POLICY

Help us to put things right

Eventcover Education Ltd is committed to delivering an efficient and professional public service. We aim to provide prompt, courteous, helpful, open and informative advice in response to every approach made by a member of public. We are always keen to hear the views of our customers, particularly the general public, about our performance generally – what we do right and what we do wrong.

We recognise that, like all organisations, from time to time things can go wrong, and we do not provide the Standards of Service that we have set ourselves. We are especially keen to hear about such instances since they provide us with an opportunity to put things right and to learn from our mistakes. That way, we can get it right next time.

Types of complaint handled

Handling complaints quickly, fairly and helpfully is a key part of our approach to service delivery. Examples of complaints about a service provided by Eventcover Education might include:

- dissatisfaction with the way in which we respond to an enquiry, or the time that we took to respond;
- a perceived injustice because of alleged maladministration on our part;
- a denial of a request for information made under the Code of Practice on Access to Government Information;

- dissatisfaction with the way in which our land, property or other assets are maintained; or
- dissatisfaction with the response to a request for our services to be provided in a different format.
- Sometimes things go wrong and Eventcover Education does not provide the quality of service expected. When this happens we will endeavour to:
 - ensure that making a complaint is as easy as possible;
 - treat a complaint seriously whether it is made in writing by letter, via fax, email or by telephone;
 - deal with it promptly, politely and where appropriate, informally (for example, by telephone);
 - include in our response an apology where we have got things wrong, an explanation of the position, or information on any actions taken; and
 - learn from complaints, use them to improve our service, and publish the information

How to make a complaint

You can make a complaint in writing by letter, via fax, email or by telephone. If you are emailing, please let us know if a reply by email is acceptable and, if not, please provide a telephone number or full postal address.

Complaints should normally be directed to the member of staff with whom you have been dealing. This will give them the opportunity to explain what actions have been taken and to try to sort things out with you. If you would prefer, you can ask the member of staff for the name of their line manager and direct your complaint to them.

What happens next?

We will use our best endeavours to:

- treat complaints thoroughly, fairly and politely, and investigate them sensitively; and
- respond promptly.

Our target for replying to complaints is 15 working days from the date of receipt. If it is not possible to give you a full reply within this time – for instance because detailed investigation is required – we will give you an interim response, telling you what is being done to deal with your complaint, and when you can expect the full reply and from whom.

Our first response to your complaint should resolve your problem; however, if you are unhappy with our reply, or need further help, you can write to Eventcover Education Complaints Officer who will consider the issues afresh, and try to resolve them.

Our Complaints Officer is Lisa Robinson.

CONFLICT OF INTEREST POLICY

Definition:

A conflict of interest is a situation in which an individual has competing interests or loyalties. A conflict of interest can exist in several kinds of situations:

- With a public official whose personal interests conflict with his/her professional position
- With an employee who works for one company but who may have personal interests that compete with his/her employment
- With a person who has a position of authority in one organisation that conflicts with his or her interests in another organisation
- With a person who has conflicting responsibilities
- A personal interest can be financial or non-financial in nature

Examples:

- A member of staff is related to a learner within the provision,
- The Manager of the provision has a close friendship with one of the families
- A member of staff has a close relationship with the registered body of the provision (i.e., proprietor, Manager)
- A member of staff holds a second employment
- A member of staff has connection with families within their workplace through social networking

- A member of staff conducting an investigation into alleged malpractice is related to one of the Learners accused of malpractice

A close relationship is defined as such by virtue of association, which is a family relationship, personal partnership, civil partnership or marriage. This may also apply to close friendships, guardianships (Godparent) or business partner.

Principles for effective Professional practice within the workplace

- No employee should allow their outside activities to interfere with their work. They should not allow any conflicts between their duties or their private interest to affect their ability to carry out their duties effectively.
- No employee should make use of or exploit the provision, their connection with the provision or information obtained in the course of their duties to further their own private interest
- No employee should act in a manner likely to bring the provision into disrepute or effect the reputation of the business.
- Adults should be aware that behaviour in their personal lives may impact upon their work with learners. Adults should understand that the behaviour and actions of their family members may raise questions about their suitability to work with children, young people and vulnerable adults.

- Employees have a duty to disclose any potential or apparent conflict of interest which may affect their ability to carry out their role. Any employee who believes that they may have a conflict of interest should consult their Manager and complete a declaration of conflict-of-interest form.
- Any conflicts of interest will be reported to awarding bodies as appropriate. Reporting to be completed in line with awarding body requirements.
- Eventcover has a duty to take reasonable steps to prevent conflict of interests within the workplace.

DATA PROTECTION POLICY

Eventcover Education Ltd DATA PROTECTION POLICY (the "Policy")

PART I

STATEMENT ON DATA PROTECTION AND EMPLOYEES

Eventcover Education is committed to using all reasonable endeavours to ensure compliance with the requirements of the Data Protection Act 1998 (the "DPA"). Consequently, Eventcover Education requires you to be aware of the purposes for which Eventcover Education will process your personal information (Part 1 of this Policy) and the obligations that both Eventcover Education and its employees are under when processing personal data. (Part II of this Policy).

1. Definitions

For the purpose of understanding this Policy, the following definitions have the following meanings:-

1.1 "personal data" is defined in Section 1, Part 1 of the DPA and includes any information from which a living individual can be identified, either on its own or together with other information which is or is likely to come into the possession of Eventcover Education. This definition also covers expressions of opinion about individuals and indications of the intentions of Eventcover Education or any other person in respect of individuals.

Therefore, personal data includes information such as telephone numbers, names, addresses (including e-mail addresses), sound and image data (for example photographs and voice recordings), indications of status and title as well as remarks about individuals - if the identity of the individual can be ascertained from such information.

1.2 "sensitive personal data" is defined in Section 2, Part 1 of the DPA and includes information relating to racial or ethnic origin, political opinions, religious beliefs or beliefs of a similar nature, trade union membership,

physical or mental health or condition, sexual life, offences or alleged offences, information relating to any proceedings for offences committed or allegedly committed by data subjects.

1.3 "processing" is defined in Section 1, Part 1 of the DPA and means obtaining, recording, or holding data or carrying out any operation or set of operations on the data including: organisation, adaptation or alteration of the information or data; or retrieval, consultation or use of the information or data; or disclosure of the information or data by transmission, dissemination or otherwise making available; or alignment, blocking, erasure or destruction of the information or data.

For the purposes of the DPA, personal data will be caught by the DPA, if it is processed in:

- i. an automated fashion (for example: by main frame computers, PCs, word-processors, electronic memory typewriters, electronic mail (e-mail) or filing systems, laptops, computer hardware, computer software and Internet accounts); and/or
- ii. a manual fashion, which includes a set of information relating to individuals which is structured according to criteria which allows easy access to specific personal data (for example: card indices or manual files of client, employee or supplier data which is stored in a structured fashion).

1.4 "data subject" means the individual who is the subject of personal data which is being processed by Eventcover Education (for example: clients, employees, supporters, recruits and suppliers of Eventcover Education).

1.5 "Information Commissioner" means the UK Information Commissioner responsible for implementing and overseeing the DPA.

2. Processing of Employee Data by TC

2.1 As specified in your Statement of Written Particulars Eventcover Education may, from time to time, process personal data about you for the following purposes:-

- a. Statement of Written Particulars - for completing and updating your Statement of Written Particulars in relation to your employment with Eventcover Education and your Terms and Conditions of Service and generally for the administration and management of your employment with Eventcover Education and/or Eventcover Education's business.
- b. Payroll Pension and Accounts - for calculating and paying employee remuneration and pensions and keeping accounts relating to the activities of Eventcover Education.
- c. Benefits - to assist you to make use of the benefits specified in your Statement of Written Particulars and Terms and Conditions of Service. For these purposes, Eventcover Education may, once you have elected to make use of such benefits, make certain information contained in your personal data available to the organisations who administer the aforementioned benefits, where such information is regarded by Eventcover Education as necessary to provide you with the required benefits.
- d. Back-up - to ensure the security and accuracy of the data processed by Eventcover Education.
- e. Business Development - this may include the disclosure of certain information contained in your personal data to potential or existing clients, customers, partners, contractors, suppliers and/or fellow employees (including your name, title and office contact details) for the purposes of marketing or other business related activities of Eventcover Education and/or ensuring client, customer, supplier and employee satisfaction or otherwise for the promotion and/or development of Eventcover Education's business. Such personal data may be disclosed in written, electronic or other form including on an Eventcover Education Extranet or a third party Extranet to which Eventcover Education has access for the purposes described above.
- f. Employee Administration and Management - this may include sensitive personal data about you where this is necessary to comply with legislation and/or your Statement of Written Particulars and/or Terms and Conditions of Service and/or Eventcover Education employee administration policies.

Examples of purposes for which personal data relating to you may be processed in the administration, management and carrying out of your employment include (but are not limited to):-

Recruitment activities;

Administration of absence records, including sick leave and sick pay, monitoring sickness absences and attendance and manpower planning;

Administration and maintenance of personnel records, payroll and other benefits;

Administration of holiday and other absence records such as maternity leave, parental leave, paternity leave, time off for dependents;

Equal opportunities matters including the operation of the Equal Opportunities Policy;

Carrying out performance appraisals and development reviews;

Disclosure to prospective employers;

The pursuit of disciplinary and grievance matters;

Recording the commission or alleged commission of any offence;

The provision of information to any government body or agency for legitimate purposes including social security and income tax.

g. Prevention and Detection of Crime - this may include information relating to offences or alleged offences, and information relating to any proceedings for offences committed or allegedly committed for the purpose of the prevention and/or detection of crime.

h. Monitoring and Promotion of Equal Opportunities and Trade Union Membership - this may involve sensitive data about you, such as religious beliefs or similar beliefs, ethnic origin and trade union membership.

i. Corporate Finance, Mergers and Acquisitions - this may include the disclosure of certain personal information about you to other individuals and

organisations with whom Eventcover Education may consider entering into commercial transactions.

j. Regulatory and Professional Requirements - this may include the disclosure of certain information within your personal data to regulatory and professional bodies.

k. Administration of Membership Records - to administer your membership with clubs, associations and other organisations for business and/or professional purposes.

l. Assessment and Collection of Taxes and Other Revenue - to administer Eventcover Education and employee revenue and tax obligations which will require the disclosure of certain information to the Inland Revenue amongst others.

m. Training and Career Development - to administer employee training and oversee career development which may require the disclosure of certain personal data (including contact and qualification details) to training organisations.

n. Health & Safety - to comply with prevailing health and safety legislation and Eventcover Education policies. This may include the processing of certain sensitive data, such as mental and physical health details about you.

o. Internal Communications - to facilitate communications between Eventcover Education's employees, certain personal data, such as your photograph, CV, status and office contact details may from time to time be included in any internal communications and/or on an Eventcover Education Intranet and/or in internal newsletters, magazines or other similar publications.

p. Monitoring - please note that Eventcover Education may (at any time and without notice) monitor or keep a record of communications sent and/or received over Eventcover Education's IT resources (including: computer hardware, software, telephones, fax machines, voicemail, e-mail, building

and facility access and CCTV systems) and/or record your use of Eventcover Education's IT resources in order to:

detect and/or prevent crime;

establish the existence of business related facts. (e.g., in your absence to establish whether or not you have responded to a client's e-mail);

ascertain whether you and/or Eventcover Education are complying with Eventcover Education's rules and policies (including, but not limited to, this Policy) and also with legal and/or regulatory obligations to which you and/or Eventcover Education are subject;

ascertain whether communications are relevant to Eventcover Education's activities (e.g. checking incoming messages in your absence to ensure that Eventcover Education's standards of service do not suffer);

ascertain and/or demonstrate whether you are attaining standards which are achieved or ought to be achieved by you (e.g. compliance with service obligations);

carry out maintenance of IT resources and to monitor for viruses and/or any other programme which has contaminating and/or destructive properties;

investigate or detect unauthorised use of the IT resources; and

protect the vital interests of you as an individual including without limitation concerns regarding your whereabouts and/or safety.

Eventcover Education will, in conducting such monitoring activities, use all reasonable endeavours to comply with the UK Information Commissioner's best practice guidelines and to respect your privacy and that of third parties using the IT Resources.

Please note that where Eventcover Education identifies the commission or alleged commission of a specific criminal activity and determines that there is a need to obtain evidence of this activity by monitoring, which would be prejudiced by informing employees about any such monitoring, Eventcover

Education will conduct covert monitoring by means and for a period of time which Eventcover Education considers necessary to obtain evidence of the criminal activity. Any such activity may be conducted with the knowledge of and/or in conjunction with law enforcement authorities.

q. CCTV - please note that Eventcover Education may use CCTV monitoring on its premises to:

protect your personal safety and the safety of the public when they are on Eventcover Education's premises;

investigate, detect and/or prevent crime and to apprehend/prosecute offenders; and/or

ascertain whether employees are complying with behavioural requirements and standards specified in their employment contracts, Eventcover Education rules and policies and statutory or regulatory obligations to which employees and/or Eventcover Education are subject.

Any such CCTV monitoring will be carried out in accordance with the DPA. To do this, Eventcover Education will rely on the CCTV Code of Practice issued by the Information Commissioner. If you would like to see a copy of the CCTV Code, please contact the Head of Human Resources or the Head of Legal Services.

Eventcover Education may sometimes disclose CCTV footage to third parties such as law enforcement authorities, solicitors and the Courts for the purposes listed above at 2.1(p). Eventcover Education may also disclose CCTV footage to the media if it believes that this will assist in the apprehension of criminals.

Other parties who may come into contact with the CCTV footage which Eventcover Education records, include individuals or organisations operating the CCTV system on Eventcover Education's behalf and organisations providing Eventcover Education with footage editing services.

2.2 Your personal data will, on occasion, be made available to third parties who perform services for Eventcover Education (e.g. solicitors, auditors, banks, agents etc) or to inward investors or other potential business partners. These individuals may be situated outside of the United Kingdom. Any such disclosures will be subject to written contracts, confidentiality requirements and security arrangements where necessary in order to protect your personal data.

2.3 Eventcover Education operates an Intranet to which Eventcover Education employees, and potentially contractors and temporary staff may be given access for the purpose of facilitating communication between such individuals and promoting Eventcover Education's business... You should be aware that certain of your personal data (e.g. names and office details) may be included on any Intranet and Extranets.

2.4 Eventcover Education operates Internet websites to provide information about the activities of Eventcover Education. This may include the disclosure of certain of your personal data. The information placed on these websites may be downloaded and transferred anywhere in the world. Information placed on the Internet may be accessed by various individuals within and outside Eventcover Education. We therefore require you to be aware that if being placed on the Eventcover Education Internet websites, you are in fact consenting to this data being transferred outside of the United Kingdom and being viewed by third parties.

2.5 In accordance with the DPA, you may request access to your personal data which is being processed by Eventcover Education and/or request Eventcover Education not to process certain of your personal data and/or to amend or update any personal data relating to you which is inaccurate. This will also include CCTV footage on which you appear and from which you can be identified. Any such request must be made in writing to the Quality Manager, a copy of which will be retained on your personnel file. Where you have exercised any of the above-mentioned rights, Eventcover Education will comply with your request, subject to any lawful requirements and/or exemptions granted to Eventcover Education under the DPA.

If you would like more information about your right to request access to your personal data (including CCTV footage), held by Eventcover Education who may charge you a fee (subject to the statutory maximum) for supplying you with your personal data please see the leaflet called "Personal Information Access Form". These forms are available from the company

If you have any comments, concerns or complaints about Eventcover Education's use of your personal data, CCTV and/or Eventcover Education's compliance with the Information Commissioner's codes of practice, please contact the Quality Manager. Any such complaints will be dealt with in accordance with Eventcover Education's grievance procedure which can be found on the Eventcover Education Intranet.

PART II

EMPLOYEES' OBLIGATIONS WHEN PROCESSING PERSONAL DATA

When processing any personal data for and on behalf of Eventcover Education, we require you to comply with the following obligations:

1. Process personal data fairly and lawfully

This means that we require you:

1.1 not to mislead or deceive data subjects as to the identity of who will be holding their personal data and for what purposes such data will be processed by Eventcover Education.

1.2 to be aware that personal data cannot be processed by Eventcover Education unless, either:

1.2.1 the data subject has given his/her consent; or

1.2.2 the processing is necessary for the performance of a contract or for the entering into of a contract with the data subject; or

1.2.3 the processing is necessary for compliance with any legal obligation to which Eventcover Education is subject (other than an obligation imposed by a contract); or

1.2.4 the processing is necessary to protect the vital interest of the data subject; or

1.2.5 the processing is necessary for the administration of justice; or

1.2.6 the processing is necessary for the purposes of legitimate interests pursued by Eventcover Education, except where the processing is unwarranted by reason of prejudice to the rights or legitimate interests of the data subject.

1.3 to comply with all procedures which Eventcover Education put in place in order to process personal data fairly and lawfully;

1.4 to exercise a high degree of care and security when required to process any personal data and in particular sensitive personal data;

1.5 be aware that at least one of the conditions set out below must be met when processing sensitive personal data:

a. the data subject must have given his/her explicit consent; or

b. the processing must be necessary to enable Eventcover Education to exercise its legal rights or obligations in connection with employment; or

- c. the processing must be necessary to protect the vital interest of the data subject (e.g. in life and death situations); or
- d. the processing must be carried out for the purpose of monitoring equal opportunities in respect of race or ethnic origin; or
- e. the information contained in the personal data has been made public as a result of steps deliberately taken by the data subject; or
- f. the processing must be necessary for the purposes of establishing, exercising or defending the legal rights of Eventcover Education; or
- g. the processing must be necessary for the administration of justice; or
- h. the processing must be necessary for medical purposes and is undertaken by a health professional (or equivalent).

2. Personal data must only be obtained and processed for one or more specified and lawful purposes

2.1 This means that you should only be processing data during the course of your employment with Eventcover Education for purposes which are either obvious to the data subject; or have been made apparent to the data subject and are reflected in Eventcover Education's Data Protection registration or notification.

2.2 Eventcover Education's Data Protection registration or notification is available from Eventcover Education's Data Protection Officer. If you become aware of any additional purposes (other than those set out in the registration or notification), for which personal data is being processed by Eventcover Education, you should report the additional purposes to Eventcover Education's Data Protection Officer.

3. Personal data must be processed in accordance with certain data quality requirements

3.1 Personal data must be adequate, relevant and not excessive in relation to the purpose or purposes for which such data is processed.

3.2 Personal data must be accurate and where necessary, up to date.

3.3 Personal data processed for any purpose or purposes must not be kept for longer than is necessary for that purpose or those purposes.

3.4 In relation to points 3.1, 3.2 and 3.3 above, Eventcover Education require you to:-

- a. comply with the Eventcover Education Document Retention Policy;
- b. update information which appears to you to have become inaccurate and/or out of date; and
- c. only collect, disclose and/or further process personal data which is necessary for a particular business related purpose.

4. Personal data must be processed in accordance with the rights of data subjects under the DPA

4.1 You should be aware that data subjects have rights under the DPA with respect to the processing of their personal data by Eventcover Education, including where this consists of CCTV footage. In order to assist Eventcover Education to comply with data subjects' rights, you are required to inform the Head of Human Resources/ Eventcover Education's Data Protection Officer when:

- a. any request is made by a data subject for access to or for a copy of information about themselves which is being processed by Eventcover Education. Any such request must not be complied with, without consent from Eventcover Education's Data Protection Officer.
- b. any request is made by a data subject to refrain from starting to process or from any further processing of the data subject's personal data;
- c. a data subject requests further information about the logic involved in a decision which has been taken by Eventcover Education by automated means (without any human input) about the data subject (e.g. by a computer).

5. Security arrangements

5.1 You must comply with all appropriate technical and organisational security measures taken by Eventcover Education against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data processed by Eventcover Education including the Eventcover Education Information Security and associated policies to be found on the Eventcover Education Intranet.

5.2 In particular, you must comply with all other organisational policies issued to you by Eventcover Education including, but not limited to the Eventcover Education Information Security and associated policies and any other security access and disclosure procedures notified to you.

6. Disclosure of personal data

6.1 YOU MUST NOT DISCLOSE ANY PERSONAL DATA PROCESSED BY TC UNLESS SUCH DISCLOSURE:

- a. is with the consent of Eventcover Education (such consent to be provided by Eventcover Education's Data Protection Officer or the Head of Human Resources) or in circumstances where Eventcover Education would agree to the disclosure; and
- b. is to an organisation and/or individual whose identity you have ascertained and are certain is entitled to obtain such information; and
- c. is necessary for the business purposes of Eventcover Education; and
- d. is, where necessary, protected by sufficient security safeguards and/or confidentiality obligations

6.2 The consent of Eventcover Education can be assumed, where the disclosure is required for:

- a. the prevention or detection of crime; or
- b. the apprehension or prosecution of offenders or

- c. the assessment or collection of any tax or duty or compliance with any obligation of a similar nature; or
- d. the purpose of discharging statutory functions on Eventcover Education; or
- e. under any enactment, or by any rule of law or by the order of a Court; or
- f. the purpose of, or in connection with, any legal proceedings (including prospective legal proceedings); or
- g. the purpose of establishing, exercising or defending legal rights.

7. Transfer of personal data outside of the European Economic Area (EEA) 1

7.1 You should be aware that there are restrictions on Eventcover Education's ability to transfer personal data to a territory outside of the EEA, unless:-

- a. such territory is regarded by the European Commission as providing an adequate level of protection for such personal data (currently only Switzerland, Hungary, Canada and Argentina); or
- b. consent has been obtained from the data subject in question; or
- c. agreements are in place to offer adequate protection to the data; or
- d. the transfer is in order to give effect to a contract for or with the data subject; or
- e. the recipient company/organisation, if based in the USA, is certified as a member of the "safe harbor" program in the USA.

7.2 If you are unsure about whether you are entitled to transfer personal data in an automated or manual fashion out of the EEA on behalf of Eventcover Education, consult the Head of Human Resources.

8. Liability

8.1 Eventcover Education will regard a failure by you to comply with the contents of this policy as a disciplinary offence.

8.2 You need to be aware that in your capacity as an employee of Eventcover Education it is a criminal offence under Section 55 of the DPA if you knowingly or recklessly obtain or disclose personal data (or the information contained in such data), or procure the disclosure to another person of that information, without the consent of Eventcover Education.

9. Confidentiality

9.1 You should be aware that the obligations placed on you as a result of the DPA and this compliance policy are in addition to the duty of confidentiality which you owe to Eventcover Education in respect of all information (including personal data) processed by you about Eventcover Education, its clients, employees, suppliers and any other data subjects.

9.2 You must keep all personal data which you process on behalf of Eventcover Education completely secret and confidential and must not disclose any such information unless authorised to do so by:

9.2.1 in the case of personal data relating to Eventcover Education employees, the Directors or Management;

9.2.2 in the case of personal data relating to persons other than Eventcover Education employees.

9.2.3 in the case of any personal data this policy document and other security documents referred to in this policy and/or contained in your Conditions of Service.

10. Termination

You should be aware that all information (including personal data) processed by you, during your employment with Eventcover Education (whether in a manual or automated fashion), is and will remain the property of Eventcover Education. On termination of your employment with Eventcover Education, you must promptly return the original and any copies (whether in manual or automated form) of any information including personal data) obtained by you during your employment to Eventcover Education.

11. Updates to this Policy

This Policy will change from time to time to keep abreast of legislation in this area. You are therefore required to refer to this Policy on a regular basis. You will be informed of any changes to the policy.

12. Further assistance

12.1 If you are involved day to day in handling personal data you should ensure you are familiar with this policy

12.2 If you have any questions about this Policy or are in doubt as to whether or not you and/or Eventcover Education are entitled to process any particular personal data, you should check with your manager

12.3 If you become aware of any breach of this Policy or of the DPA you should notify a Director.

E – SAFETY POLICY

Background & Purpose

1.1 New technologies have become integral to the lives of young people in today's society, both within classrooms and in their lives outside school.

1.2 The Internet and other digital and information technologies are powerful tools, which open up new opportunities for everyone. Electronic communication helps tutors and students learn from each other. These technologies can stimulate discussion, promote creativity and increase awareness of context to promote effective learning. Young people should have an entitlement to safe Internet access at all times.

1.3 The requirement to ensure that young people are able to use the Internet and related communications technologies appropriately and safely is addressed as part of the wider duty of care to which all who work in Eventcover are bound. Eventcovers e-Safety policy should help to ensure safe and appropriate use. The development and implementation of such a strategy should involve all the stakeholders in a young person's education including classroom tutors, support staff, parents, and the students themselves.

1.4 The use of these exciting and innovative tools in Eventcover and at home has been shown to raise educational standards and promote student achievement. However, the use of these new technologies can put young people at risk within and outside the company. Some of the dangers they may face include:

- Access to illegal, harmful or inappropriate images or other content • Unauthorised access to / loss of / sharing of personal information • The risk of being subject to grooming by those with whom they make contact on the Internet.
- The sharing / distribution of personal images without an individual's consent or knowledge

- Inappropriate communication / contact with others, including strangers
- Cyber-bullying
- Access to unsuitable video / Internet games
- An inability to evaluate the quality, accuracy and relevance of information on the Internet
- Plagiarism and copyright infringement
- Illegal downloading of music or video files
- The potential for excessive use which may impact on the social and emotional development and learning of the young person.

1.5 Many of these risks reflect situations in the off-line world and it is essential that this e-Safety policy is used in conjunction with other business policies (e.g. behaviour, anti-bullying and young person protection policies).

1.6 As with all other risks, it is impossible to eliminate those risks completely. It is therefore essential, through good educational provision to build students' resilience to the risks to which they may be exposed, so that they have the confidence and skills to face and deal with these risks.

1.7 Eventcover must demonstrate that it has provided the necessary safeguards to help ensure that they have done everything that could reasonably be expected of them to manage and reduce these risks. The e-Safety policy that follows explains how we intend to do this, while also addressing wider educational issues in order to help young people (and their parents / carers) to be responsible users and stay safe while using the Internet and other communications technologies for educational, personal and recreational use.

Scope

1.8 This policy applies to all members of Eventcover (including staff, students, parents / carers, visitors) who have access to and are users of the ICT systems, both in and out of Eventcover.

1.9 The Education and Inspections Act 2006 empowers to regulate the behaviour of students when they are off site and empowers members of staff to impose disciplinary penalties for inappropriate behaviour. This is pertinent to incidents of cyber-bullying or other e-Safety incidents covered by this policy, which may take place outside of the classroom, but is linked to membership of the training provider.

1.10 Eventcover will deal with such incidents within this policy and associated behaviour and anti-bullying policies and will, where known, inform parents / carers of incidents of inappropriate e-Safety behaviour that take place out of the classroom.

Roles and Responsibilities

1.11 The following section outlines the roles and responsibilities for e-Safety:

1.12 Senior Leaders:

- Eventcover is responsible for ensuring the safety (including e-Safety) of students, though the day to day responsibility for e-Safety will be delegated to the E-Safety Co-ordinator / Officer
- Senior Leaders are responsible for ensuring that the E-Safety Coordinator / Officer and other relevant staff receive suitable CPD to enable them to carry out their e-Safety roles and to train other colleagues, as relevant

- Senior Leaders will ensure that there is a system in place to allow for monitoring and support of those in a course who carry out the internal e-Safety monitoring role. This is to provide a safety net and also support to those colleagues who take on important monitoring roles
- The Senior Leadership Team / Senior Management Team will receive regular monitoring reports from the E-Safety Co-ordinator / Officer
- Members of the Senior Leadership Team / Senior Management Team should be aware of the procedures to be followed in the event of a serious e-Safety allegation being made against a member of staff.

1.13 E-Safety Coordinator / Officer

- leads on e-Safety
- takes day to day responsibility for e-Safety issues and has a leading role in establishing and reviewing the school e-Safety policies / documents
- ensures that all staff are aware of the procedures that need to be followed in the event of an e-Safety incident taking place
- provides training and advice for staff
- liaises with SCE
- liaises with ICT technical staff
- receives reports of e-Safety incidents and creates a log of incidents to inform future e-Safety developments
- meets regularly with E-Safety SGC member to discuss current issues, review incident logs and filtering / change control logs
- reports regularly to Senior Leadership Team

1.14 Technical support staff

These staffs are responsible for ensuring:

- that the ICT infrastructure is secure and is not open to misuse or malicious attack
- that users may only access Eventcovers networks through a properly enforced password protection policy
- Eventcovers filtering policy is applied and updated on a regular basis
- that he / she keeps up to date with e-Safety technical information in order to effectively carry out their e-Safety role and to inform and update others as relevant
- that monitoring software / systems are implemented and updated as agreed in Eventcovers policies

1.15 Tutors and Support Staff

are responsible for ensuring that:

- they have an up to date awareness of e-Safety matters and of the current e-Safety policy and practices
- they have read and understood JSP 740 and signed the company Staff Acceptable Use Policy (AUP)
- they report any suspected misuse or problem to the appropriate person for investigation
- digital communications with students (e-mail / Virtual Learning Environment (VLE) / voice / VTC / MOVI) should be on a professional level and only carried out using official business communication systems
- e-Safety issues are embedded in all aspects of the curriculum and other activities

- students understand and follow the e-Safety and acceptable use policy
- students have an understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- they monitor ICT activity in lessons, extracurricular and extended activities within the classroom
- they are aware of e-Safety issues related to the use of mobile phones, cameras and hand held devices and that they monitor their use and implement current policies with regard to these devices
- in lessons where Internet use is pre-planned students should be guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in Internet searches

1.16 Designated senior person for young person protection

Staff should be trained in e-Safety issues and be aware of the potential for serious young person protection issues to arise from:

- sharing of personal data
- access to illegal / inappropriate materials
- inappropriate on-line contact with adults / strangers
- potential or actual incidents of grooming
- cyber-bullying

1.17 Students / pupils

- are responsible for using the ICT systems in accordance with the Student Acceptable Use Policy, which they will be expected to sign before being given access to school systems

- have a good understanding of research skills and the need to avoid plagiarism and uphold copyright regulations
- need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- Will be expected to know and understand company policies on the use of mobile phones, digital cameras and hand held devices. They should also know and understand company policies on the taking / use of images and on cyber-bullying
- should understand the importance of adopting good e-Safety practice when using digital technologies out of the classroom

Policy Statements

1.18 Education – students

- A planned e-Safety programme should be provided as part of ICT / PHSE / other lessons and should be regularly revisited – this will cover both the use of ICT and new technologies in and beyond the classroom
- Key e-Safety messages should be reinforced as part of a planned programme of assemblies and tutorial / pastoral activities
- Students should be taught in all lessons to be critically aware of the materials / content they access on-line and be guided to validate the accuracy of information
- Students should be helped to understand the need for the student AUP and encouraged to adopt safe and responsible use of ICT, the Internet and mobile devices both within and outside of the classroom
- Students should be taught to acknowledge the source of information used and to respect copyright when using material accessed on the Internet

- Rules for use of ICT systems / Internet will be posted in all rooms
- Staff should act as good role models in their use of ICT, the Internet and mobile devices

1.19 Education & Training – Staff

It is essential that all staff receive e-Safety training and understand their responsibilities, as outlined in this policy. Training will be offered as follows:

- A planned programme of formal e-Safety training will be made available to staff. An audit of the e-Safety training needs of all staff will be carried out regularly. It is expected that some staff will identify e-Safety as a training need within the performance management process
- All new staff should receive e-Safety training as part of their induction programme, ensuring that they fully understand the school e-Safety policy and Acceptable Use Policies
- JSP 740, together with this e-Safety policy will be presented to and discussed by staff in staff / team meetings / INSET days

1.20 Training – SGC

- SGC should have an awareness of e-Safety and how this is applied and implemented in Eventcover
- SGC should be invited to take part in e-Safety training / awareness sessions

1.21 Technical – infrastructure / equipment, filtering and monitoring SCE
Technical Support Officer will be responsible for ensuring that the company's infrastructure / network is as safe and secure as is reasonably possible and

that policies and procedures approved are implemented. It will also need to ensure that the relevant people named in the above sections will be effective in carrying out their e-Safety responsibilities.

- There will be regular reviews and audits of the safety and security of ICT systems
- Servers, wireless systems and cabling must be securely located and physical access restricted
- All users will have clearly defined access rights to ICT systems
- All users will be provided with a username and password
- The “master / administrator” passwords for the ICT system, used by the Network Manager (or other person) must also be available to the nominated senior leader
- Users will be made responsible for the security of their username and password, must not allow other users to access the systems using their log on details and must immediately report any suspicion or evidence that there has been a breach of security
- Eventcover has provided appropriate user-level filtering through the use of the (insert name) filtering programme
- In the event of the Network Manager (or other person) needing to switch off the filtering for any reason, or for any user, this must be logged and carried out by a process that is agreed by the nominated senior leader
- Requests from staff for sites to be added or removed from the filtered list will be actioned by the Network Manager
- ICT technical staff regularly monitor and record the activity of users on the ICT systems and users are made aware of this in the Acceptable Use Policy. (Eventcover may wish to add details of the monitoring programmes that are used)

- (possible statement) Remote management tools are used by staff to control workstations and view users activity
- Appropriate security measures are in place (Eventcover may wish to provide more detail) to protect the servers, firewalls, routers, wireless systems, work stations, hand held devices etc from accidental or malicious attempts which might threaten the security of the company's systems and data
- An agreed policy is in place (to be described) for the provision of temporary access of "guests" (e.g. trainee teachers, visitors) onto the system
- An agreed policy is in place (to be described) that allows staff to / forbids staff from installing programmes on office workstations / portable devices
- An agreed policy is in place (to be described) regarding the use of removable media (e.g. memory sticks / CDs / DVDs) by users on office workstations / portable device
- The company's infrastructure and individual workstations are protected by up to date virus software
- Personal data cannot be sent over the Internet or taken off the site unless safely encrypted or otherwise secured

1.22 Use of images

- When using digital images, staff should inform and educate students about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they should recognise the risks attached to publishing their own images on the Internet e.g. on social networking sites

- Staff are allowed to take and use images to support educational aims, but must follow policies concerning the sharing, distribution and publication of those images. Those images should only be taken on the company's equipment, the personal equipment of staff should not be used for such purposes
- Care should be taken when taking images that students are not participating in activities that put them at risk or bring the individuals or the company into disrepute
- Students must not take, use, share, publish or distribute images of others without their permission
- Photographs published on the website, or elsewhere that include students will be selected carefully and will comply with good practice guidance on the use of such images
- Students' full names will not be used anywhere on a website or blog, particularly in association with photographs
- Written permission from the student will be obtained before photographs of students are published on the website
- Student's work can only be published with the permission of the student

Social Networking

1.23 Acceptable use of social networking sites

1.24 The widespread availability and use of social networking applications bring opportunities to understand, engage and communicate with our audiences in new ways. It is important that we are able to use these technologies and services effectively and flexibly. However, it is also important to ensure that we balance this with our duties to our services users and partners, our legal responsibilities and our reputation.

1.25 For example, our use of social networking applications has implications for our duty to safeguard young people and vulnerable adults.

1.26 The requirements set out below aim to provide this balance to support innovation whilst providing a framework of good practice. Social networking applications include, but are not limited to:

- Blogs
- Online discussion forums
- Collaborative spaces
- Media sharing services e.g. Youtube
- 'Micro logging' applications e.g. Twitter

1.27 Many of the principles of this policy also apply to other types of online presence such as virtual worlds and RSS aggregation services and the use of all such services must be discussed with the Communications Officer before use.

1.28 Legislation

1.29 The following legislation - enforceable against public sector employees including staff - must be considered when using the internet or email:

- Human Rights Act 1998
- Regulation of Investigatory Powers Act 2000 (RIPA)³
- Data Protection Act 1998
- Freedom of Information Act 2000
- Copyright, Designs and Patents Act 1988, amended by the Copyright and Related Rights Regulations 2003
- Computer Misuse Act 1990, amended by the Police and Justice Act 2006

- Obscene Publications Act 1959, Protection of Children Act 1988, Criminal Justice Act 1988

1.30 These Acts are concerned with material that might be

- criminal,
- cause harm to young people or
- be otherwise unlawful.

EMPLOYEE GRIEVANCE PROCEDURE

1. Scope and Purpose

1.1 This procedure applies to staff employed at Eventcover Education Limited under a Contract of Employment. It does not apply to independent contractors working within the Organisation.

1.2 The Organisation recognises that from time to time employees may wish to seek redress for grievances relating to their employment. The purpose of this procedure is to encourage open communication between employees and their managers to ensure that questions and problems arising during the course of their employment can be aired and, where possible, resolved quickly and to the satisfaction of all parties involved.

1.3 The procedure is relevant where an individual or a group of employees has a grievance about a matter relating to their employment. Separate procedures covering cases of harassment, regrading and collective disputes are available and should be used in these situations. The Grievance Procedure cannot be used to appeal against action taken under the Disciplinary Procedure as it contains its own appeal process.

2. Key Principles and Definitions

2.1 This procedure is designed to comply with the Instrument and Articles of Government and with advice from ACAS and other advisory bodies on dealing with grievances.

2.2 At every stage in the procedure an employee who has a grievance, or those against whom a grievance is raised, will have the right to be accompanied by a representative of a recognised trade union or a work colleague.

2.3 Although the timescales in this procedure may be varied by agreement, the overall aim should be to settle the grievance as near to the point of origin and as quickly as possible.

2.4 An employee shall not be victimised or discriminated against as a result of bringing a complaint under the Grievance Procedure.

3. The Procedure

3.1 The formal stages of the procedure are set out below:

Stage 1 – Informal Discussions

3.2 If an employee has a grievance relating to his/her employment, the matter should be raised initially with the employee's line manager. The grievance should be raised orally in the first instance. In the event that the grievance relates to the line manager who would normally deal with a grievance at this stage, the grievance should be referred to the line manager's own manager.

3.3 The line manager will attempt to resolve the complaint informally. He/she shall enquire into the grievance and will discuss it with the complainant and will advise the complainant of his/her decision in writing within 10 working days after the complaint is received. Most grievances will be resolved at this stage.

3.4 If the grievance is against the line manager, the grievance should be submitted to the Director

Stage 2

3.5 If the grievance has not been resolved at Stage 1, the complainant may refer the grievance to the next manager or Director, and completing, a

grievance form. The complainant must complete the form by providing full details of the complaint and should address it to the Director.

3.6 The Director or his/her representative will, as soon as possible (and in any event, within 10 working days of receipt of the form) arrange a meeting at which all parties to the grievance will attend. The employee may be represented and accompanied at the meeting by a trade union representative or work place colleague.

3.7 The employee bringing the grievance or his/her representative will be given the opportunity to explain the nature of the grievance, submit verbal/written evidence and call appropriate witnesses.

3.8 The Director or his/her representative will have the right to ask questions of the parties in attendance.

3.9 The Director or his/her representative will consider all of the matters raised at the meeting and will issue a written decision within 10 working days. Copies of the decision will be sent to all of the parties.

3.10 If the grievance is against the Director, the grievance should be submitted, in writing, to any other Director as described under Stage 3.

Stage 3

3.11 If the complaint is not resolved to the satisfaction of the employee at Stage 2, the grievance may be submitted, in writing, to another Director within 10 working days of receipt of the decision reached at Stage 2.

3.12 The employee will be entitled to have a meeting with another Director and to be accompanied and represented by a trade union representative or work place colleague.

3.13 Another Director will consider the grievance and may be supplied with all of the documentation submitted in relation to the earlier stages of the procedure.

3.14 The Director will issue and send to all parties, copies of a written decision within 10 working days of receiving the grievance in writing. Such decision will be final.

3.15 If the grievance is against the Director, the grievance should be submitted in writing to the Company.

4. Roles and Responsibilities

4.1 It is the responsibility of all managers to ensure that grievances are dealt with promptly and, where possible, matters are resolved effectively.

4.2 Any manager involved in the formal stages of the Grievance Procedure will normally, where practicable, have appropriate training and/or experience in grievance procedures and a thorough awareness of this specific procedure.

5. Monitoring and Review of the Procedure

5.1 The Director is responsible for ensuring the formal monitoring and review of the procedure in line with relevant legislation, Codes of Practice, case law and good employer practice. Any changes to the procedure will be subject to consultation with representatives of recognised trade unions and will be agreed by the organisation.

5.2 The Director will monitor the implementation of the procedure to ensure fair and consistent treatment of employees.

Appendix A – Procedure for the Conduct of a Grievance Hearing

NB. The employee(s) called to the hearing may be accompanied by a representative of a recognised trade union or a work colleague independent of the situation and, where identified in the procedure, they may contribute on his/her behalf. In the case of a grievance involving more than one employee, the employees should nominate a spokesperson to present the case if not otherwise represented. Either party may request an adjournment at any time.

Introduction

1. The manager or director or his/her representative will introduce all those present and outline the procedure for the hearing including the use of adjournments.

The Case for the Grievance

2. The employee(s) or their representative will present the case in support of the grievance, which may include statements by witnesses.
3. The Organisation representative may ask questions of the employee(s) or witness(es).
4. The manager or director convening the hearing or his/her representative may ask questions of the employee(s) or witness (es).
5. The employee may re-examine his/her witnesses.

The Response to the Grievance

6. The Organisation representative will present the response to the grievance, which may include statements by witnesses.

7. The employee(s) or their representative may ask questions of clarification of the Organisation representative.
8. The manager or director convening the hearing or his/her representative may ask questions of the Organisation representative or witness (es).
9. The Organisation representative may re-examine his/her witnesses.

Summing Up

10. The employee(s) or their representative will sum up the case in support of the grievance introducing no new evidence.
11. The Organisation representative will sum up the case against the grievance introducing no new evidence.

Adjournment

12. Both parties will withdraw to enable the manager or director convening the hearing or his/her representative to consider the evidence presented and reaches a decision.
13. If it is necessary to recall any representative or witness for clarification, both parties will be recalled.

Communicating the Decision

14. If possible, the decision will be communicated orally immediately after the hearing. If this is not possible, the manager or director convening the hearing or his/her representative will advise both parties of the timescale for reaching a decision and how this will be communicated.

ENVIRONMENTAL POLICY

Eventcover Education is determined to serve the best interests of the community by protecting and promoting the improvement of the environment in all the areas of our business.

Eventcover Education will ensure that environmental priorities are integrated into the decision making process of the company and will seek to:

- Make the most efficient use of energy.
- Reduce the need for movement of people and goods.
- Minimise all forms of pollution.
- Avoid waste and encourage recycling of resources.
- Avoid environmental damage by assessing the possible impact of work undertaken.
- Promote a sense of responsibility and understanding for the environment.
- Review and improve our performance each year.

EQUAL OPPORTUNITES POLICY

1. Introduction

Eventcover Education recognises that it is essential to provide equal opportunities to all persons without discrimination. This policy sets out the organisation's position on equal opportunity in all aspects of employment, including recruitment and promotion, and provides guidance and encouragement to employees at all levels to act fairly and prevent discrimination on the grounds of sex, race, marital status, disability as defined by the Disability Discrimination Act 1995, part-time and fixed term contract status, age, sexual orientation or religion.

2. Definition of Discrimination

(a) Discrimination can be direct or indirect. Both forms of discrimination must be avoided.

(b) Direct discrimination occurs when one person is treated less favourably than another on grounds relating to sex, race, marital status, age, disability, sexual orientation or religion.

(c) Indirect discrimination occurs where a requirement is imposed which can be complied with by a smaller proportion of persons of a particular sex, race, marital status, disability, age, part-time or fixed term contract status, sexual orientation or religion, than persons in another group and which is not objectively justifiable in the given situation. Examples include:

seeking job applications only from persons under 27 years of age and with five years' post-graduate experience;

demanding technical qualifications for a job which are not strictly necessary;

sending only full time employees on training courses.

3. Statement of policy

(a) It is the policy of Eventcover Education to ensure that no job applicant or employee receives less favourable treatment on the grounds of sex, race, marital status, disability, age, part-time or fixed term contract status, sexual orientation or religion, or is disadvantaged by conditions or requirements that cannot be shown to be justifiable. The organisation is committed not only to its legal obligations but also to the positive promotion of equality of opportunity in all aspects of employment.

(b) Eventcover Education recognises that adhering to the Equal Opportunities Policy, combined with relevant employment policies and practices, maximises the effective use of individuals in both the organisation's and employees' best interests. The company recognises the great benefits in having a diverse workforce with different backgrounds, solely employed on ability.

(c) The application of recruitment, training, and promotion policies to all individuals will be on the basis of job requirements and the individual's ability and merits.

(d) All employees of the organisation will be made aware of the provisions of this policy.

4. Recruitment and promotion

(a) Advertisements for posts will give sufficiently clear and accurate information to enable potential applicants to assess their own suitability for the post. Information about vacant posts will be provided in such a manner that does not restrict its audience in terms of sex, race, marital status, disability, age, part-time or fixed term contract status, sexual orientation or religion.

(b) Recruitment literature will not imply a preference for one group of applicants unless there is a genuine occupational qualification which limits the post to this particular group, in which case this must be clearly stated.

(c) All vacancies will be circulated internally.

(d) All descriptions and specifications for posts will include only requirements that are necessary and justifiable for the effective performance of the job.

(e) All selection will be thorough, conducted against defined criteria and will deal only with the applicant's suitability for the job. Where it is necessary to ask questions relating to personal circumstances, these will be related purely to job requirements and asked to all candidates.

5. Employment

(a) Eventcover Education will not discriminate on the basis of sex, race, marital status, disability, age, part-time or fixed term contract status, sexual orientation or religion in the allocation of duties between employees employed at any level with comparable job descriptions.

(b) Eventcover Education will put in place any reasonable measures and/or adjustments within the workplace for those employees who become disabled during employment or for disabled appointees.

(c) All employees will be considered solely on their merits for career development and promotion with equal opportunities for all.

6. Training

(a) Employees will be provided with appropriate training regardless of sex, race, marital status, disability, age, part-time or fixed term contract status, sexual orientation or religion.

(b) All employees will be encouraged to discuss their career prospects and training needs with their Line Manager.

7. Monitoring

(a) It is the responsibility of the Directors to ensure that all aspects of this policy are kept under review and are operated throughout the organisation.

(b) Where it appears that applicants/employees are not being offered equal opportunities, circumstances will be investigated to identify any policies or criteria which exclude or discourage certain employees and, if so, whether these are justifiable.

8. Grievances and victimisation

(a) Eventcover Education emphasises that discrimination is unacceptable conduct which may lead to disciplinary action under the organisation's Disciplinary Procedure.

(b) Any complaints of discrimination will be pursued through the organisation's Grievance Procedure

ESF RETENTION POLICY

Retention of documents

Eventcover Education will ensure that:

Where income has been derived using monies from the European Social Fund or any payments made under its contract with the prime contractor of the SFA where the monies are deemed to be match-funded for a European Social Fund Co-Financing Project, all documents will be retained until 31 December 2030.

Electronic retention of documents

Eventcover Education will keep electronic information for the same length of time as required for paper copies. It is Eventcover Education's responsibility to ensure that the electronic copy of the documentation can be relied on for audit purposes.

Eventcover Education has assigned storage to archive all original documents relating to ESF funding. All previous years' paperwork will be boxed and stored, clearly labelled for future audits.

GDPR POLICY

May 2018

What personal information does Eventcover Education collect and what lawful reasons do we have to collect and process it?

Name, date of birth, gender, residency, Details of previous educational history, qualifications, and employment. Details of learning difficulties or disabilities, or medical conditions.

We need this data to fulfil our Legal Obligations to share with the DfE and other agencies, and to fulfil our Public Task of providing students with the most appropriate learning opportunities and the best possible education, training and pastoral support to meet their goals. We also use this data to carry out our obligations to monitor and improve the way we carry out public tasks.

We will also process details of medical conditions which do not directly impact on learning if they are needed to protect the vital interests of yourself or other learners.

Contact details – address, phone numbers, emails

We need this data to fulfil our Legal Obligations to share with the DfE and other agencies. We also need it to communicate with our students in order to carry out our public task to provide education. We will seek consent where we wish to use this information for other purposes such as marketing courses or surveys.

Attendance information, including sessions attended, absences, reasons for absence Progress information including assessment details and marks.

Details of tutor meetings, learning and behavioural targets and summaries.
References, details of applications for jobs, courses at other educational institutions

We need this data to fulfil our Public Task of providing students with the most appropriate learning opportunities and the best possible education, training and pastoral support to meet their goals. We also use this data to carry out our obligations to monitor and improve the way we carry out public tasks.

For students aged under 18 on 1st September at the start of the academic year, we will ask the student for consent to share attendance, progress and other information which impacts on their education, with parents and carers.

Criminal convictions which are relevant to safeguarding or the safety of others. All criminal convictions, and DBS checks for all students on courses such as Early Years or Social Work, where required by law in order to meet course requirements

We will require criminal convictions to be disclosed where we deem this to be in the vital interests of the student themselves or others. Advice will be provided as to whether criminal convictions need to be collected and processed. For certain courses with safeguarding implications, convictions must be disclosed and DBS checks will be carried out.

Parent/Carers contact details

For students aged under 18 on 1st September at the start of the academic year, and for those aged 18-25 with an Educational Health Care Plan, we will require contact details of a parent or carer to be used in emergencies to protect the vital interest of the learners

Household details – including number in household, income and benefits claimed, and bank account details

This will be required when the funding partner is under a legal obligation to collect and share this information with the government or its agencies, or when it is required to assess eligibility for fee remission.

Students who apply for financial support such as bursaries will be required to provide further details and evidence. This is required to meet our legal requirements to administer financial support fairly and to collect and retain evidence to support our decisions, and to enable us to administer payments

Photos and images

Photos or videos taken for marketing or education purposes will not be published without consent

Why do we collect personal information?

The organisation collects and processes personal data relating to its learners to effectively manage your learning and to meet its statutory obligations as a Training Provider. We are committed to being transparent about how we collect and use that data and to meeting its data protection obligations.

We use learner data to:

- Manage the delivery of learning
- Support teaching and learning
- Provide pastoral care and other learner support
- Assess and improve the quality of our services
- Comply with the law in terms of data sharing and the Equality Act
- To invoice any necessary fees payable

Special Category Data and Convictions

Under GDPR, certain types of data are termed “special category”. These include ethnicity, medical conditions and disabilities. Where these are collected on behalf of the DfE or other government agencies, the reasons for processing under article 9 of the GDPR are explained in their privacy statements. Links to these are provided in this document. In addition, we need the data to carry out our obligations under social protection laws (GDPR article 9b) and where it is necessary for reasons of substantial public interest (GDPR article 9g). In certain cases it may be required to support your own vital interests (health, safety), or the vital interests of others. Where these reasons do not apply, we would seek your consent to collect and process the information

Where do we obtain your personal data?

Most of the information above is collected directly from yourself via an application or enrolment form. However some information such as previous qualifications or special needs may be collected from other organisations such as the DfE, the LRS, the Local Education Authority, or your previous school.

How and where do we store data?

Data will be stored in a range of different places, including the student information management systems, on paper, stored secure places, or on electronic documents within a secure network

Why does the organisation need to process personal data?

We need to process data so we can provide you with the highest standards of education and training we are able to give, and to meet its legal obligations from government organisations including the DfE and HEFCE. Data regarding employment status and benefits is required to assess your eligibility for fee remission or support.

Where the organisation processes other special categories of personal data, such as information about ethnic origin, disability or health, this is done for the purposes of equal opportunities monitoring and monitor our service provision to improve our services to specific groups. We also use the data so we can personalise the provision to each learner to provide him or her with best possible opportunities to succeed. Any information that has been supplied under the lawful basis of “consent”, can be withdrawn at any time, by contacting the data protection officer.

Contact details will not be used for marketing or survey purposes without your consent, which can be withdrawn at any time. However Eventcover Education or our Funding Partner will use the contact information to contact you in order to carry out our duties to you, for example to notify you of a change of course date, and also to obtain data where legally required, such as destination surveys.

Who has access to data?

Your information may be shared internally, including our funding partners who need the data to provide services to the learner. Funding Partners provide the Enrolment Forms and other documentation to collect the

required information. This will include special categories of data where appropriate.

Where an employer has paid all or part of a student's fees, we will share information with them about course details, attendance and progress.

We share data with previous schools in order for them to compile destination information, and we share with educational institutions and employers where you request us to do so, in order for us to provide the educational history they require in order to process your application.

We are required by law to provide the LEA with information about students aged 16-18, including contact information, dates of arrival and leaving, and the course followed.

Do we process data outside the EEA?

We will not transfer your data to countries outside the European Economic Area.

How does the organisation protect data?

The organisation takes the security of your data seriously. The organisation has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. The Data Protection policy is available to view on our website, or can be obtained in a paper version by contacting our reception.

For how long does the organisation keep data?

All data collected and processed on behalf of the ESFA or HEFCE will be held for as long as we are legally required to do so, currently until at least 2030.

Other data will be held as long as is necessary to fulfil our duty as a Training Provider. Any data provided by consent may be deleted on request. Details are available on the website, or from reception

What rights do you have?

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the stated purposes of processing
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing. We will only use "legitimate interests" as grounds for processing where the processing is not in relation to our core purpose of education.
- Prevent processing for the process of direct marketing, although we will continue to contact where necessary in order to provide you learning – for example to notify you about a change of class. Also we need to contact you to obtain destination information as required by ESFA or OfS.

If you would like to exercise any of these rights, please contact the data protection officer at admin@eventcover.co.uk

Who can I complain to?

If you believe that we have not complied with your data protection rights, please contact the Data Protection Officer in the first instance. If you are unhappy with the response, you have the right to contact the Information Commissioner by going to their website (ico.org.uk) or by ringing 0303 123 1113

What if I do not provide personal data?

Failure to provide data required to meet lawful obligations (except where consent is required) will result in us not being able to enrol you as a student. Failure to provide other information (except that requiring consent), for example learning difficulty information, may result in Eventcover Education being unable to provide the standard of education and training that we wish to provide.

Does Eventcover Education use automated decision-making?

No decisions are not based solely on automated decision-making.

Glossary of Acronyms

Dfe – Department for Education

ESFA – Education and Skills Funding Agency
HEFCE – Higher Education Funding Council
OfS – Office for Student

HESA – Higher Education Statistical Agency

LRS – Learner Registration Service

LEA – Local Education Authority

GDPR – General Data Processing Regulation

Data Sharing Agreements

Eventcover Education and our Funding Partners will share data with government agencies such as ESFA, OfS, LRS, as required by law. Eventcover Education and our Funding Partners will share data with the LEA as required by law, for students aged 16-18 on 1st September at the start of the academic year. It will also share information with the appropriate council and other statutory other agencies when required for safeguarding reasons. It will provide local district councils with information regarding enrolled courses when requested, lawful in the public interest. For students aged 16-18, it will provide information about enrolled courses to their previous schools to enable them to track destinations in the public interest.

Where special category data is shared with organisations contracted by the Funding Partner to provide support to the student, the data will only be shared where it is used solely for that purpose. This is lawful in the public interest (GDPR article 9g).

Eventcover Education will also share data with awarding organisations such as City and Guilds, NCFE, HABC and BIIAB in order for them to carry out their duties.

The ESFA and LRS provide short privacy notices, provided below. We also provide a link to their full privacy notices, together with OfS, City and Guilds and Pearsons (BTEC) below. Links to the privacy notices of other organisations with whom we are required to share personal data, either by law, or

in order to carry out our public task, e.g. awarding bodies, will be published on our website, or made available on request.

INITIAL ADVICE AND GUIDANCE POLICY

All Eventcover Education staff are committed to providing an accurate Information, Advice and Guidance (IAG) Service.

Overview

Eventcover provide an independent information advice and guidance service to anyone who wishes to access training programmes. This includes any new learners or those already in training.

Eventcover supports the concept of lifelong learning and endeavours and in providing quality information, advice and guidance services, Eventcover help learners make informed choices about the training courses or programmes that are right for them. The IAG process is a continual process throughout learners' programmes.

The quality of service is monitored through performance data and feedback from users.

Objectives

Eventcover achieved the Matrix IAG standard and strives to provide information, advice and guidance that is:

- Timely and in a form that is easily understood
- Independent, confidential and focused on the needs of the individual
- Able to provide access to a range of agencies for specialist support
- Free from stereotyping physical or cultural barriers for users and in accordance with Eventcover's Equal Opportunities Policy
- Easily accessible and clearly defined
- Free of charge to all users

- Subject to evaluation and continuous improvement encouraging individuals to get the most from the process

Standards of Service

The service offers: -

- Open access to information on education, training and career opportunities
- An initial assessment to help identify individuals' skills and aptitudes
- A trained member of staff to discuss individual learner needs and aspirations and plan for the achievement of goals
- Signposting to other agencies who may be able to help learners achieve their goals
- The opportunity for learners to spend time with a member of staff to review and revisit their goals and discuss progress and next steps

Clients / learners can expect

- A service delivered to recognised national standards
- A clear explanation of the Information, Advice and Guidance Services offered
- Experienced staff who will treat them with respect and dignity
- A timely response to requests for information
- Up to date information on education, training and career opportunities
- Information on the cost of training and any funding which may be available to support the costs

- All information about them will be treated as strictly confidential in line with the Data Protection Act

How clients/learners can help us to improve the service

- By complaining promptly and in full if the service fails to give satisfaction.
- By telling us what we are doing well. Clients may tell us in person, by telephone or in writing.
- By completing feedback questionnaires
- By answering Information, Advice and Guidance questions when requested as part of the quality process.

INVIGILATION

All assessments must be conducted in line with the qualification awarding body examination and invigilation regulations. A copy of awarding body regulations must be available for each examination.

Instructions to Invigilators

On the day of the external assessment the invigilator will set up the room correctly ensuring:

- Candidates are spaced around the examination room in such a way to avoid malpractice
- A sign is to be placed outside of the exam room to indicate external assessment is in progress
- The exam room is to be free of all posters/materials that may be relevant to the external assessment
- All candidates must be able to see a clock without the need to turn around
- Start and finish times of external assessment must be clearly displayed
- Stationery and any specified items must be available to the candidates. All candidates must be informed of the items they'll need for the external assessment ie HB pencil, pen, dictionary, calculator etc.

Before the External Assessment ensure:

- The correct date, time and location for external assessment is showing on the exam booking
- The correct number of assessment papers are available
- All papers and invigilator registers and awarding body documents are available
- Check all candidates ID in line with awarding body requirements.

During the External Assessment ensure:

- Papers haven't been opened prior to the Invigilator entering the examination room
- Each candidate in the room has been given the correct paper/answer sheet
- The room and desks are set up to reflect the Regulations for the Conduct of External Assessment requirements
- The Invigilator has read out generic instructions to candidates from awarding body regulations
- Any disturbances/collusion are acted on and reported immediately to the awarding body
- The Invigilator's Register has been completed to reflect the candidates that attended and those that didn't attend, including any reasonable adjustments administered.

Following the External Assessment check:

- the Invigilator has collected all of the paperwork prior to candidates leaving the room all paperwork is accounted for
- Invigilator's register is signed and checked that it's completed
- all paperwork, including blank papers is placed in correct envelopes as per awarding body instructions

Invigilators must be alert and observe candidates at all times during the external assessment.

Invigilators must not read spare papers, books, any electrical devices or carry out any other activities during the external assessment or leave the assessment room without an Invigilator being present.

IQA STRATEGY / POLICY

The diverse nature of the courses and the satellite sites at which these are assessed and delivered bring to bear some challenging issues with regard to internal quality assurance. Additionally there are several assessors – both experienced and relatively inexperienced – who work on a flexible and somewhat ad hoc basis for the organisation with regard to assessment.

In view of this, the following strategy has been devised and adopted for three types of assessor:

1. New and/or unqualified assessors (Red)
2. Newly qualified and/or inexperienced assessors (Amber)
3. Well qualified and experienced assessors (Green)

This strategy relates to the assessments made across all units and types of evidence and implements the requirements of:

- C all candidates
- A all assessors
- M all methods of assessment
- E all elements of the qualification
- R all range requirements
- A all assessment locations

1. New and/or unqualified assessors (Red)

All new assessors either on site or at external venues will be subject to internal quality assurance where every candidate that has a unit assessed by this assessor is verified over a normal distribution across the range. In real terms the following is meant:

- Assessment decisions across ALL candidates assessed by inexperienced assessor
- Across ALL sites that the assessor is involved with
- Including ALL units
- Covering ALL types of evidence used

The strategy is to construct a matrix that addresses all the above variables and to pick at random one portfolio from each candidates assessed by the inexperienced assessor to be internally moderated.

Additionally the IQA will strive to:

- Conduct internal quality assurance meetings twice a year
- Conduct a standardisation meeting twice a year
- Observe each assessor at least twice a year in the workplace (formative quality assurance).

2. Newly qualified and/or inexperienced assessors (Amber)

All newly qualified and/or inexperienced assessors either on site or at external venues will be subject to an internal quality assurance where one

unit in five is verified across all candidates assessed by the assessor without duplication of candidates over a normal distribution across the range.

Additionally the IQA will strive to:

- Conduct internal quality assurance meetings twice a year
- Conduct a standardisation meeting twice a year
- Observe each assessor at least twice a year in the workplace (formative quality assurance).

3. Well qualified and experienced assessors (Green)

All well qualified and experienced assessors either on site or at external venues will be subject to an internal quality assurance where one unit in ten is verified across all candidates assessed by the assessor without duplication of candidates over a normal distribution across the range.

Additionally the IQA will strive to:

- Conduct internal quality assurance meetings twice a year
- Conduct a standardisation meeting twice a year
- Observe each assessor at least twice a year in the workplace (formative quality assurance).

LEARNER DISCIPLINE & SANCTION POLICY

Eventcover Education has a policy of positive behaviour management with our learners. Rather than responding to poor behaviour we will establish a culture of mutual respect through strategies that recognise and reward good behaviour. We have clear expectations when it comes to behaviour, these expectations are set out clearly in the candidate guide and all students are expected to meet them. Behaviour from students that falls short of our expectations will be dealt with quickly through the learner disciplinary procedure.

What are our expectations of student behaviour?

- To take reasonable care for the health and safety of yourself and others
- To cooperate with our staff by following their direction with regard to health and safety
- Act respectfully towards staff, other students and visitors
- To respect and not abuse, misuse, vandalise or deface, fire alarm points, fire extinguishers, first aid boxes and appropriate notices and signage
- In the event of the fire alarm sounding during any session to make their way directly to the designated assembly point for that area
- To report all accidents, no matter how small, to a member of our staff immediately

- To inform your assessor (in confidence) of any medical needs, or of any condition which might require special or emergency action
- Attend regularly and be punctual.
- Complete their work to the best of their ability and hand it in on time.
- Only smoke in designated areas.

We operate a **zero tolerance** policy in relation to the following forms of poor behaviour. We will take immediate action against any student found to have engaged in any of these actions and in the most serious cases this could lead to the exclusion of the student from their training programme.

- Bullying and harassment whether this is in person or over the internet, text messages or telephone
- Any form of discrimination, this includes making racist, sexist or homophobic comments or offensive comments about students or staff with a disability.
- Bringing illegal drugs, alcohol or offensive weapons into the premises or coming to training sessions under the influence of either.
- Putting young people or vulnerable adults at risk, whether this is physically, sexually or emotionally

It is everyone's responsibility to make sure that our expectations of student behaviour are consistently and fairly applied. It is our hope that through this constant positive reinforcement we will maintain a culture of mutual respect and at the same time avoid the necessity for students to go through formal disciplinary processes.

It is therefore important to thank students for picking up litter, holding doors open or being an active member of our community whether this behaviour is in the classroom or in the corridors. We should all show our students the respect that we expect from them. Therefore all members of staff are expected to reinforce good behaviour when we see it and challenge inappropriate behaviour when we encounter it.

If a student is in serious breach of the code of conduct, the contract agreed at the start of the training programme or continually engages in low level disruptive activity then we can instigate our formal disciplinary process this has three stages.

Informal Stage

In most cases it is most effective to deal quickly and at an informal level with incidents of minor misconduct. The member of staff dealing with the incident needs to be satisfied that the student or students involved are responsible for the inappropriate action. Staff will be expected to take action and bring the inappropriate behaviour to the attention of the student. A clear indication of future expectation needs to be made to the student.

In some circumstances this conversation may be recorded. The member of staff may inform their line manager. The purpose of this is to provide supportive information to colleagues to help monitor future behaviour in line with expectations.

Formal Verbal Stage

Where a student is alleged to have demonstrated persistent or re-occurring behaviour of an inappropriate but minor nature an interview will be set up and chaired by the course tutor or other appropriate line manager.

Warning One - Issued for consistent or fairly serious breaches of the student code of conduct. This triggers an immediate and informal discussion with the tutor. The tutor records the discussion and what is expected of them with the student and provides them with a copy signed by the student.

Formal Written Stage

Further examples of continued misconduct or allegations of a more serious misconduct may be investigated and dealt with at this formal written stage.

Warning Two - Issued if behaviour does not improve. This triggers a formal meeting, formal behaviour management plan agreed and signed by all parties. This warning will include clear expectation of future conduct. It may include practical actions to support this expectation. It will include potential consequences of future incidences of inappropriate behaviour, as set out in this policy & procedure, including possible suspension or permanent exclusion from the College.

The student will have an opportunity to respond to the complaint and state their case. The student has the right to appeal against such a decision. This appeal must be made in writing.

MALPRACTICE POLICY AND PROCEDURE

Malpractice consists of those acts which undermine the integrity and validity of assessment, the certification of qualifications and/or damage the authority of those responsible for conducting the assessment and certification.

Eventcover Education has a public duty to ensure that highest standards are maintained in the conduct of assessment. The proper discharge of this duty is essential to safeguard the legitimate interests of its students and the company's reputation.

Malpractice is taken very seriously. Eventcover Education will take action against any student who contravenes the policy through negligence, foolishness or by deliberate intent. Furthermore, Eventcover Education does not tolerate actions (or attempted actions) of malpractice by:

- Learners
- Centre Staff

Guidance to prevent or reduce learner malpractice

We always aim to take positive steps to prevent or reduce the occurrence of learner malpractice.

Below are examples of good practice followed:

- using the induction period and the student handbook to inform learners of the centre's policy on malpractice and the penalties for attempted and actual incidents of malpractice

- introducing procedures for assessing work in a way that reduces or identifies malpractice, eg video / audio assessments of candidates with assessors checking candidate photographic ID against information held by the Centre.

Centre staff malpractice

The following are examples of malpractice by Centre staff. The list is not exhaustive:

- alteration of assessment and grading criteria
- assisting learners in the production of work for assessment, where the support has the potential to influence the outcomes of assessment, for example where the assistance involves centre staff producing work for the learner
- producing falsified witness statements, for example for evidence the learner has not generated
- allowing evidence, which is known by the staff member not to be the learner's own, to be included in a learner's assignment/task/portfolio/coursework
- facilitating and allowing impersonation
- misusing the conditions for special learner requirements, for example where learners are permitted support, such as an amanuensis, this is permissible up to the point where the support has the potential to influence the outcome of the assessment
- failing to keep learner computer files secure
- falsifying records/certificates, for example by alteration, substitution, or by fraud

- fraudulent certificate claims, that is claiming for a certificate prior to the learner completing all the requirements of assessment
- failing to keep assessment/examination/test papers secure prior to the assessment/ examination/test

Dealing with Malpractice:

The overall responsibility of dealing with malpractice lies with the Management of Eventcover Education. As a part of procedure the alleged malpractice incident has to be reported to the awarding body in the case where the awarding body is external. Once the alleged malpractice is suspected, alleged person involved in the activity has to be informed in writing of:

- 1- Nature of alleged malpractice.
- 2- Possible consequences if malpractice is proven.

As a second step the individual is given a chance of explaining their point of view and also explained the appeals procedure where the decision is against them. The investigation is to be conducted in a fair and appropriate manner. Appropriate sanctions have to be levied according to the nature of incident. Malpractice has to be dealt through disciplinary procedures.



MODERN SLAVERY DECLARATION FORM

I confirm that the organisation named below fully complies with and abides by the Modern Slavery Act 2015.

Name:

Peter Hardy

Job Title:

Director

Organisation:

Eventcover Education

Company No:

5997086

Registered

Office

Address:

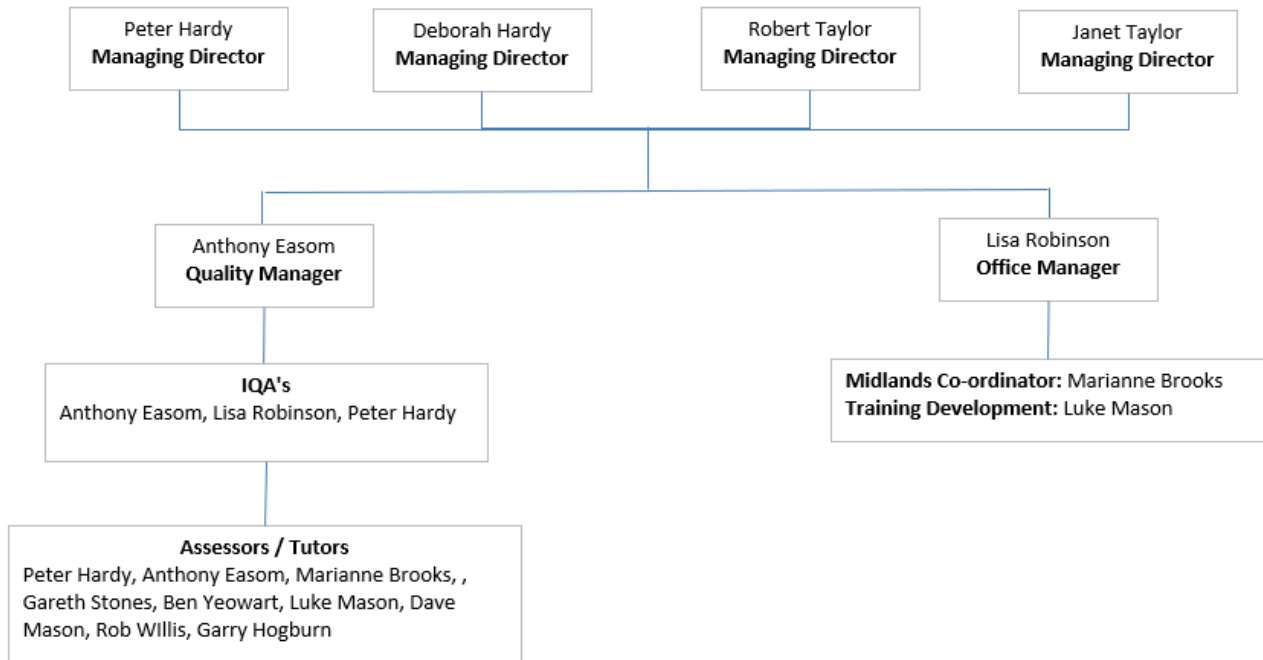
246 Park View, Whitley Bay, Tyne Wear, United Kingdom.
NE26 3QX.

Signed:

Date:

3/4/18

ORGANISATIONAL CHART



PRE-EMPLOYMENT CHECKS

Under the Immigration, Asylum and Nationality Act 2006 Eventcover Education has a duty to prevent illegal working by carrying out document checks to confirm if a person has the right to work in the UK.

Before you are able to work you must provide evidence of your right to work in the UK, your evidence will be checked and copies taken of your original documents.

Employee:

Lists of acceptable documents for right to work checks

List A

1. A passport showing the holder, or a person named in the passport as the child of the holder, is a British citizen or a citizen of the UK and Colonies having the right of abode in the UK.
2. A passport or national identity card showing the holder, or a person named in the passport as the child of the holder, is a national of a European Economic Area country or Switzerland.
3. A Registration Certificate or Document Certifying Permanent Residence issued by the Home Office to a national of a European Economic Area country or Switzerland.
4. A Permanent Residence Card issued by the Home Office to the family member of a national of a European Economic Area country or Switzerland.

5. A current Biometric Immigration Document (Biometric Residence Permit) issued by the Home Office to the holder indicating that the person named is allowed to stay indefinitely in the UK, or has no time limit on their stay in the UK.
6. A current passport endorsed to show that the holder is exempt from immigration control, is allowed to stay indefinitely in the UK, has the right of abode in the UK, or has no time limit on their stay in the UK.
7. A current Immigration Status Document issued by the Home Office to the holder with an endorsement indicating that the named person is allowed to stay indefinitely in the UK or has no time limit on their stay in the UK, together with an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.
8. A full birth or adoption certificate issued in the UK which includes the name(s) of at least one of the holder's parents or adoptive parents, together with an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.
9. A birth or adoption certificate issued in the Channel Islands, the Isle of Man or Ireland, together with an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.
10. A certificate of registration or naturalisation as a British citizen, together with an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.

List B – Group 1 Documents where a time-limited statutory excuse lasts until the expiry date of leave

1. A current passport endorsed to show that the holder is allowed to stay in the UK and is currently allowed to do the type of work in question.
2. A current Biometric Immigration Document (Biometric Residence Permit) issued by the Home Office to the holder which indicates that the named person can currently stay in the UK and is allowed to do the work in question.
3. A current Residence Card (including an Accession Residence Card or a Derivative Residence Card) issued by the Home Office to a non-European Economic Area national who is a family member of a national of a European Economic Area country or Switzerland or who has a derivative right of residence.
4. A current Immigration Status Document containing a photograph issued by the Home Office to the holder with a valid endorsement indicating that the named person may stay in the UK, and is allowed to do the type of work in question, together with an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.

List B – Group 2 Documents where a time-limited statutory excuse lasts for 6 months

1. A Certificate of Application issued by the Home Office under regulation 17(3) or 18A (2) of the Immigration (European Economic Area) Regulations 2006, to a family member of a national of a European Economic Area country or Switzerland stating that the holder is permitted to take employment which is less than 6 months old together with a Positive Verification Notice from the Home Office Employer Checking Service.

2. An Application Registration Card issued by the Home Office stating that the holder is permitted to take the employment in question, together with a Positive Verification Notice from the Home Office Employer Checking Service.
3. A Positive Verification Notice issued by the Home Office Employer Checking Service to the employer or prospective employer, which indicates that the named person may stay in the UK and is permitted to do the work in question

Evidence of right to work will also be checked using the Gov.uk website.

<https://www.gov.uk/legal-right-work-uk>

PREVENT STRATEGY

Aim

The aim of this strategy is to outline Eventcover Education's approach to supporting the national 'Prevent' agenda, linked to the safeguarding of our students and staff. This strategy is written with reference to the Prevent Duty contained within Section 26 of the Counter Terrorism and Security Act 2015. The Duty states that specified authorities including Further Education Colleges, in the exercise of their functions, must have 'due regard to the need to prevent people from being drawn into terrorism'.

The National Context

The National Prevent Strategy, published by the government in 2011, is part of the UK's overall counter-terrorism strategy known as CONTEST. The aim of the Prevent Strategy is to stop people becoming terrorists or supporting terrorism by focusing on the following 3 objectives;

- *challenging **ideology** that supports terrorism and those who promote it;*
- *protecting vulnerable **individuals** from being drawn into terrorism through appropriate advice and support;*
- *supporting sectors and **institutions** where there is a risk of radicalisation.*

The Prevent strategy recognises that people who are engaged in terrorist activities are often initially drawn into extremist narratives and beliefs and that these narratives (violent and non –violent) should be challenged to stop people moving from extremist groups or from extremism into terrorist related activity.

[The Counter Extremism Strategy 2015](#) defines **extremism** as; "the vocal or active opposition to our fundamental values, including democracy, the rule of

law, individual liberty and the mutual respect of different faiths and beliefs. We also regard calls for the death of our armed forces as extremist.”

Radicalisation is as defined in the Prevent Strategy as “the process by which a person comes to support terrorism and forms of extremism leading to terrorism”

The threat level for the UK is set by the Joint Terrorism Analysis Centre (JTAC). Threat levels are designed to give a broad indication of the likelihood of a terrorist attack.

The current threat level from international terrorism in the UK is severe, which means that an attack is highly likely.

The Counter Terrorism and Security Act 2015

On 1 July 2015, the Counter Terrorism and Security Act (CTSA) 2015 became statutory.

Section 26 of the Counter Terrorism and Security Act 2015 places a statutory Prevent duty on specified authorities in the exercise of their functions, to have ‘due regards to the need to prevent people from being drawn into terrorism’.

Prevent Duty Responsibilities

All staff including sub-contracted and agency staff, board members and volunteers within an organisation must understand their Prevent related responsibilities, especially in the context of Safeguarding. This will ensure the welfare of learners, staff, volunteers and visitors.

All staff, volunteers and board members should:

- *undertake appropriate Prevent duty training identified by leaders and managers*
- *understand the risk of radicalisation*
- *implement the Duty effectively*
- *know how to refer an individual who is vulnerable within our organisation*

Prevent Strategy

The Prevent Strategy will continue to tackle all forms of extremism and will continue to prevent radicalisation by identifying risk at the earliest possible stage by safeguarding individuals through appropriate support mechanisms.

Strategy objectives:

- *To continue to reinforce awareness of 'Prevent' agenda.*
- *To recognise current practice that supports the 'Prevent' agenda*
- *To support and protect vulnerable individuals from being drawn into terrorism through appropriate advice and support*
- *For staff to exemplify British values in their management, teaching and through general behaviours*
- *Opportunities in the curriculum are used to promote the British values to learners and build resilience*
- *Staff training is current and reviewed annually*
- *To ensure key policies and procedure reflect the prevent agenda where an institution has sub- contracted the delivery of courses, they should have robust procedures in place to ensure that the sub-contractor is aware of the Prevent duty and the sub-contractor is not inadvertently funding extremist organisations*
- *The ensure the prevent duty is integrated with sub-contractors and partner organisations*

Current practice which contributes to Prevent

- *The Safeguarding Policy features reference to the Prevent agenda to ensure it is recognised alongside all protective and preventative work we do to safeguard our students, visitors and members of staff.*
- *All learners complete Level 2 Certificate in Safeguarding and Prevent as part of the security programme*
- *Prevent and anti-terrorism are key assessment criteria in SIA Door Supervisor qualifications*
- *All staff undertake relevant Prevent training as required by the SIA and awarding bodies*
- *Prevent action plan is in place.*
- *British Values embedded into all teaching and learning sessions.*
- *Our work to promote Equality and Diversity within the College incorporates British values, contributes to good community relations and reduces the risk of radicalisation.*

Prevent Action Plan

Area of improvement	Responsibility	Progress
Ensure current risk assessment is in place and updated annually	Peter Hardy	
Update resources for teaching and learning	Anthony Easom	
All staff to update ACT Counter Terrorism online training	Vicky Gale	
Update online acceptable use policy for staff and learners	Vicky Gale	

REASONABLE ADJUSTMENTS AND SPECIAL CONSIDERATIONS POLICY

Introduction

This policy sets out the procedures that learners and tutors should follow when implementing reasonable adjustments and special considerations.

Reasonable adjustment

A reasonable adjustment helps to reduce the effect of a disability or difficulty that places the learner at a substantial disadvantage in the assessment situation. Reasonable adjustments must not affect the validity or reliability of assessment outcomes, but may involve:

- changing usual assessment arrangements
- adapting assessment materials
- providing assistance during assessment
- re-organising the assessment physical environment
- changing or adapting the assessment method
- using assistive technology.

Reasonable adjustments must be approved by the Internal Quality Assurer (IQA) and set in place prior to assessment commencing. It is an arrangement to give a learner access to a qualification. The work produced

following a reasonable adjustment must be assessed in the same way as the work from other learners.

Below are examples of reasonable adjustment. It is important to note that not all adjustments described below will be reasonable, permissible or practical in particular situations. The learner may not need, nor be allowed the same adjustment for all assessments. A reasonable adjustment must never affect the validity or reliability of assessment, influence the outcome of assessment or give the learner(s) in question an unfair assessment advantage.

Examples of reasonable adjustments as defined by the above categories are listed below.

- Allowing extra time, e.g. assignment extensions
- Using a different assessment location
- Use of coloured overlays, low vision aids, CCTV
- Use of assistive software
- Assessment material in large format or Braille
- Readers/scribes
- Practical assistants/transcribers/promoters
- Assessment material on coloured paper or in audio format
- Language-modified assessment material
- British Sign Language (BSL)
- Use of ICT/responses using electronic devices

Applying reasonable adjustment

Reasonable adjustments are approved by the Quality Team before an assessment and are intended to allow attainment to be demonstrated. A learner does not have to be disabled (as defined by the DDA) to qualify for reasonable adjustment; nor will every learner who is disabled be entitled to reasonable adjustment. Allowing reasonable adjustment is dependent upon how it will facilitate access for the learner. A reasonable adjustment is intended to allow access to assessment but can only be granted where the adjustment does not:

- affect the validity or reliability of the assessment
- give the learner(s) in question an unfair advantage over other learners taking the same or similar assessment
- influence the final outcome of the assessment decision.

Special consideration

Special considerations are different to reasonable adjustments as they apply to a disadvantage that occurs to the learner either just before or during the assessment. Reasons for special consideration could be:

- Temporary illness
- Injury
- Adverse circumstances at the time of the assessment.
- A learner may be eligible for special consideration if:

Their performance in an external assessment is affected by circumstances beyond the control of the learner, e.g. recent personal illness, accident, bereavement, serious disturbance during the assessment

- The alternative assessment arrangements which were agreed in advance of the assessment proved inappropriate or inadequate
- Any part of an assessment has been missed due to circumstances beyond the control of the learner.

All applications for special consideration can only be made on a case-by-case basis and thus separate applications must be made for each learner. Learners may apply for special consideration during or after an assessment but may not apply for special consideration in the case of a permanent disability or learning difficulty. The size of the adjustment will depend on the circumstances during the assessment and will reflect the difficulty faced by the learner.

RECOGNITION OF PRIOR LEARNING (RPL)

Definition

A method of assessment [leading to the award of credit] that considers whether a learner can demonstrate that they meet the assessment requirements for a unit through knowledge, understanding or skills they already possess and do not need to develop a course of learning `

Introduction

Seeks to enable learners to avoid the duplication of learning and assessment. There are two ways in which this will be achieved:

- The opportunity to transfer credits, i.e. to recognise previously accredited achievement from within or outside the Qualification and Credit Framework (QCF) to count towards other qualifications.
- For individuals with leaning or achievements that have not been certificated/accredited it may be possible to assess and validate these through RPL process. These achievements may then count towards a qualification.

Policy

In order to achieve the above, a learner must produce valid and reliable evidence of learning to support any claims based on experience. A learner may claim RPL against a whole unit or several units. It is not possible to award part units, but where the RPL evidence does not fully meet the needs of a complete unit, the missing information may be provided via the same assessment processes that are undertaken by a taught group of learners.

In order to achieve recognition of achievement there are two options open to the learner:

- Undertake the same assessments as those following the formal course of learning and assessment that lead to the desired unit or qualification. These assessments may be undertaken without attending the teaching sessions.
- Submit a portfolio of evidence based on previous learning, skills and / or competence cross referenced to the learning outcomes and assessment criteria of the unit or units for which RPL is being sought.

Under some circumstances there may be a limit to the proportion of a qualification that can be achieved by either credit transfer or RPL. For example within Access to HE Diplomas, not more than 50% (i.e. 30 credits) may be achieved by either or both of these processes.

Learners wishing to avail themselves of this method of accreditation must negotiate the procedure with the organisation through which they wish to claim the award of credit.

The learner must play an active role in the process as s/he must produce evidence and map it to the learning outcomes and assessment criteria of all units they wish to claim. Appropriately trained staff from the learning provider organisation concerned should be available to give specialist advice on this process. The individual wishing to make the claim may also require the support of their employer or other organisation (e.g. if they have worked as an unpaid volunteer) in order to be able to confirm achievement of assessment criteria for which there is no tangible evidence, e.g. practical tasks.

Principles of RPL:

RPL is a valid method of enabling individuals to claim credit for units and qualifications of the QCF, irrespective of how the learning took place and the assessments undertaken. There is no difference between the achievement of the required standards through prior learning and through a formal programme of study.

RPL must comply with all regulatory requirements for assessment. RPL policies, processes, procedures, practices and decisions should be transparent, rigorous, reliable, fair and accessible to individuals and stakeholders to ensure that users can be confident of the decisions and outcomes of RPL.

RPL is a learner-centred voluntary process. The individual should be offered advice on the nature and range of evidence considered appropriate to support a claim for assessing RPL, and be given guidance and support to make his or her claim.

The process of RPL is subject to the same standard of quality assurance and monitoring processes as any other form of learning and assessment.

Assessment methods for RPL must be of equal rigour as other assessment methods, must be fit for purpose and relate to the evidence of learning. An individual may claim RPL for any whole unit unless the assessment criteria of a unit states otherwise. For example if an external assessment sets the standard of learning outcome that a learner must achieve, then the learner must pass the external assessment to achieve the unit and gain the credit.

Guidance for implementation

Stage 1: Awareness raising regarding claiming of credit – information, advice and guidance.

Once learners have decided to consider their learning for RPL purposes, they will need to know about:

- How to claim credit via the RPL process
- Sources of professional support and guidance available to individuals and employers
- The administrative process for RPL applications
- Timelines, appeals processes, and any fees or subsidies
- The currency of existing evidence, qualification, experience, skills or competence. (i.e. Does the evidence relate to current learning? Where centres and / or professional, statutory or regulatory bodies have specific requirements and / or time limits for the currency of evidence, certification, or demonstration of learning, these should be made clear and transparent)

Stage 2: Pre-assessment – gathering evidence and giving information.

When an individual has decided to pursue an RPL route towards achievement it is vital that the candidate is fully informed of the RPL process and has sufficient support to make a viable claim and to make decisions about evidence collection and presentation for assessment.

During this stage the candidate will carry out the evidence collection and develop an assessment plan. The evidence required for the award of credit

will depend on the purpose, learning outcomes and assessment criteria for the relevant unit within the QCF.

Stage 3: Assessment / documentation of evidence.

Assessment as part of RPL and within the QCF is a structured process for gathering and reviewing evidence and making judgements about a candidate's prior learning and experience in relation to unit standards.

Assessment must be valid and reliable to ensure the integrity of units and qualifications and the RPL system as a whole. The assessment process for RPL must be subject to the same quality assurance processes as any other of the assessment process. Learners' work which contributes towards their claim for credit via the RPL process should be internally and externally verified and all achievement documented as for conventional learner achievement, all RPL – related achievement should be marked as such in all documentation.

Stage 4: Awarding credit.

Awarding organisations are responsible for awarding credit. The procedure is the same as for other forms of assessment. The credit is recorded in the learner record.

Stage 5: Feedback

After the assessment the assessor will need to give feedback to the candidate, discussing the results and giving support and guidance on the options available to the candidate, which may include, for example, further learning and development.

Stage 6: Appeal.

6.7.1 If claimants wish to appeal against a decision made about their claim for credit (via the RPL process) they would need to follow the standard appeals process.

REGISTRATION POLICY

Eventcover Education works with a number of partner Colleges and a wide range of Awarding Bodies. Some qualifications and some institutions demand specific information before learners can commence their courses therefore the registration process may vary. All learners need to be aware of the following requirements prior to the commencement of all of our courses;

1. Learners are required to fill in the Eventcover or partner College registration form.
2. Prior to learning commencing proof of identity is required by all learners. Acceptable forms of identification are; Passport, Driving License, Birth Certificate, Employers identification, Bank Statement.
3. Eventcover Education adheres to the Data Protection Act and is registered with the 'Information Commissioners Office Data Protection'. Learners need to be aware their personal information is shared with the Government body 'The Skills Funding Agency'.

Any learner who has any issues or feels the need to complain about the registration process is able to follow the Complaints Procedure outline towards the end of each course handbook.

RISK ASSESSMENT POLICY

Purpose

To enable Eventcover to perform regular Risk Assessment for the purpose of determining areas of concern in identifying hazards and resulting risks.

Scope

Risk Assessments can be conducted at any event or venue where Eventcover provides a service.

Policy

The execution, development and implementation of all risk assessment activity is the responsibility of Eventcover and the management responsible for the areas being assessed. Employees are expected to cooperate fully with the Risk Assessment conducted in the place of work for which they are responsible. Eventcover employees are expected to work closely with management in the ongoing development of Risk Assessment.

Process

Risk Assessments will be carried out in an on-going progressive basis, all staff will participate in the process, with management acknowledgement of the contribution of staff in assessing risks.

Enforcement

Any employee found to have violated this policy may be subject to disciplinary action including termination of employment.

SAFEGUARDING POLICY

We will ensure that all Eventcover's employees, and those who undertake work on our behalf, maintain a proper focus on safeguarding children and young people and that this is reflected both in sound individual practice and our internal policies and guidance. All permanent and contracted staff working with children and young people must:

- give highest priority to children's welfare
- recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people
- respond appropriately to disclosure by a child, or young person, of abuse
- respond appropriately to allegations against staff, other adults, and against themselves
- act appropriately during inspection and understand safe practice in carrying out their duties
- be alert to the risks which abusers, or potential abusers, may pose
- be aware of the importance of the role of inspected services in promoting the welfare of children and
- contribute as necessary to all stages of Eventcover's safeguarding and protection processes.

Eventcover will ensure that it fulfils its responsibilities to work jointly with others to safeguard and promote the welfare of children and young people and, where necessary, to help bring to justice the perpetrators of crimes against children.

Eventcover ensures recruitment follows best practise in Safeguarding:

- The job description and person specification – clearly define the role, the tasks and skills needed and the type of person most suited to the post. Eventcover will always consider whether an Enhanced Disclosure check may be appropriate for the post.
- All potential paid staff should complete an application form. The applicant can be particularly asked about any relevant experience of working with children/vulnerable adults. A copy of our Safeguarding Policy will be included in the application pack.
- Declaration included in the application pack;

I declare that I have no past convictions, cautions or bind-overs and no pending cases affecting why I might be considered unsuitable to work with children/vulnerable adults nor am I barred from working in regulated activity.

Signed..... Date.....

You are also required to reveal details of all spent and unspent convictions under the provisions of the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975.

A Criminal Records Bureau Enhanced Disclosure will be requested should you be offered the position. If called for interview, we encourage all applicants to provide details of their criminal record as part of the recruitment process. This information should be sent under separate, confidential cover. Having a

criminal record will not necessarily bar you from working with us. This will depend on the nature of the position and the circumstances and background of your offences. This information will be treated in the strictest confidence, and is purely for the purpose of protecting children/vulnerable adults with whom we work, and will not be used unfairly. The Association complies with the CRB Code of Practice, a copy of which is available from the office on request.

- 2 written references will be required from applicants and specifically ask referees about the suitability of the applicant for working with children or vulnerable adults. Where possible these will be taken up before the interview and will be verified by a follow-up phone call.
- Photo ID is required from the applicant (such as a passport or driving licence) to verify the person's identity.
- Applicants must have full employment/volunteering history on their application form, explanations will be required for any gaps in employment.
- All staff who are involved in the recruitment process will receive appropriate guidance and training in the relevant legislation including the Rehabilitation of Offenders Act 1974.

STAFF INDUCTION PROGRAMME FOR BUSINESS SUPPORT

Welcome to the Eventcover Education Ltd Induction booklet. This is designed to guide you through the induction sessions that will best help you to settle in and establish yourself in the Company.

It will do this in two ways:

1. It will help you to understand how the company operates by giving sufficient orientation material, (which is in a check list format) to ensure that all the important areas you need to know are covered. Your manager and/or mentor will help you do this.
2. It will help you understand how the Company works in practice. The training programme over the page is designed to ensure that you have every opportunity to perform as well as you can.

- **Local Induction.**

This is a record of areas you and your line manager should discuss about working in your section of the Company. This should be brought to you by your line manager within a fortnight of your commencing work.

- **Job Specific Induction.**

After you have attended the All Staff Induction you will be invited to induction sessions that are tailored to your general job type. Further details are shown on page four.

Please note that this is a working document as well as a record of completed elements of induction. Please use the comments column to note planned activities and associated information.

If you wish to query any aspect of the training programme, please speak with your manager or a colleague.

Job Specific Induction

The programme is then tailored according to your general job category. These are:

- Directors
- Managers
- Assessors/trainers/internal verifiers
- Business Support

These inductions cover the following basic information.

Strategic Overview of the Company

(all staff induction)

Health and Safety and Associated Support

(all staff induction)

The Disability Discrimination Act (DDA)

(all staff induction)

Business Support Induction

(job specific)

The Induction programme for Business Support Staff has been established to ensure that all new staff receive the necessary training and support to enable them to support others. The main elements to the programme are indicated below.

- *Administration Skills*
- *Company Management Information Systems*
- *Management Information Systems training are provided to ensure that new staff can access the information they need to operate effectively in their posts.*
- *Training Day*
- *Eventcover Education Ltd*
- *Induction Programme for Business Support*

Section 2: IT Skills

Please review the following IT applications and comment on your present level of competence and your perceived training needs. Please discuss this with your manager and, if necessary, draw up an action plan for areas which need further development.

Word

Excel

PowerPoint

Outlook

Internet Explorer

STAFF VETTING PROCEDURE

All new staff are required to produce their photographic driving licence and passport. This is used to carry out an enhanced DBS check which is carried out by Eventcover Education's Data Controller.

Dates of birth and National Insurance numbers are checked with the Inland Revenue prior to any payment being made to ensure staff have the right to work in this country. This is carried out by our accountants Harrison Hutchinson of Whitley Bay.

These checks are made prior to any work taking place by new staff members.

SUSTAINABILITY POLICY

Eventcover Education has detailed contingency plans and structures in place to counteract any negative behaviour that may cause issues with the company sustainability or how it is controlled. All arrangements have been maintained throughout the company life, with regular reviews and have been analysed and developed to meet needs and requirements of the industry and fellow partners to counteract negative behaviours.

Official Company Location.

The office is currently located in Peterlee in Novus Business Centre. The Office is protected with alarms, security gates, cameras and fire equipment. Should these not be effective the building management have an associated business centre at Seaham and we also have a company training facility in Newcastle upon Tyne as well as our sister company's office, Eventcover Productions in Newcastle upon Tyne and the Cluny, which we use for training purposes.

IT Systems and Data.

All computers are password protected and stored in a secure environment. All data can be accessed via a remote system should the computers be affected by any incident. The company has an IT professional Gareth Briggs who manages the online system and records all data and guarantees all information is backed up and stored in a secure location.

Staff and Company Structure.

The company structure is set in a way that should a role need replacing and/or substituting for any reason we have staff trained in all aspects of company roles to continue with support until required roles are covered adequately. All training for such instances is purposeful. This will cover management and support roles in the event of sickness, leave or death.

Training Facilities.

As the office listed above, the training centre also falls under the protection of alarms, CCTV and physical security systems. Should this fail at any time we have adequate training facilities throughout the region including facilities at The Cluny in Newcastle upon Tyne, in addition to accommodation available at our Office base in Peterlee and also if required at Eventcover Productions head office.

Finance.

The company holds at least three months expenditure in their current account to provide essential financial support to the business' services if required.

Learner Contingency Issues.

Eventcover Education have procedures in place to ensure the continued learning opportunities for registered candidates should unforeseen issues arise.

In the event of an Awarding Body withdrawing our capacity to deliver a qualification, or our insolvency, Heart of Worcestershire College our contractor would take over the delivery of teaching and learning. All candidates are registered as their learners.

In the event of Heart of Worcestershire College withdrawing funding we would ensure all learners concluded their courses.

In the event of Heart of Worcestershire College losing accreditation the West Midlands Combined Authority would arrange an alternative partnership to ensure their learners are not disadvantaged.

TEACHING AND LEARNING STRATEGY

Effective Learning and Teaching are vital to a high quality learner experience and are critical to learner success. The quality of the learner experience is directly linked to learners remaining on programme and achieving their qualifications.

The Teaching and Learning Strategy must focus on enhancing the individual learner's knowledge and skills that are critical for employment. It must also enable the learner to access their chosen career in the Cultural Sector.

The Teaching and Learning Strategy follows these key principles:

- High quality learning and teaching focused on meeting individual needs and encouraging aspiration and achievement in all learners.
- Training is innovative, flexible, linked to vocational practice, up to date, and clearly links to employment opportunities and occupational relevance.
- Functional Skills embedded in all learning.
- High quality resources and facilities to support learning, teaching and assessment.
- Programmes of learning are directly informed by partners such as the Job Centre Plus and employers which ensure that training is relevant to the employment market as well as the needs of the learners.

- Learning journey supported by robust IAG which is embedded into the learning experience. This ensures learners achieve qualifications relevant to their abilities and consistent with their learning goals.
- To focus on improving the consistency of high quality teaching to meet learners needs as effectively as possible.
- Assessment and feedback is individually tailored to the learner. The role of assessment is to move learning forward by establishing where each learner is in their learning, clarifying what the next learning goal is and then help the learner achieve that goal.
- Eventcover is committed to continuous professional development of staff all staff experience meaningful industry experience during the year to maintain sector competence.
- The development of employability skills in any learning and teaching must be a core thread that is evident throughout.
- Promotion of equal opportunities, diversity and inclusion

WHISTLEBLOWING POLICY

The aim of this Policy is to encourage employees and others who have serious concerns about any aspect of the Eventcover Education's work to come forward and voice those concerns.

Employees are often the first to realise that there may be something seriously wrong within the Eventcover Education. 'Whistleblowing' is viewed by the Eventcover Education as a positive act that can make a valuable contribution to the Eventcover Education's efficiency and long-term success..

If you are considering raising a concern you should read this Policy first. It explains:

- the type of issues that can be raised
- how the person raising a concern will be protected from victimisation and harassment
- how to raise a concern, and
- what the Eventcover Education will do.

Aims of the Policy

The Policy is designed to ensure that you can raise your concerns about wrongdoing or malpractice within the Eventcover Education without fear of victimisation, subsequent discrimination, disadvantage or dismissal.

It is also intended to encourage and enable you to raise serious concerns within the Eventcover Education rather than ignoring a problem or 'blowing the whistle' outside.

This Policy aims to:

- encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practice
- provide avenues for you to raise those concerns and receive feedback on any action taken
- ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied
- reassure you that you will be protected from possible reprisals or victimisation if you have made any disclosure in good faith.
- Scope of this Policy

This Policy is intended to enable those who become aware of wrongdoing by Eventcover Education affecting some other person or service, to report their concerns at the earliest opportunity so that they can be properly investigated.

The Whistleblowing Policy is not intended to replace existing procedures:

- if your concern relates to your own treatment as an employee, you should raise it under the existing grievance or harassment procedures
- if a client has a concern about services provided to him/her, it should be raised as a complaint to Eventcover Education

Who can raise a concern under this Policy?

The Policy applies to all:

- employees of Eventcover Education
- employees of suppliers

- voluntary workers working with Eventcover Education such as work experience students

What should be reported?

Any serious concerns that you have about service provision or the conduct of staff Eventcover Education or others acting on behalf of the Eventcover Education that:

- make you feel uncomfortable in terms of known standards
- are not in keeping with Eventcover Education's policies
- fall below established standards of practice; or
- are improper behaviour.

These might relate to:

- conduct which is an offence or a breach of the law (a criminal offence has been committed or failing to comply with any other legal obligation)
- disclosures related to miscarriages of justice
- racial, sexual, disability or other discrimination
- health and safety of the public and/or other employees
- damage to the environment
- unauthorised use of funds or other assets
- possible fraud and corruption
- neglect or abuse of clients, or

- other unethical conduct.

This list is not exhaustive.

Your legal rights

It is unlawful for Eventcover Education to dismiss anyone or allow them to be victimised on the basis that they have made an appropriate lawful disclosure.

Rarely, a case might arise where it is the employee that has participated in the action causing concern. In such a case it is in the employee's interest to come into the open as soon as possible. Eventcover Education cannot promise not to act against such an employee, but the fact that they came forward may be taken into account.

Harassment or victimisation

Eventcover Education is committed to good practice and high standards and to being supportive of you as an employee.

Eventcover Education recognises that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer, your colleagues and those for whom you are providing a service.

Eventcover Education will not tolerate any harassment or victimisation of a whistleblower (including informal pressures) and will take appropriate action to protect you when you raise a concern in good faith and will treat this as a serious disciplinary offence which will be dealt with under the disciplinary rules and procedure.

Support to you

Throughout this process:

- you will be given full support from Senior Management
- your concerns will be taken seriously; and
- Eventcover Education will do all it can to help you throughout the investigation.

If appropriate, the Eventcover Education will consider temporarily re-deploying you for the period of the investigation.

For those who are not Eventcover Education employees, Eventcover Education will endeavour to provide appropriate advice and support wherever possible.

Confidentiality

All concerns will be treated in confidence and every effort will be made not to reveal your identity if that is your wish. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your help, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

Anonymous allegations

This Policy encourages you to put your name to your allegation whenever possible. If you do not tell us who you are it will be much more difficult for us to protect your position or to give you feedback. This Policy is not ideally suited to concerns raised anonymously.

Concerns expressed anonymously are much less powerful but they may be considered at the discretion of Eventcover Education. In exercising this discretion the factors to be taken into account would include:

- the seriousness of the issue raised
- the credibility of the concern; and
- the likelihood of confirming the allegation from other sources.

Untrue allegations

If you make an allegation in good faith and reasonably believing it to be true, but it is not confirmed by the investigation, Eventcover Education will recognise your concern and you have nothing to fear. If however, you make an allegation frivolously, maliciously or for personal gain, appropriate action that could include disciplinary action, may be taken.

Who should you raise your concern with?

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of the wrongdoing. You should normally raise concerns with:

- Your Line Manager
- Any of the four directors at Eventcover Education

How to raise a concern

You may raise your concern by telephone, in person or in writing. The earlier you express your concern, the easier it is to take action. You will need to provide the following information:

- the nature of your concern and why you believe it to be true
- the background and history of the concern (giving relevant dates).

Although you are not expected to prove beyond doubt the truth of your suspicion, you will need to demonstrate to the person contacted that you are acting in good faith and there are reasonable grounds for your concern.

You may wish to consider discussing your concern with a colleague first and you may find it easier to raise the matter if there are two (or more) of you who have had the same experience or concerns.

You may invite your trade union, professional association representative or a friend to be present for support during any meetings or interviews in connection with the concerns you have raised.

Eventcover Education will respond to your concerns as quickly as possible.

In order to be fair to all employees, including those who may be wrongly or mistakenly accused, initial enquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until (or if) it becomes necessary to do so. In certain cases however, such as allegations of ill treatment of others, suspension from work may have to be considered immediately. Protection of others is paramount in all cases.

Where appropriate, the matters raised may:

- be investigated by management, internal audit, or through the disciplinary/grievance process
- be referred to the police

- be referred and put through established child protection/abuse procedures

Within ten working days of a concern being raised, the person investigating your concern will write to you:

- acknowledging that the concern has been received
- indicating how Eventcover Education proposes to deal with the matter
- supplying you with information on staff support mechanisms
- telling you whether further investigations will take place and if not, why not.

The amount of contact between you and the officers considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of your information. It is likely that you will be interviewed to ensure that your disclosure is fully understood.

Any meeting can be arranged away from your workplace, if you wish, and a union or professional association representative or a friend may accompany you in support.

Eventcover Education will do what it can to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are asked to give evidence in criminal or disciplinary proceedings, Eventcover Education will arrange for you to receive appropriate advice and support.

You need to be assured that your disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, you will be kept informed of the progress and outcome of any investigation.

This Policy is intended to provide you with an avenue within Eventcover Education to raise concerns. Eventcover Education hopes you will be satisfied with any action taken.

HEALTH AND SAFETY POLICY

attached – next page