

# ELA TRAINING SERVICES

## Safeguarding Policy 2023-24



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## Key Elements

- This document sets out the responsibilities and expectations for all employees of ELA Training Services in relation to and promoting the health, safety, wellbeing, ethical and professional conduct and safeguarding of all stakeholders of ELA Training Services. Implementation is monitored by the Managing Director and supported by the board of Directors.
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**Agreed by: Ali Khan, Managing Director,  
ELA Training Services.**



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# SAFEGUARDING



ELA defines Safeguarding as including **vulnerable person protection**, our **Prevent Duty**, and **Data Protection**. **E-Safety** is a principle that underpins all elements of safeguarding.



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# Meet ELA's Wellbeing Team

Your Trainer, Assessor or Portfolio Coach

Each member of ELA's learning delivery and support team is trained and duty-bound to report all disclosures within 1 hour of receiving them. If you do not feel safe or are worried about yourself, someone else or something, you must speak to someone that you trust. Our team are here to help. Please contact your trainer, assessor, portfolio coach, any one of the people below or simply email [safe@ela-training.co.uk](mailto:safe@ela-training.co.uk) with your concern.



**Ali Khan**

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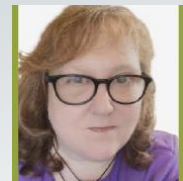
Designated Safeguarding Lead (DSL) and has responsibility for implementing the ELA Training Services Safeguarding Policy and for reporting any allegations of abuse and concerns that occur to the relevant authorities. The role of Designated Safeguarding Lead currently includes the responsibilities of Prevent Lead and Data Protection Lead. Ali holds a Level 3 Certificate in Safeguarding and Level 2 in Mental Health First Aid.



**Sandra Chatwood**

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Designated Deputy Safeguarding Lead (DDSL) responsible for recording and reporting any allegations of abuse and concerns that occur to the relevant authorities (deputizing in the absence of the DSL)



**Wendy Johnson**

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Wendy is one of our Functional Skills Specialists, and is qualified as an Advanced Designated Safeguarding Lead at Level 4



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## Directors' statement of commitment to an unbiased, non-partisan, non-discriminatory and ethical workplace.

- The Directors of the ELA Training Services wish to make it clear that the propagation of extremist religious views, partisan political views and discriminatory practices by employees and stakeholders will not be tolerated.
- All employees are expected to offer a balanced presentation of views and opinions to learners while carrying out their duties and taking part in extra-curricular activities that are provided or organised by or on behalf of the ELA Training Services, including through the distribution of promotional materials. Extremist religious views, partisan political views and discriminatory practices by employees and stakeholders MUST be reported and dealt with robustly.
- We take our commitment to providing an unbiased, non-partisan, non-discriminatory and ethical workplace seriously. Failure to observe the above could lead to disciplinary action (including summary dismissal) and referral to government, regulatory organisations and education authorities.
- ELA Training Services is committed to protecting the health, safety and welfare of our stakeholders. It is our policy to ensure, as far as is reasonably practicable, that all required tasks and activities are carried out with the minimum of risk to all of our stakeholders.
- Taking advice from policies like Care Act (2014) and Keeping Children safe in Education (Sept 2021). We have including all relevant policies into our Safeguarding procedures to make this document as comprehensive as possible.

## Introduction

- We define stakeholders as everyone who is, or is perceived to be affected by the operations of ELA Training Services. This especially includes and is not restricted to employees, vulnerable and young people with whom our work brings us into contact.

We define vulnerable people as people who are or may be for any reason unable to take care of themselves, or unable to protect themselves against significant harm or exploitation. We make it clear that although most of the procedures and guidelines are designed to be used by ELA Training Services staff to safeguard ELA Training Services learners, the procedures and guidelines are also intended to be used with reasonable discretion by stakeholders to protect other stakeholders.



- In the context of child protection, children and young people refers to anyone under 18 years of age. It is the responsibility of everyone at ELA Training Services to promote the protection of all stakeholders, especially vulnerable and young people.
- We define Safeguarding as the action we take to promote the welfare of stakeholders and protect them from harm. It means caring for learners appropriately and protecting them from that which is not in their best interests. It includes the health and safety, protection and pastoral care of young and vulnerable people. Connected to safeguarding is the phrase 'Duty of Care'; there is a legal responsibility that all employees who work with stakeholders have a duty to look after them properly; young and vulnerable people especially depend on adults for their safety and well-being.
- ELA Training Services acknowledges the duty of care to safeguard and promote the welfare of young people and vulnerable adults is committed to ensuring that our safeguarding practice reflects our statutory responsibilities and government guidance, and complies with best practice and regulatory requirements. This policy recognises that the welfare and interests of young people and vulnerable adults are paramount in all circumstances.
- It aims to ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or socio-economic background, all people are equally regarded, and their right to protection from harm or abuse is consistently upheld.
- ELA Training Services is committed to safeguarding the welfare of ELA Training Services stakeholders and has developed this Safeguarding Protection Policy and Procedure to support all stakeholders in putting into practice this commitment.
- This policy establishes the roles and responsibilities of everyone who works for ELA Training Services in relation to the protection of all stakeholders, especially vulnerable people with whom their work brings them into contact.
- In following this policy, staff are always expected to maintain a sense of proportion, apply common sense to situations and protect the subject's welfare as priority. This policy is based on, and reflects, the principles of both UK legislation and guidance and other relevant ELA Training Services policies and procedures. The approach has been developed in such a way as to be consistent with 'Best Practice' within the field of safeguarding.



- It is also the duty of ELA Training Services to ensure that persons are not placed in situations where abuse might be alleged. It is not intended that the policy should restrict staff from normal ways of working, but colleagues always need to consider how an action or activity may be perceived as opposed to how it is intended.

## Additional Responsibilities

The Directors of ELA Training Services will ensure the promotion, commitment to, and the training of it's employees in implementing the Safeguarding policy.

An 'ELA Wellbeing Team' has been appointed with a Designated Safeguarding Lead and 2 Deputy Safeguarding Leads. All 3 members of the team have completed Designated Safeguarding Lead training.

A 'Safeguarding Working Group' has been appointed and meets monthly, this group consists of the ELA Wellbeing Team, the organisation's People and Culture Manager, and a Safeguarding representative from each of the delivery teams. (Early Years, Health & Social Care and Business Portfolio).

The role of the Working Group is to help ensure that a culture and awareness of Safeguarding is embedded right across the business from recruitment and induction of staff, through to the delivery and pastoral support of Apprentices in all delivery teams. It also ensures that new resources, best practice, changes in procedures and legislative updates can be distributed effectively as members can share these in their own team meetings. The group also reviews previous and current safeguarding issues to discuss lessons learned and best practice.

Posters displaying ELA's Wellbeing Team (and how to report a safeguarding issue) have been distributed widely across the business, with as much external exposure to relevant external stakeholders as possible. They have been added to PowerPoint slides for all apprentice inductions and teaching resources to ensure awareness of the Designated Safeguarding Leads and Deputy Leads. How to report a safeguarding concern has been added to all email signatures and branded virtual meeting backgrounds.

All staff complete mandatory Safeguarding training on joining the organisation as part of their induction, with regular updates in team and standardisation meetings. The Head of People and Culture also sends out awareness raising communications and training activities on a regular basis to further promote the culture of safeguarding, embed good safeguarding practices and raise awareness across the organisation.





Safeguarding notices are added to ePortfolio noticeboards, to improve learner and employer engagement and accessibility to the latest information. Safeguarding resources have also been added to ePortfolio in the form of Teaching, Learning and Assessment Plans which learners must complete as part of their Apprenticeship journey. This helps refresh their knowledge of the subject and ensures they are aware of ELA’s approach and reporting protocols.

**ELA Training Services promote well-being by applying principles of good practice by undertaking to:**

- Treat stakeholders with care, respect and dignity
- Recognise that those working for ELA Training Services will be perceived by stakeholders and young people as trusted representatives of ELA Training Services
- Ensure communication with stakeholders is open and clear Assess the risks to stakeholders of its activities

**ELA Training Services will fulfil our local and national responsibilities as laid out in the following documents:**

- The Procedures of the Borough of Hounslow’s Safeguarding Boards(Jan 2018)
- Keeping Children Safe in Education: Statutory guidance for schools and colleges (DfE Sept 2020 and from Sept 2021)
- The Data Protection Act (2018)
- The General Data Protection Regulation (GDPR) (Regulation (EU) 2018)
- The Care Act (2014)
- The Prevent Duty (March 2016) as part of the Counter-Terrorism and Security Act (2015)
- Working Together to Safeguard Children (DfE 2015)
- Mental Health and Behaviour in Schools: Departmental Advice (DfE 2014)
- The Education Act 2002 s175 / s157



## Application of this Policy

- This policy and procedures are widely promoted and are mandatory for everyone involved in ELA Training Services: for ELA Training Services staff and trainers/assessors and stakeholders.
- ELA Training Services is committed to safeguarding the welfare of every young person and vulnerable adult in its care and all adults associated with our organisation will be expected to share our ethos and actively engage in looking after vulnerable and young people safely.
- The ELA Training Services Safeguarding Policy and Guidance is known to all trainers/assessors.

Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

## Policy Aims

- To provide protection for the stakeholders and young people who receive ELA Training Services' services, including the stakeholders of our trainers/assessors via the learner code of conduct.
- To provide ELA Training Services staff, trainers/assessors and their families with guidance on procedures they should adopt in the event that they suspect a vulnerable person may be experiencing or be at risk of harm.

## ELA Training Services Safeguarding Principles

We will seek to safeguard stakeholders and learners by:

- Valuing, listening to and respecting them; adopting safeguarding guidelines through procedures and a code of conduct for staff, trainers/assessors and stakeholder; promoting and prioritising the safety and wellbeing of stakeholders, young and/or vulnerable people.
- Recruiting staff and trainers/assessors safely, ensuring all necessary checks are made, preventing the employment/deployment of unsuitable individuals.
- Sharing information about safeguarding and good practice with ELA Training Services Guardianship stakeholders, employers, staff, trainers/assessors and their families.



- Sharing information about concerns with agencies who need to know, and involving employers and stakeholders appropriately; providing effective management for ELA Training Services staff, trainers, and assessors through supervision, support and training; providing a safe and secure environment for all stakeholders; ensuring all stakeholders are safe and secure and protected from harm; ensuring that all ELA Training Services Guardianship stakeholders know who to turn to for help, advice or support, **with access 24-hours per day.**
- Appointing a Designated Safeguarding Lead (DSL) who has overall responsibility for the safeguarding and welfare of all ELA Training Services Guardianship stakeholders.
- Ensuring that everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate training to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to stakeholders, young and/or vulnerable people.
- Ensuring that all staff and trainers/assessors follow ELA Training Services policies and procedures relating to safeguarding and welfare and are aware of who in ELA Training Services is responsible for safeguarding.
- Ensuring that the relevant persons are aware of the special needs or particular vulnerabilities of individual ELA Training Services stakeholders.
- Ensuring appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern.
- Ensuring that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.

### **ELA Training Services staff roles and responsibilities:**

- At ELA Training Services safeguarding is everyone's responsibility. Within ELA Training Services, the Directors oversee the day-to-day welfare and safeguarding matters, placement of ELA Training Services learners with assessors/trainers, induction and recording systems.
- Ali Khan (Director) is the Designated Safeguarding Lead (DSL) and has responsibility for implementing the ELA Training Services Safeguarding Policy. Ali Khan is trained to Level 3 in Safeguarding. The (DSL) is responsible for reporting any allegations of abuse and concerns that occur to the relevant authorities. The role of Designated



Safeguarding Lead currently includes the responsibilities of Prevent Lead and Data Protection Lead. The role is supported by administrators that escalate, collect, process and report on important data.

### Implementing ELA Training Services' Safeguarding Policy:

- ELA Training Services considers it the duty of Trainers/assessors and Members of Staff to protect stakeholders, young and/or vulnerable people from abuse. This is the fundamental element of our safeguarding policy.
- All trainers/assessors and adults in the training environment must understand their responsibilities in being alert to the signs of abuse, and their responsibility for referring any concerns to the DSL.
- All trainers/assessors and adults in the training environment must understand the responsibility placed on ELA Training Services for vulnerable person protection.
- Not all concerns about stakeholders, young and/or vulnerable people relate to abuse, there may well be other explanations. It is important that all concerns are considered in the context of safeguarding.
- It is not a staff member's responsibility to investigate a concern. The responsibility is to act on concerns and take appropriate action according to company procedures.

### Confidentiality and Appropriate Disclosure of Information

- Records of Concern and Incident Reports must be used as detailed in their protocols. Confidentiality is crucial to all our relationships, but the welfare of the stakeholder, young and/or vulnerable person is paramount. Confidentiality cannot be maintained if the with holding of information will prejudice the welfare of the subject.
- All information that has been collected on any subject will be kept locked and secure and access will be strictly limited to the DSL. The DSL will be responsible for sharing information with the appropriate authorities.
- Following advice from organisations and professionals in the field of safeguarding, the DSL will make staff particularly aware of any current areas of concern.

### What to do if a person makes a disclosure



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- ELA Training Services is committed to ensuring that it meets its responsibilities in respect of safeguarding by treating any allegation seriously and sensitively. Records of Concern and Incident Reports must be used as detailed in their individual protocols.

**The Safeguarding Step Response to Disclosure Procedure for ELA Training Services staff is as follows:**

- Stay calm.
- Listen to what the stakeholder/young/vulnerable person is actually saying.
- Reassure them that they have done the right thing by disclosing.
- Do not promise total confidentiality, as subsequent disclosure could then lead to the stakeholder/young/vulnerable person feeling betrayed.
- Explain that you are obliged to inform the DSL who may need to involve other authorities.
- Reassure the subject that the people who will be informed will be sensitive to their needs and will be looking to help protect them. Inform them that it is not in their interests to keep the disclosure confidential, and it will have to be passed on to the appropriate agencies.
- Make a note of any conversations with the subject as soon as possible after the conversation has taken place, giving as much detail as possible, including when and where the conversations took place, and using the actual words used by the subject.
- Draw a diagram, if appropriate, to show the position of any bruises or marks the subject shows you, trying to indicate the size, shape and colour.
- Keep all records factual. Be aware of not making assumptions or interpretations of what the subject is telling you. Store all records securely.
- Do not interrogate the subject or push for more information. Ensure that any questions asked are open, not leading or closed questions.
- Discuss your concerns with the DSL who will report this information to an appropriate agency (the Designated Officer previously called the Local Authority Designated Officer-LADO).




- The person to whom the disclosure was made should ensure that the stakeholder/young and/or vulnerable person who has disclosed the information is informed about what will happen next, so they can be reassured about what to expect.
- You may report your concerns directly to your local Designated Officer if you are not satisfied with the response from ELA Training Services. You will find contact details for your local Social Care Referral and Assessment Team online. The details will be on your Local Council website.

**Allegations against under 18s**

- Due to the nature of ELA Training Services' business practice, some stakeholders, young and/or vulnerable may need additional support, as it is possible that their employers, guardians or parents will be overseas.

**ELA Training Services' Safer Recruitment and Induction Policy**

Adoption Date	Updated	Review Date	Director
10/2018	1/8/2022	1/8/2023	

**1. Safer Recruitment an Overview**

- ELA Training Services is committed to safeguarding and promoting the welfare of all learners in its care. As an employer, we expect all employees, contractors and volunteers to share this commitment.
- The aims of the Safer Recruitment policy is to help deter, reject or identify people who might abuse learners or are otherwise unsuited to working with them by having appropriate procedures for appointing staff.
- Recruitment is treated as a key public relations exercise as the manner in which it is managed affects ELA Training Services' image, and consequently its ability to attract and appoint high calibre staff.

- Our policy is designed to provide a framework which promotes good practice, adopts a proactive approach to equality and diversity issues and supports fully ELA Training Services' core business, whilst simultaneously complying with Safeguarding principles and current legislation.
- ELA Training Services recognises its staff as being fundamental to its success. A strategic and professional approach to our recruitment processes help enable ELA Training Services to attract and appoint staff with the necessary skills and attributes to fulfil its strategic aims, and support ELA Training Services' values.
- ELA Training Services is committed to ensuring that the recruitment and selection of staff is conducted in a manner that is systematic, efficient, effective and promotes principles of Safer Recruitment and equality of opportunity.

**The Safer Recruitment Policy at ELA is to ensure that:**

- The best possible staff are recruited based on merit, ability and suitability for the position.
- All job applicants are considered equally and consistently.
- No job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.
- There is compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education - September 2021), the Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service. (DBS)
- ELA meets its commitment to safeguarding and promoting the welfare of our learners by carrying out all necessary pre-employment checks.
- Employees involved in the recruitment and selection of staff are responsible for familiarising themselves with and complying with the provisions of this policy.
- ELA has a principle of open competition in its approach to recruitment and will seek to recruit the best applicant for the job.



- The recruitment and selection process should ensure the identification of the person best suited to the job at ELA, based on the applicant’s abilities, qualification, experience and merit as measured against the job description and person specification. The recruitment and selection of staff will be conducted in a professional, timely and responsive manner and in compliance with current employment legislation, and relevant safeguarding legislation and statutory guidance
- If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant, they must declare it as soon as they are aware of the individual’s application and avoid any involvement in the recruitment and selection decision-making process. ELA aims to operate this procedure consistently and thoroughly while obtaining, collating, analysing and evaluating information from and about applicants applying for job vacancies.
- Our overriding concern with our recruitment policies is to ensure that these are inextricably linked with our Safeguarding Policy and keeping our learners safe by going above and beyond where possible to ensure we recruit the right people.
- Robust checks on previous employment history, as well as obtaining character and work references will be carried out.
- ELA will keep and maintain a Single Central Record of all Safeguarding checks that have been carried out on all staff and other relevant people.
- All new employees will undergo DBS checks which will be reviewed every 1 years to ensure these records are up to date.

## 2. Roles and Responsibilities of the Board:

- It is the responsibility of the Board at ELA to:
- Ensure the company has effective policies and procedures in place for recruitment of all staff and volunteers in accordance with DfE guidance and legal requirements.
- Monitor ELA’S compliance with Safer Recruitment

## 3. Recruitment and Selection - Advertising

- To ensure equality of opportunity, ELA will advertise all vacant posts to encourage as wide a field of applicant as possible, normally this entails an external advertisement.





- Any advertisement will make clear the ELA commitment to safeguarding and promoting the welfare of its learners.
- All documentation relating to applicants will be treated confidentially in accordance with the Data Protection Act (DPA 2018). Application Forms: ELA uses its own application form and all applicants for employment will be required to complete an application form containing questions about their academic and employment history, supported by a CV. Any gaps in employment history will need to be explained.
- The application form will include the applicant's declaration regarding convictions and working with young people, and will make it clear that the post is exempt from the provisions of the Rehabilitation of Offenders Act 1974. CVs will be accepted.

#### **4. Interviews:**

- There will be a face-to-face interview wherever possible, and a minimum of two interviewers will see the applicants for the vacant position. The interview process will explore the applicant's ability to carry out the job description and meet the person specification. It will enable the panel to explore any anomalies or gaps which have been identified in order to satisfy themselves that the chosen applicant can meet the safeguarding criteria (in line with Safer Recruitment Training).
- Any information in regard to past disciplinary action or allegations, cautions or convictions will be discussed and considered in the circumstance of the individual case during the interview process, if it has been disclosed on the application form.
- At least one member of any interviewing panel will have undertaken safer recruitment training or refresher training as applicable.
- All applicants who are invited to an interview will be required to bring evidence of their identity and right to work in the UK. Typically, a passport. Original documents will only be accepted, and photocopies will be taken. Unsuccessful applicant documents will be destroyed 6 months after the recruitment programme.

#### **5. Offer of appointment and New Employee Process:**

- If it is decided to make an offer of employment following the formal interview, any such offer will be conditional based on the following: -
- Verification of the applicant's identity (if not previously verified)



- The receipt of two references (one of which must be from the applicant's most recent employer) which the ELA considers to be satisfactory for positions which involve "teaching work":
- That ELA is satisfied that the applicant is not, and has never been, the subject of a sanction, restriction or prohibition issued by the Teaching Regulation Agency (formerly National College for Teaching and Leadership), or any predecessor or successor body, or by a regulator of the teaching profession in any other European Economic Area country which prevents the applicant working at ELA.
- ELA is satisfied that the applicant is not, and has never been, the subject of any proceedings before a professional conduct panel or equivalent body in the UK or any other country, or any reason which prevents the applicant working at ELA or which, in the ELA'S opinion, renders the applicant unsuitable to work within the company.
- All preemployment checks are FULLY completed in line with ELA's Safer Recruitment Process Attached below.

### ELA SAFER RECRUITMENT PROCESS

1. Plan the recruitment process with Hiring Manager/ request Requisition Form/Is the post agreed in the structure?/Has the budget been approved?
2. Agree Selection methods / interview process /Job description with Hiring Manager/ include safer recruit questions in your recruitment design/use ELA agreed recruitment process only
3. Advertise the vacancy (request CV and completion of a short application form)
4. Scrutinise applications/ compile short List
5. Invite candidates to interview
6. Conduct Interview ( Before interview begins verify identify and right to work, using a passport etc. )
7. Send a conditional offer letter to successful candidate. Send a Health Questionnaire to include Covid Vaccination question Y/N - (NB: step 7, 8, 9 can be done at the same time.)
8. Request references x 2 for successful applicant using reference check software"
9. Carry out preemployment checks in full/ HR to fully complete Single Central Record (SCR) evidence in Excel/ add required documentse to BreatheHR to evidence busiiness compliance
10. Issue contract and confirm start date - only when ALL pre-employment and SCR checks are FULLY completed



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## 6. Contractors and agency staff:

- Contractors engaged by ELA must complete the same checks for their employees that ELA is required to complete for its staff. ELA requires confirmation that these checks have been completed before employees of the Contractor can commence work.
- Agencies who supply staff to the ELA must also complete the pre-employment checks which the ELA would otherwise complete for its staff. Again, the ELA requires confirmation that these checks have been completed before an individual can commence work.
- ELA will independently verify the identity of staff supplied by contractors or an agency, and will require the provision of the original DBS certificate before contractors or agency staff can commence work

## 7. Visiting speakers (and Prevent Duty):

- The Prevent Duty Guidance requires ELA to have clear protocols for ensuring that any visiting speakers, whether invited by staff or by learners, are suitable and appropriately supervised.
- ELA is not permitted to obtain a DBS disclosure or Children's Barred List information on any visiting speaker who does not engage in regulated activity or perform any other regular duties for or on behalf of the company.
- "'Extremism' is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas. Terrorist groups very often draw on extremist ideas developed by extremist organisations."
- In fulfilling its Prevent Duty obligations ELA does not discriminate on the grounds of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age.

## 8. Volunteers

- ELA will request an enhanced DBS disclosure and Children's Barred List information on all volunteers undertaking regulated activity with learners at or on behalf the company.



- Under no circumstances will ELA permit an unchecked volunteer to have unsupervised contact with learners.
- It is ELA policy that a new DBS certificate is required for volunteers who will engage in regulated activity.

## Induction Process:

### 1. General

- ELA Training Services believes that all new employees must be given timely induction training. This training is regarded as a vital part of staff recruitment and integration into the ELA Training Services' working environment.
- Our Policy associated procedures and guidelines define the Company's commitment to ensure that all staff are supported during the period of induction to the benefit of the employee and ELA Training Services alike.
- The impressions made when someone starts work for an organisation have a lasting impact on how they view their employer, so a welcoming and effective experience is key to making this first impression a positive one.
- Induction is the process through which employees adjust or acclimatise to their new jobs and working environment. As part of this, 'orientation' can be used for a specific event that new starters attend, and 'socialisation' can describe the way in which new employees build working relationships within their new teams. Some people use the term 'onboarding' to cover the whole process from an individual's contact with the organisation before they formally join, through to understanding the business' ways of working and getting up to speed in their role.
- Induction ensures that employees integrate well into and across the organisation. Research shows that induction programmes benefit both employers and employees. For employers, these include reducing turnover and absenteeism, and increasing employee commitment and job satisfaction. For employees, starting a new role in a new organisation can be an anxious time and an induction programme enables them to understand more about the organisation, their role, ways of working and to meet new colleagues.
- New recruits need to understand the organisation, the culture, the people, and what's expected of them in their role, so an effective programme will contain multiple, integrated elements.



## 2. Aim

- It is the aim of ELA Training Services to ensure that staff induction is dealt with in an organised consistent manner to enable staff to be introduced into a new position and working environment expediently, so that they can contribute effectively.

### **The implementation of good induction practices will :-**

- Enable new employees to settle into the Company and become a productive and efficient member of staff within a short period of time.
- Ensure that new entrants are highly motivated, and that this motivation is encouraged.
- Assist in reducing staff turnover, lateness, absenteeism and poor performance.
- Assist in developing a management style where emphasis is on leadership.
- Ensure that employees operate in a safe working environment.
- Will reduce costs associated with repeated recruitment, training, lost productiveness and time.
- Ensuring a consistent level of service.

### **ELA Training Services will:**

- Issue guidelines to familiarise staff with the induction process.
- Provide all line managers with an induction check list which must be fully completed and sent to HR
- Ensure all staff are issued with a full electronic Induction Pack of information
- Maintain and update our Induction Policies
- Ensure there is effective monitoring of the induction process particularly in the first three months.
- Deal with any problems promptly providing an efficient service for both Managers and Staff.



- Review all policy, procedure and guideline documents on a regular basis.
- Provide relevant formal training courses necessary to assist the induction process.

## Completing the Induction Process

### How long should induction last?

- This depends on each individual's need. For some staff, induction may be completed in a number of days. For others where the role is more complex or specific training requirements need to be addressed, induction may take several weeks.
- It is a matter of balancing being both efficient (completing induction as quickly as possible) and effective (giving staff the skills, knowledge, procedures, etc. they require to do their job).
- This also ensures that new employees are given the opportunity to contribute to the overall improvement and constant review of all our methods and practices.

### 3. Good Practice Induction


At ELA we believe that an induction should contain the following steps:

1. Meet and Greet
2. Introduction to the team
3. Organisational overview
4. Work policies and procedures
5. Role expectations
6. Processes to ensure compliance
7. Performance Standards
8. Review and feedback


Please see diagram below for a good practice induction process.





Adoption Date	Updated	Review Date	Director
10/2018	1/8/2022	1/8/2023	

**ELA Training Services' Whistleblowing Policy**

Adoption Date	Updated	Review Date	Director
10/2018	1/8/2022	1/8/2023	

• ELA Training Services are committed to conducting business with honesty and integrity, and we expect all employees to maintain high standards. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring or to address them when they do occur.

**The aims of this policy are:**

(a) To encourage Employee to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected. (b) To provide employees with guidance as to how to raise those concerns.

• To reassure employees that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

## What is whistleblowing?

**Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

- Criminal activity;
  - Miscarriages of justice;
  - Danger to health and safety;
  - Damage to the environment;
  - Failure to comply with any legal obligation or regulatory requirements;
  - Financial fraud or mismanagement;
  - Negligence;
  - Breach of our internal policies and procedures;
  - Conduct likely to damage our reputation;
  - Unauthorised disclosure of confidential information;
  - The deliberate concealment of any of the above matters.
- A **whistleblower** is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.
- This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure or Anti-harassment and Bullying Policy as appropriate.
- If you are uncertain whether something is within the scope of this policy you should seek advice from one of the persons named at paragraph 16.8 of this policy.





## Raising a whistleblowing concern

- We hope that in many cases you will be able to raise any concerns with your line manager. You may tell them in person or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases they may refer the matter to the Whistleblowing Officer.
- However, where the matter is more serious, or you feel that your line manager has not addressed your concern, or you prefer not to raise it with them for any reason, you should report the matter to the Whistleblowing Officer, Ali Khan – Managing Director and send an email to [ali@ela-training.co.uk](mailto:ali@ela-training.co.uk)
- We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or union representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

We will take down a written summary of your concern and provide you with a copy after the meeting. We will also aim to give you an indication of how we propose to deal with the matter.

## Confidentiality

- We hope that employees will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.
- We do not encourage employees to make disclosures anonymously. Proper investigation may be more difficult or impossible if we cannot obtain further information from you. It is also more difficult to establish whether any allegations are credible. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the Whistleblowing Officer and appropriate measures can then be taken to preserve confidentiality. If you are in any doubt you can seek advice from Public Concern at Work, the independent whistleblowing charity, who offer a confidential helpline.

## External disclosures

- The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.



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- The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. The independent whistleblowing charity, Public Concern at Work, operates a confidential helpline. They also have a list of prescribed regulators for reporting certain types of concern. Their contact details are at the end of this policy.
- Whistleblowing concerns usually relate to the conduct of our employees, but they may sometimes relate to the actions of a third party, such as a learner, client or supplier. The law allows you to raise a concern with a third party, where you reasonably believe it relates mainly to their actions or something that is legally their responsibility. However, we encourage you to report such concerns internally first.

## Investigation and outcome

- Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.
- In some cases we may appoint an investigator or team of investigators including employee with relevant experience of investigations or specialist knowledge of the subject matter.  
The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.
- We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- If we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower will be subject to disciplinary action.

## If you are not satisfied

- While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy you can help us to achieve this.



- If you are not happy with the way in which your concern has been handled, you can raise it with one of the other key contacts whose details are set out at the end of this policy.

## Protection and support for Whistleblowers

- It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support employee who raise genuine concerns under this policy, even if they turn out to be mistaken.
- Employees must not suffer any detrimental treatment as a result of raising a concern in good faith. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform one of the individuals named in this policy immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.
- Employees must not threaten or retaliate against whistleblowers in any way. Anyone involved in such conduct will be subject to disciplinary action.  
Responsibility for the success of this policy
- The Management has overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.
- The Management may delegate day-to-day operational responsibility for this policy to a Whistleblowing Officer. The Management will ensure that all managers and other employees who may deal with concerns or investigations under this policy receive appropriate training.
- This policy should be reviewed from a legal and operational perspective at least once a year.
- All employees are responsible for the success of this policy and should ensure that they use it to disclose any suspected danger or wrongdoing. Employees are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to your line manager.

## Fraud Prevention



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- ELA take an active role against potential fraud. The presence of a whistleblowing policy highlights the process that should be followed in order to ensure all business activities are ethical, genuine and in the public interest.
- Our IQA process, countersigning policies, internal audit function and the use of third party external auditors is designed to ensure learner claims are genuine and that all activity is valid.

## Key Contacts

Ali Khan (Whistleblowing Officer) Tel: 07832 328587  
Email: [ali@ela-training.co.uk](mailto:ali@ela-training.co.uk)

## Review

The effectiveness of this policy and associated arrangements will be reviewed annually under the direct supervision of the Director of Operations.

Adoption Date	Updated	Review date	Director
10/2018	1/8/2022	1/8/2023	

### ELA TRAINING SERVICES's Anti-Bullying Policy and Procedure

Adoption Date	Updated	Review date	Director
10/2018	1/8/2022	1/8/2023	

- ELA Training Services does not tolerate the bullying of other people in any form whatsoever and all incidents of bullying reported to ELA Training Services will be fully investigated.

## ELA Training Services learners and stakeholders are encouraged to:

- Respect other people, their space and their belongings
- Demonstrate kindness
- Not walk away if we see someone being bullied



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- Report incidents of bullying, including peer- to- peer bullying, and cyber bullying.

**ELA Training Services learners and stakeholders are given the following advice about bullying:**

- Talk to or contact someone you trust, such as your friend or if the subject is 16-18 years old, contact Childline on 08001111 or Samaritans on 116123 to talk to someone you don't know, safely.
- Be persistent. If the first person you talk to doesn't help, don't give up. Speak to someone else.
- If you can, write down everything that has been said or done to hurt you. Try to write down how you feel. When you have found someone you can trust, discuss what you have written.
- Ask the person you talk to not to do anything without telling you about it first. You have a right to know what is being done on your behalf and to say whether you think it is a good idea or not.
- Email ELA Training Services at [safe@ela-training.co.uk](mailto:safe@ela-training.co.uk)
- Most importantly, do something. Sometimes bullying stops quickly, but doing nothing means it may continue until someone is seriously upset or hurt.

**ELA TRAINING SERVICES' E-Safety Policy**

Adoption Date	Updated	Review Date	Director
10/2018	1/8/2022	1/8/2023	

**Purpose**

- This policy applies to all members of the ELA Training Services community (including

staff, employers/carers and visitors). It is a statement of the aims, principles, strategies and procedures for e-safety throughout ELA Training Services. The E-Safety Policy should be read in conjunction with our Data Protection and Information Sharing Policy and Safeguarding Policy.

- We have a responsibility to the learners in our care to know what they are doing online during their stay with us.

### What is E-Safety?

- E-Safety refers to safeguarding and safeguarding of both young people and adults in the digital world. It is about learning to understand and use technologies in a safe, positive way, also about supporting children and adults to develop safe online behaviours.

Risks to vulnerable people who use the internet include:

- Physical danger and sexual abuse, for example, through ‘grooming’
- Cyber bullying–persistent bullying through the digital medium
- Losing control over pictures and videos
- Obsessive use of the internet and ICT, for example, addiction to video games
- Damage to online reputation
- Inappropriate or illegal behaviour, for example, exposure to hate mail or offensive images
- Viruses, hacking and security
- Exposure to extremist material and the possibility of radicalisation
- Copyright infringement, for example, the illegal sharing of music, pictures, video or documents
- E-Safety is largely concerned with internet communications. The internet is accessible from computers, laptops, tablets, mobile phones, games consoles and other devices like the iPod Touch and internet connected TV. Other communication technologies such as texting and phone calls are also covered by the term ‘E-Safety’.



## Why provide internet access?

- The internet is an essential for education, business and social interaction. ELA Training Services encourage the provision of quality internet access to enable learning.

## ELA Training Services have content filtering and monitoring software in operation on their routers.

### Internet

- ELA Training Services learners will be encouraged to tell their trainer/assessor immediately if they encounter any material that makes them feel uncomfortable.

### Email:

- All emails sent must be professional in tone and content.
- ELA Training Services learners must immediately tell the trainer/assessor if they receive offensive email in an ELA led training session.
- ELA Training Services learners must not reveal personal details of themselves or others in email communication (such as address or telephone number).
- ELA Training Services learners should be made aware that the writer of an email (or the author of a web page) may not be the person claimed.

## Social Networking

### ELA Training Services trainers/assessors shall:

- Always behave responsibly and professionally in connection with the use of social networking sites and keep up to date with privacy policies of the sites they use
- Ensure that all communication with ELA Training Services learners (including on-line communication) takes place within clear and explicit professional boundaries
- Use their professional judgment and, where no specific guidance exists, take the most prudent action possible and consult with the Director of ELA Training Services if they are unsure co-operate with ELA Training Services in ensuring the implementation of this policy



### ELA Training Services Website:

- Website photographs that include ELA Training Services learners will be selected carefully and will only be published with permission.
- ELA Training Services learners' full names will not be used anywhere on the website, particularly in association with photographs.

### Cyberbullying:

- Cyberbullying is the use of the internet and related technologies to harm other people, in a deliberate, repeated, and hostile manner. When learners are the target of bullying via mobile phones, gaming or the internet, they can often feel very alone and, a once previously safe and enjoyable environment or activity, can become threatening, harmful and a source of anxiety. Cyberbullying (along with all forms of bullying) will not be tolerated. All incidents reported will be recorded and investigated.

### ELA Training Services Trainer/Assessor Data Security

- ELA Training Services trainers/assessors must not share their user account details and must not leave their computers unlocked and accessible to learners.

### ELA Training Services Learners:

- All ELA Training Services learners must sign the Code of Conduct and Learner Agreement.
- E-Safety rules will be given to learners in their learner handbook.
- Any breaches of the Code of Conduct with reference to ICT will be referred directly to ELA Training Services and internet access may be denied.

### Employers' Support:

- Employers' attention will be drawn to ELA Training Services' E-Safety Policy in the Employer handbook.



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- Employers will be asked to read through the ELA Training Services Learner Code of Conduct with their learner and for the learner to sign the agreement.

**Policy Implementation:**

- All new ELA Training Services trainers/assessors receive e-safety advice and guidance as part of their induction programme to ensure they understand their responsibilities, as detailed in this policy.
- A **whistleblower** is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a whistleblowing concern) you should report it under this policy.
- This policy should not be used for complaints relating to your own personal circumstances, such as the way you have been treated at work. In those cases you should use the Grievance Procedure or Anti-harassment and Bullying Policy as appropriate.
- If you are uncertain whether something is within the scope of this policy you should seek advice from one of the persons named at paragraph 16.8 of this policy.

**ELA TRAINING SERVICES' Data Protection Policy**

Adoption Date	Updated	Review Date	Director
10/2018	1/8/2022	1/8/2023	

**Introduction**

- ELA Ltd holds and processes information about employees, learners, employers and suppliers for academic, administrative and commercial purposes. When handling such information, ELA and all staff must comply with the General Data Protection Regulations (GDPR) which are set out in the Data Protection Act 2018 (the Act).

**In summary these state that personal data shall:**

- Be processed fairly, lawfully and in a transparent manner,
- Be obtained for a specified, explicit and lawful purpose and shall not be processed in any manner incompatible with the purpose,

- Be adequate, relevant and limited to what is necessary for the purpose
- Be accurate and up-to-date, (Inaccurate data will be erased or rectified without delay)
- Not be kept for longer than necessary for the purpose,
- Be processed in a manner that ensures appropriate security of the personal data,
- Be kept safe from unauthorised processing, and accidental loss, damage or destruction,
- Not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data, except in specified circumstances.

## Definitions

- "Data controller" is the person, authority or agency who determines the purpose and method for processing data
- "Staff", "learners" and "other data subjects" may include past, present and potential members of those groups.
- "Other data subjects" and "third parties" may include contractors, suppliers, contacts, referees, friends or family members.
- "Processing" refers to any action involving personal data, including obtaining, viewing, copying, amending, adding, deleting, extracting, storing, disclosing or destroying information.

## Notification of Data Held

- ELA will notify all staff and students and other relevant data subjects of the types of data held and processed by ELA concerning them, and the reasons for which it is processed.
- When processing for a new or different purpose is introduced the individuals affected by that change will be informed and the Data Protection Register entry will be amended.

## Staff Responsibilities

All staff shall:



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- Ensure that all personal information which they provide to ELA in connection with their employment is accurate and up-to-date;
- Inform ELA of any changes to information, for example, changes of address;
- Check the information which ELA will make available from time to time, in written or automated form, and inform ELA of any errors or, where appropriate, follow procedures for up-dating entries on computer forms. ELA will not be held responsible for errors of which it has not been informed.
- When staff hold or process information about learners, colleagues or other data subjects (for example, learners' course work, references, or details of personal circumstances), they should comply with the following:

**Staff shall ensure that:**

- All personal information is kept securely;
- Personal information is not disclosed either orally or in writing, accidentally or otherwise to any unauthorised third party. Unauthorised disclosure may be a disciplinary matter, and may be considered gross misconduct in some cases.
- When staff supervise learners doing work which involves the processing of personal information, they must ensure that those students are aware of the General Data Protection Principles, in particular, the requirement to obtain the data subject's consent where appropriate.

**Student Responsibilities**

All students shall:

- Ensure that all personal information which they provide to ELA is accurate and up-to-date;
- Inform ELA of any changes to that information, for example, changes of address;
- Check the information which ELA will make available from time to time, in written or automated form, and inform ELA of any errors or, where appropriate, follow procedures for up-dating entries on computer forms. ELA will not be held responsible for errors of which it has not been informed.



## Rights to Access Information

- Staff, learners and other data subjects in ELA have the right to access any personal data that is being kept about them either on computer or in structured and accessible manual files. Any person may exercise this right by submitting a request in writing to the appropriate designated data controller.
- ELA aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 40 days unless there is good reason for delay. In such cases, the reason for the delay will be explained in writing by the designated data controller to the data subject making the request.
- **Subject Consent:** In some cases, such as the handling of sensitive information or the processing of research data, ELA is entitled to process personal data only with the consent of the individual. Agreement to ELA processing some specified classes of personal data is a condition of acceptance of a learner on to any course, and a condition of employment for staff.
- ELA may process sensitive information about a person's health, disabilities, criminal convictions, race or ethnic origin in pursuit of the legitimate interests of ELA. For example, some jobs or courses will bring the applicants into contact with children, including young people between the ages of 16 and 18, and ELA has a duty under the Children Act 1989 and other enactments to ensure that staff are suitable for the job, and learners for the courses offered. ELA may also require such information for the administration of the sick pay policy, the absence policy or the equal opportunities policy, or for course assessment.
- ELA also asks for information about particular health needs, such as allergies to particular forms of medication, or conditions such as asthma or diabetes. ELA will only use such information to protect the health and safety of the individual, for example, in the event of a medical emergency. The consent of the data subject will always be sought prior to the collection of any sensitive data as defined by the Act.

## The Data Controller and the Designated Data Controllers


- Ali Khan is the Data Controller under the Act, and the Operations Director is ultimately responsible for implementation. Information and advice about the holding and processing of personal information is available from the Data Protection Officer –Ali Khan
- **Assessment Marks:** Learners shall be entitled to information about their marks for assessments; however this may take longer than other information to provide. ELA may withhold enrolment, awards, certificates, accreditation or references in the event that monies are due.




- **Retention of Data:** ELA will keep different types of information for differing lengths of time, depending on legal, academic and operational requirements.
- **Compliance:** Compliance with the Act is the responsibility of all learners and members of staff. Any deliberate or reckless breach of this Policy may lead to a disciplinary hearing, and where appropriate, legal proceedings. Any questions or concerns about the interpretation or operation of this policy should be taken up with the Data Protection Officer.
- Any individual, who considers that the policy has not been followed in respect of personal data about him or herself, should raise the matter with the Data Controller initially. If the matter is not resolved it should be referred to the staff grievance or learner complaints procedure.

**Policy Review:**

The effectiveness of this policy and associated arrangements will be reviewed annually under the direct supervision of the Director of Operations.

Adoption Date	Updated	Review Date	Director
10/2018	1/8/2022	1/8/2022	

**ELA Training Services' Photography Policy and Procedure**

Adoption Date	Updated	Review Date	Director
10/2018	1/8/2022	1/8/2022	

**Using images of learners: photographs, videos, websites and social media**

- We live in an age in which digital technology has vastly increased the use, and potential misuse of photography. Photographs for ELA Training Services, learner and trainer/assessor uses and those that appear in the media and ELA Training Services social media, are a source of pleasure, pride and celebration of learner achievement. However, learners are often abused by someone they know. The risk of a learner being directly targeted for abuse through being identified by a stranger is very small. Providing reasonable steps are taken to ensure an appropriate photograph, and to protect the full name and contact details, photography by ELA Training Services staff and the media is allowed, within safe practice guidelines.

## Issues of Consent

- The Data Protection Act 2018 affects our use of photography. This is because an image of a learner is personal data for the purpose of the Act, and it is a requirement that consent is obtained from the parent of a young person under the age of 18 years for any photographs or video recordings. It is also important to ascertain the views of the young person.
- Consent may be sought on the Learner Application form for images to be used by ELA Training Services.
- Employers retain the right to withdraw Trainers/assessors and other stakeholders may not use images of ELA Training Services or learners online without the express consent, in writing of ELA Training Services.
- Consent at any stage, but they need to do so in writing.

### ELA Training Services will:

- Never use a learner’s full name online to accompany a photograph
- Use the minimum information necessary to accompany a photograph
- Only use images of learners in suitable dress
- Store photographs securely for authorised ELA Training Services use only
- Only use images of under 18s where permission has been granted

## ELA Training Services’ Health, Safety and Welfare Policy

Adoption Date	Updated	Review Date	Director
10/2018	1/8/2022	1/8/2023	

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- ELA Training Services is committed to providing a safe and healthy working environment for all employees and clients. We therefore regard health and safety as a priority and an integral part of our business.
- The Health and Safety at Work Act 1974 together with other related regulations, place specific responsibilities on both employers and employees. We intend, as a matter of policy, to comply, so far as is reasonably practicable, with all health and safety requirements.
- When working with funded learning provision, ELA Training Services will endeavour to support and so far as is reasonably practicable, learners and stakeholders in a safe and constructive manner.

ELA TRAINING SERVICES is committed to providing and maintaining:

- Safe and healthy working conditions
- Relevant, appropriate and serviceable work equipment
- The safe storage, handling and use of hazardous substances
- Appropriate information, instruction and training for all staff to ensure competency
- The identification and control of health and safety risks arising from work activities
- An accident and work related ill health reporting, recording and investigation system
- A mechanism for consulting with staff on safety related topics
- Directors, managers and employees have the responsibility for implementing the safety policy throughout the business operation. The specific arrangements for the operation of the policy and the personnel responsible for implementation are detailed in this policy document.
- This Policy will be continually monitored and updated, particularly when changes in the scale and nature of the business operations occurs. As a minimum, the policy will be reviewed at least every 12 months.

Review Date:	25/4/2018	Review Date:	1/8/2021
Review Date:	1/8/2019	Review Date:	1/8/2022
Review Date:	1/8/2020	Review Date:	



## Section 2: Safety Responsibilities

### • Introduction

• All managers and employees are responsible for completing their work in a manner that will not put their personal health and safety at risk or that of their colleagues or anyone that may be affected by their actions or omissions. Therefore it follows that all managers and employees have the right and the responsibility to decline to complete any work activity, which they consider to be unsafe.

### • Operations Director

The Operations Director will ensure that:

- There is an effective and efficient approach to health and safety within all parts of ELA Training Services
- The necessary resources are made available to provide competent safety management and for the continuous improvement of health and safety within ELA Training Services.
- There is a suitable organisation structure for planning, implementing, monitoring, reviewing and evaluating health and safety arrangements
- Policies and procedures are developed to meet legal, moral and best practice obligations
- All levels of management understand, actively support and implement ELA Training Services' Health and Safety Policy and associated procedures
- Employees with specific responsibilities have the necessary authority, expertise, training and resources to exercise their responsibilities effectively
- All staff are consulted on health and safety matters, by ensuring that safety is included as an agenda item at each of the ELA Training Services staff meetings

### • Directors

Within their specific division each Director will ensure that:

- There is an effective and efficient approach to health and safety within their specific division of ELA Training Services.



- There is a suitable organisation structure for implementing health and safety arrangements
- Specific safety policies, procedures and documentation are implemented effectively
- All staff within their area of control understand, actively support and implement ELA Training Services' Health and Safety Policy and associated procedures
- All staff are consulted on health and safety matters, by ensuring that safety is included as an agenda item at each of the ELA Training Services staff meetings

- **Managers**

All Managers will ensure that:

- There is an effective and efficient approach to health and safety within their department/area
- There is a suitable organisation structure for implementing health and safety arrangements
- They and their staff understand their responsibilities for health and safety, as defined in the health and safety policy and are capable of performing their duties to the required standard
- There is a consistent implementation of ELA Training Services policies and procedures within their area of accountability
- All staff under their control are properly trained and supervised, and in particular, receive adequate induction training and on and off the job training in appropriate aspects of health, safety and welfare
- That they complete risk assessments for their office areas/teams/tasks within their responsibility and implement the risk assessment findings
- Maintain high standards of housekeeping in their offices/teams
- That all accidents to staff, visitors and funded learners are recorded, reported and investigated by a competent person in accordance with the ELA Training Services accident system.



- That they co-operate with the Operations Director, Directors and Safety Advisor on health and safety matters and that they complete any other reasonable health and safety activity

- **Team Leaders/Supervisors**

All Team Leaders will ensure that:

- There is an effective and efficient approach to health and safety within their department/area
- There is a suitable organisation structure for implementing health and safety arrangements
- They and their staff understand their responsibilities for health and safety, as defined in the health and safety policy and are capable of performing their duties to the required standard
- There is a consistent implementation of ELA Training Services policies and procedures within their area of accountability
- All staff under their control are properly trained and supervised, and in particular, receive adequate induction training and on and off the job training in appropriate aspects of health, safety and welfare
- That they complete risk assessments for their office and teams within their area of responsibility and implement the risk assessment findings
- Maintain high standards of housekeeping in their offices/teams
- That all accidents to staff, visitors and funded learners are recorded, reported and investigated by a competent person in accordance with the ELA Training Services accident system.
- That they co-operate with the Operations Director, Directors and Safety Advisor on health and safety matters and that they complete any other reasonable health and safety activity.



- **Health and Safety Advisor**

The Health and Safety Advisor has specific responsibilities which include:

- The provision of advice, guidance and changes in safety legislation to the ELA Training Services Operations Director, Directors, managers and staff
- The development and updating of all health and safety policy, arrangements, procedures and documentation
- The provision of advice and assistance where required during the investigation of accidents
- Ensuring that the ELA Training Services Health and Safety Policy is reviewed and updated in line with the operational needs of the business

- **Employees**

All members of staff have a duty to:

- Take reasonable care of the health and safety of themselves and of other persons who may be affected by their acts and omissions at work
- Co-operate with their employer to enable the employer to perform, or comply with, any legal duty or requirement
- Not to interfere with, or misuse, equipment provided in the interest of health and safety
- Use equipment, procedures and documentation provided for their work as they have been trained
- Not to use equipment they have not been trained to use
- Inform their manager of any work situation that represents a serious and immediate danger to themselves and others
- Report all accidents immediately and enter the details in the accident book
- Keep their working area and work equipment clean and tidy to minimise risk



## Section 3: Safety Arrangements

### • **Accident Reporting - ELA Training Services employees Aims**

- The aim of this procedure is to ensure that all accidents, occupational diseases and dangerous occurrences, involving ELA Training Services employees, are reported and investigated to determine the cause and appropriate action taken to prevent a re-occurrence.

### **Rationale**

- ELA Training Services is responsible for ensuring, so far as is reasonably practicable, the health, safety and welfare of staff, visitors and learners whilst participating on funded programmes.

### **Principles**

- All accidents must be recorded in the ELA Training Services' local centre Accident Book. Accidents resulting in a 3 day absence from work exceeding 3 or more days, and accidents reportable under R.I.D.D.O.R should be reported to the Health and Safety Advisor and the Health and Safety Executive.

### **Roles and Responsibilities Trainer/Assessors**

- All trainer/assessors must be report all accident in the ELA Training Services local accident book. As outlined above, if it is a Road traffic accident then the Operations Director must be informed.

### **Managers/Team Leaders**

- All managers/team leaders are responsible for informing staff that all accidents must be recorded and ensuring that all accidents are investigated and reports submitted immediately to the Health and Safety Advisor.

### **Directors**

- Where it is deemed necessary and appropriate, the Health and Safety Advisor should inform the Directors and the Operations Director. An investigation should then be completed, to identify the accident causes and any remedial action.



## Management of Systems

### Reporting Of Injuries, Diseases and Dangerous Occurrence Regulations (1995) Fatality/Specified Injury/Over seven day injury/Dangerous Occurrence

- In the event of a RIDDOR reportable incident, or an occupational disease, the relevant manager must inform the Health and Safety Advisor immediately. Once investigated, the Health and Safety Advisor must inform the relevant enforcing authority (Health and Safety Executive HSE) by the quickest means possible, usually by telephone or on the Internet, and then submit a form F2508/F2508A to them within 15 days of the incident occurring.
- The Health and Safety Advisor should retain a copy of the form for recording purposes.

### Follow up Action

- The Manager, in conjunction with the Safety Advisor should ensure that all remedial actions to prevent a re-occurrence are completed within an agreed time scale.

The Health and Safety Advisor should review all accident and incident reports, F2508 forms, F2508A forms, and recommend further action as appropriate to the Operations Director and Directors.

- **FIRST AID PROVISION**

### Aims

ELA Training Services has a duty under the Health and Safety First Aid Regulations, to provide suitable and sufficient first aid facilities for all staff.

### Rationale

ELA Training Services is responsible for ensuring, so far as is reasonably practicable, the health, safety and welfare of staff and visitors.

### Principles

ELA Training Services will inform all employees of the arrangements that have been made in connection with the provision of first aid facilities, including equipment and those employees trained in first aid.



## Roles and Responsibilities Trainer/Assessors

- All trainer/assessors are to be aware of the location of relevant first aid kits, including in their vehicles if relevant, and the location of first aid qualified staff

## Managers/Team Leaders

- All managers/team leaders are responsible for ensuring the provision of and the re-stocking of relevant first aid kits with their areas of responsibility.

## Directors

- All Directors are responsible for ensuring that their teams/divisions have access to relevant first aid provision.

## Management of Systems

To meet this requirement ELA Training Services will:

- Display on notice boards (company intranet), the names and telephone numbers of any employees trained in first aid
- Provide access for all staff to an adequately stocked first aid kit, which will be clearly identified. Including where appropriate travelling first aid kits
- Arrange for the continuity of training to maintain a satisfactory number of employees qualified in first aid, (one per office location)

During induction training, employees will be informed of:

- Their responsibilities in the event of an accident
- The location of their local First Aider and first aid kit
- First aid and accident reporting procedures
- Whilst ELA Training Services has no legal responsibility to provide assistance for nonemployees, it is our policy to provide emergency cover for visitors and contractors on the premises of ELA Training Services, to ensure safe evacuation to the nearest medical services.



## • Fire Safety Management

### Aims

- This procedure outlines the principals of fire safety management for ELA Training Services.

### Rationale

- ELA Training Services is responsible for ensuring, so far as is reasonably practicable, the health, safety and welfare of staff and visitors at each company centre location.

### Principles

- ELA Training Services will inform all employees of the arrangements that are in place in relation to fire safety management and safe evacuation from premises

### Roles and Responsibilities Trainer/Assessors

- All trainer/assessors must ensure that they are familiar with the mechanism for raising the alarm, the evacuation procedure and routes and the assembly point at each location where they work or visit.

### Managers/Team Leaders

- All managers/team leaders are responsible for informing staff of the fire safety management system for each specific office location.

### Directors

- All Directors are responsible for ensuring that their teams/divisions are fully aware of the fire safety management system for each specific office location.

### Management of Systems

- All employees are required to familiarise themselves and understand the Fire and Emergency Evacuation procedures for ELA Training Services' office.

### Please ensure that you know:





The location of your nearest FIRE EXIT and where it exits the building;

### **The Assembly Point;**

The locations of your nearest fire alarm call point

- As part of the induction programme, each employee will be briefed on the evacuation route(s), the fire alarm call points and the location of the Assembly Point.
- Fire risks for ELA Training Services' centres or areas of the premises will be assessed by the relevant manager in conjunction with the Health and Safety Advisor, as part of the risk assessment programme. The Fire Risk Assessment document is at appendix HS001 of the Safety Policy.
- The Business Centre landlords are responsible for ensuring that fire appliances on the premises are tested regularly with the tests recorded. This is completed, under contract.

What to do in the case of fire

- By the Person discovering the fire:
  - Ensure that no one is in immediate danger
  - Sound the fire alarm at the nearest break glass alarm point (the 'Break Glass' alarm points are on the main exit routes); and
  - Leave the building by the nearest FIRE EXIT and go to the Assembly Point
- By all other staff not committed to specific Fire Duties, on hearing the alarm:
  - Leave the building via the nearest FIRE EXIT
  - Do not return to your desk to collect personal belongings
  - Go straight to the Fire Assembly Point, obeying the instructions of the Fire Wardens
  - If you have visitors with you, please ensure they are escorted safely from the building to the Fire Assembly Point



## Further Information

<https://www.gov.uk/government/publications/making-your-premises-safe-from-fire>

<https://www.gov.uk/workplace-fire-safety-your-responsibilities>

<https://www.gov.uk/workplace-fire-safety-your-responsibilities/fire-safety-advice-documents>

- One specific fire evacuation procedure per centre as an appendix Provision of a fire file for each ELA Training Services centre

### • Premises Safety

## Aims

- The aim of this procedure is to outline the safety system used in each ELA Training Services Centre.

## Rationale

- ELA Training Services is responsible for ensuring, so far as is reasonably practicable, the health, safety and welfare of staff through whilst working within a ELA Training Services' Centre.

## Principles

- Ensuring the Health, safety and welfare of staff whilst based in or working within the ELA Training Services Centre.

## Roles and Responsibilities Trainer/Assessors

- All trainer/assessors must ensure that they are familiar with the safety system within the ELA Training Services Centre

## Managers/Team Leaders

- All managers/team leaders are responsible for ensuring the health and safety of their team whilst based in the ELA Training Services Centre.



## Management of Systems

- ELECTRICAL SYSTEMS AND EQUIPMENT POLICY

It is the policy of ELA Training Services to comply with the Electricity at Work Regulations.

We will reduce electrical hazards to a minimum by using:

- Competent or qualified persons for any repair maintenance tasks
- Competent or qualified persons for regular inspecting and testing
- Safe systems of work for all work carried out on electrical systems
- Safe, suitable and approved materials and equipment
- Regular inspections and testing shall be carried out with electrical installations being tested every five years. Portable appliance testing will take place at a frequency determined by the risks associated with their use. Electrical risks will be assessed as part of the Management Risk Assessment.
- All employees are reminded that no personal portable electrical equipment, i.e. kettles, fans, etc, are permitted onsite unless presented for inspection, tested and authorised.

- **Visitors Policy**

- ELA Training Services accepts our duty to protect visitors to our premises from harm and recognise also that visitors may pose a risk to our employees. Therefore our policy for the control and well-being of visitors on our premises is as follows:
  - We will ensure that we know visitors are onsite by requiring them to sign in and out in the visitors book, as defined within each Business Centre location
  - In the event of a fire alarm, the person who is accompanying the visitor should take the visitor to the assembly point and ensure that they remain there until it is safe to return to the premises.
  - We will provide assistance if necessary and ensure all casualties are evacuated to the nearest medical services, if appropriate.



## • **Welfare Facilities**

- In line with the requirements of the Workplace (Health, Safety and Welfare) Regulations 1992, ELA Training Services is committed to providing a safe place of work, with appropriate welfare facilities. These will include the following:
  - The provision of a good working environment, with all appropriate health and safety support facilities.
  - Safe access to, and egress from the office environment.
  - General welfare facilities, to include:
    - Hot beverage areas
    - Cold water supply
    - Toilet facilities
  - In the provision of all of the above facilities, all employees have the responsibility to ensure that such facilities are not abused or misused. All employees are requested to support the organisation in maintaining a high standard of welfare facilities, and also to report where such standards are not maintained.
  - ELA Training Services requires good housekeeping at all times within the centre. It is the responsibility of all managers to ensure that these standards are met within their department/team.

## • **Risk Management**

### **Aims**

- The aim of this procedure is to outline the risk management system used throughout ELA Training Services.

### **Rationale**

- ELA Training Services is responsible for ensuring, so far as is reasonably practicable, the health, safety and welfare of staff through the implementation of a robust risk management programme.



## Principles

- The primary risk management principals are the identification of significant risks and the implementation of suitable control measures to eliminate or minimise the risks identified.

## Roles and Responsibilities Trainer/Assessors

- All trainer/assessors must ensure that they are familiar with the risk management system and associated documentation.

## Managers/Team Leaders

- All managers/team leaders are responsible for completing all specific risk assessments, as part of the risk management system, within their area of control or team.

## Directors

- All Directors are responsible for ensuring that risk assessments are completed, as part of the risk management system, within their division or team.

## Management of Systems

- It is the policy of ELA Training Services to carry out suitable and sufficient risk assessments of the risks to health and safety of our employees, and to others who might be affected by our work activities.

### To ensure that this happens we will:

- Identify all hazards with a potential to cause harm to our employees and others who may be affected by our activities
- Evaluate the probability and severity of potential injury or damage
- Analyse the options for eliminating, reducing or controlling the identified risks and then take the appropriate action
- Review the assessments periodically and particularly where they may no longer be valid or where there has been a significant change in the work activities or processes



- The company strongly recommends staff refrain from using any personal mobile phone or device in their possession when driving any non-company vehicle

**Further Information** [www.hse.gov.uk/workplacetransport/drivingforwork.htm](http://www.hse.gov.uk/workplacetransport/drivingforwork.htm)  
[www.hse.gov.uk/roadsafety/](http://www.hse.gov.uk/roadsafety/) [www.hse.gov.uk/pubns/indq382.pdf](http://www.hse.gov.uk/pubns/indq382.pdf)

## • Working from Home

### Aims

The aim of this procedure is to outline the policy on home working within ELA Training Services. Home workers are those people contracted to work at home for an employer.

### Rationale

ELA Training Services is responsible for ensuring, so far as is reasonably practicable, the health, safety and welfare of staff.

### Principles

It is the position of ELA Training Services that whilst a number of staff may choose to work from home occasionally, there are no contracted home workers, as the normal place of work is the office

### Roles and Responsibilities Trainer/Assessors

Trainer/assessors may, provided the business of the organisation is not inconvenienced and the line manager is in agreement, request to work at home if needed.

Employees should note that there is no right to work at home and that they are normally required to be present at their place of work.

### Managers/Team Leaders

Managers/Team Leaders should not unreasonably refuse a request to work from home.

### Management of Systems



There is no contractual right to home working. However the view of ELA Training Services that where necessary, provided the business of the organisation is not inconvenienced and the line manager is in agreement, employees can work at home if needed.

### **Roles and Responsibilities Trainer/Assessors**

- All trainer/assessors must ensure that they are familiar with the ELA Training Services stress management principals.

### **Managers/Team Leaders**

- All managers/team leaders are responsible for monitoring workloads within their area of control or team and if required implementing the ELA Training Services stress management principals.

### **Directors**

- All Directors are responsible for monitoring the staff within their division or team and if required implement the ELA Training Services stress management principals.

### **Management of Systems**

- ELA Training Services will endeavour to comply with all legislation and good working practices and to aim to identify sources of stress in the workplace. Subsequently we will address areas of concern with the prime purpose of achieving a healthy workforce in which stress levels are as low as practicable.

### **To achieve this we will:**

- Prevent stress by trying to control pressures to which employees are exposed.
- Encourage timely reaction by managers and the ability to recognise and deal with stress amongst employees as it arises.
- Promote and develop a supportive attitude to those employees identified as suffering from stress, including the development of strategies to deal with particular circumstances.
- Providing appropriate skills, training and resources needed for employees to do their jobs.
- Monitor for excessive working hours.



## Monitoring

- The following reports will be located on each personal file and will be used to monitor stress and provide an objective means of assessing the level of the problem and devising strategies for improvement:
  - Absence (reports on levels and reasons for employee absence).
  - Employee appraisal and development.

**Further Information** [www.hse.gov.uk/stress/](http://www.hse.gov.uk/stress/)

- **Training**

## Aims

- The aim of this procedure is to outline the safety specific training throughout ELA Training Services.

## Rationale

- ELA Training Services is responsible for ensuring, so far as is reasonably practicable, the health, safety and welfare of staff. Safety competency is an integral part of this responsibility.
- In order to undertake their job roles all staff should be safety-competent through a number of mechanisms including specific safety-related training.

## Roles and Responsibilities Trainer/Assessors

- All trainer/assessors must ensure that they complete all training requests by ELA training services. This includes the ELA Training Services induction programme and all job specific safety related training courses.

## Managers/Team Leaders

- All managers/team leaders are responsible for ensuring that all staff within their area of control complete all ELA Training Services and occupationally-specific training.





## Directors

- All Directors are responsible for ensuring that all staff within their area of control complete all ELA Training Services an occupationally specific training.

## Management of Systems

- ELA Training Services recognise the importance and value of health and safety training and are committed to providing adequate information, instruction and training for all employees. Training will be given in accordance with the requirements of the job role and tasks to be undertaken.
- ELA TRAINING SERVICES will ensure that all new employees receive induction training covering the following, but will not be limited to:
  - Health and Safety Policy
  - Statutory and funding agency accident reporting procedures
  - Fire arrangements and first aid facilities
  - Safe manual handling
  - Risk assessment policy
  - Employee responsibilities
- All staff who undertake ELA Training Services Registrations of employers must complete a bespoke training course accredited by the Chartered Institution of Occupational Safety and Health.
- In addition to the above, additional specific information will be provided, relevant to the employees particular tasks or job, which will be arranged by the relevant Manager/Team Leader.

**Further Information** [www.hse.gov.uk/simple-health-safety/consult.htm](http://www.hse.gov.uk/simple-health-safety/consult.htm)

- **Young Persons**



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## Aims

- The aim of this procedure is to outline the system used throughout ELA Training Services for managing young people who are employees of ELA Training Services.

## Rationale

- ELA Training Services is responsible for ensuring, so far as is reasonably practicable, the health, safety and welfare of young people (under 18 years of age), employed by the company.

## Principles

- ELA Training Services will aim to prevent or reduce risks to young people employed by the company through the completion of risk assessments to identify any risk to their health arising from work activities.

## Roles and Responsibilities Trainer/Assessors

- All trainer/assessors must ensure that they are familiar with the risk management process for young people employed by ELA Training Services.

## Managers/Team Leaders

- All managers/team leaders are responsible for implementing and managing the risk management of young people within their team or ELA Training Services Centre.

## Directors

- All Directors are responsible for ensuring that any young person within their division or team is safe and that all safety systems specific to young people are implemented effectively.

## Management of Systems

- The management of young people is based on risk assessment. The risk assessment will take account of the young person's inexperience, lack of awareness and perception of risk in the workplace. The young person's job role will be assessed, on an individual basis, by their Manager/Team Leader - Appendix HS 008.



It is also our policy to prevent or reduce risks to young person by ensuring that they do not:

- Undertake any manual handling tasks without training and supervision
- Operate machinery e.g. shredders without training and supervision
- Spend excessive time at a workstation without taking adequate breaks
- Consultation and Communication with Employees

## **Aims**

- The aim of this procedure is to outline the mechanisms used to consult with staff on safety related matters throughout ELA Training Services.

## **Rationale**

- ELA Training Services is responsible for ensuring, so far as is reasonably practicable, the health, safety and welfare of staff. Consultation is a key element of this responsibility.

## **Principles**

- Consultation and communication are fundamental principles of an effective and robust safety culture.

## **Roles and Responsibilities Trainer/Assessors**

- All trainer/assessors must ensure that they attend all team meetings and raise any safety related issues with their manager/team leader.

## **Managers/Team Leaders**

- All managers/team leaders must progress any safety-related points raised by their team. This includes implementing any control measures and providing feedback to their staff.

## **Directors**

- All Directors are responsible for responding to any safety related issue raised by a member of staff within their division or team.



## Management of Systems

- In accordance with the requirements of the Health and Safety (Consultation with Employees) Regulations 1996 and the Management of Health and Safety at Work Regulations 1999, ELA Training Services is committed to ensuring the Health, Safety and Welfare of all its employees whilst at work.
- Consultation and communication with employees on health and safety matters is a key element to the successful achievement of this objective. All employees are responsible for providing feedback on their views/concerns about the health and safety arrangements and to also report any defects or failings they identify. Consultation with employees will be undertaken by the inclusion of health and safety as a standing agenda item on all team meetings.
- A timetable of consultation meetings, held every four months, will be published.

**Further Information** [www.hse.gov.uk/simple-health-safety/consult.htm](http://www.hse.gov.uk/simple-health-safety/consult.htm)

- **Alcohol, Drugs and Solvents**

### Aims

- The procedure outlines the policy on alcohol and drugs throughout ELA Training Services.

### Rationale

- ELA Training Services is responsible for ensuring, so far as is reasonably practicable, the health, safety and welfare of staff.

### Principles

- To ensure that employees do not expose themselves or other persons to risk from alcohol or drug misuse or abuse whilst at work.

### Roles and Responsibilities Trainer/Assessors

- All trainer/assessors are responsible for reporting any work related alcohol or drug abuse to their Manager/Team Leader.



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## Managers/Team Leaders

- All managers/team leaders are responsible for investigating any alcohol or drug related issue raised by a member of staff, within their area of control or team.

## Directors

- All Directors are responsible for investigating any alcohol or drug related issue reported to them by a member of staff.

## Management of Systems

- ELA Training Services is concerned that employees do not expose themselves or other persons to risks to their health or safety by acts or omissions at work. It is therefore the policy of ELA Training Services that all employees are fit and well when at work, as follows: No person will be allowed at work if they are under the influence of alcohol, drugs or solvents.
- Any employee who is aware of any person who is at work and under the influence of alcohol, drugs or solvents must report the matter immediately to their manager.
- Employees who are taking medication or prescribed drugs, which may affect their actions or reactions whilst at work, should inform their manager. Appropriate adjustments to the employee's day to day tasks may, or may not then be deemed necessary.
- The use of uncontrolled drugs or solvents whilst at work or being under the influence whilst at work, including being under the influence of alcohol, is considered by ELA Training Services to be very serious and subject to the same disciplinary action as any act of gross misconduct.
- The relevant Manager/Team Leader is initially responsible for dealing with any alcohol or drug related issues within their team or area of control.

**Further Information** [www.hse.gov.uk/alcoholdrugs/](http://www.hse.gov.uk/alcoholdrugs/)  
[www.hse.gov.uk/alcoholdrugs/alcohol.htm](http://www.hse.gov.uk/alcoholdrugs/alcohol.htm)



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## • Lone-Working Policy

### Aims

- The aim of this procedure is to outline the system for lone-working by ELA Training Services staff.

### Rationale

- ELA Training Services is responsible for ensuring, so far as is reasonably practicable, the health, safety and welfare of staff, including whilst working alone.

### Principles

- The management of staff who work alone in an ELA Training Services centre, or who work away from a fixed base will be managed as part of the risk management process.

### Roles and Responsibilities Trainer/Assessors

- All trainer/assessors must ensure that they are familiar with the lone worker management system and associated documentation.

### Managers/Team Leaders

- All managers/team leaders are responsible for managing lone working of staff and for completing all specific risk assessments, as part of the risk management system, within their area of control or team.

### Directors

- All Directors are responsible for ensuring Managers and Team Leaders manage lone working of staff as part of the risk management system, within their division or team.

### Management of Systems

- ELA Training Services recognises its responsibility to assess the risks to lone workers and to take steps to avoid or control the risk where necessary. Where relevant to the employee's job role this will be highlighted as part of the Management Risk Assessment completed by Managers/Team Leaders.



**Lone workers can be grouped into the following areas:**

- Workers in fixed establishments
- Mobile workers working away from their fixed base.

Within our organisation, the second category pre-dominantly applies, where certain employees may be required to visit commercial premises as part of their duties.

Where this is necessary, the following steps should be followed:

- The employee should ensure that the calendar within their PC is fully up to date, highlighting their offsite location
- The employee must have a mechanism for raising the alarm e.g. a mobile phone
- Regular contact is made between the employee and the office using a phone

**Examples of occurrences which may happen whilst working alone are:**

- A road traffic accident
- Personal attack
- Involvement in a major incident
- Any other professional concern
- In the first instances, any of these occurrences should be reported to the relevant Manager/Team Leader immediately.
- Each team leader should define and agree the lone working systems and include this in the area induction.
- Where appropriate Lone Working will be assessed, on an individual basis, by the employees Manage/Team Leader during the completion of the Management Risk Assessment. The specific Lone Worker Risk Assessment can be located at appendix HS01 2 of the Safety Policy.



**Further Information** [www.hse.gov.uk/toolbox/workers/lone.htm](http://www.hse.gov.uk/toolbox/workers/lone.htm)  
[www.hse.gov.uk/pubns/indg73.pdf](http://www.hse.gov.uk/pubns/indg73.pdf)

- **Driving Policy**

## **Aims**

The aim of this procedure is to outline the policy on managing risk from ELA Training Services staff driving for work.

## **Rationale**

ELA Training Services is responsible for ensuring, so far as is reasonably practicable, the health, safety and welfare of staff, including whilst driving a motor vehicle in the course of their employment.

## **Principles**

To ensure, so far as is reasonably practical, the safety of relevant staff, other road users and pedestrians, whilst driving for work purposes.

## **Roles and Responsibilities Trainer/Assessors**

All trainer/assessors must ensure that they are familiar with the driving policy and associated documentation.

## **Managers/Team Leaders**

All managers/team leaders are responsible for implementing any specific requirements of the driving policy for staff within their area of control or team.

## **Directors**

All Directors are responsible for ensuring that Managers/Team Leaders implement the driving policy for staff within their division or team.

## **Management of Systems**

It is ELA Training Services policy that employees undertaking driving duties are competent to drive the vehicle being used. This can be an ELA Training Services contract vehicle, or a private vehicle owned by the member of staff and used for business. To that effect, those employees shall maintain a current UK driving licence.





- Where the maintenance of a driving licence is a condition of the employment of staff, those who lose their licence through the courts must report the loss to their manager.
- Drivers are expected to abide with all applicable road traffic legislation and the Highway Code.
- When employees are driving any vehicle on ELA Training Services business, they should consider the following points:
  - Concentrate at all times in order to avoid accidents
  - Do not drive excessively for long periods. When you feel tired, stop at a safe location and rest
  - Know the capabilities of your vehicle and exercise restraint
  - Consider other road users, giving the correct signals in good time
  - Drive at the permitted speed limit only
  - Know the Highway Code, and apply it
- Where the employee uses their own vehicle for business use, it is the responsibility of the employee to ensure that the vehicle is serviced, has a current MOT and a business use insurance policy.
- Employees must be aware of any prescription medication, which may result in drowsiness or any other incapacity whilst driving.
- Should an employee be involved in a road traffic accident, whilst on company business, it is the responsibility of the manager to report the incident, in writing to the Health and Safety Advisor.
- Employees are reminded that when attending client's premises, they must abide and adhere to all health and safety arrangements applicable to that location.
- The Highway Code, the Department of Transport and the Health and Safety Executive guidance, states that drivers should take a 15 minute break in every 2 hours of driving.
- All staff, on ELA Training Services business, are not to drive for an excessive period and put themselves and other road users in danger.



Any concerns over driving on ELA Training Services business should be referred to the relevant Manager/Team Leader.

## • **In Car Communication Equipment**

- The use of a telephone handset in a vehicle, whilst the vehicle is in motion, is contrary to the requirements of the Highway Code, the Approved Code of Practice, which supports the Road Traffic Act. A Police prosecution of "driving without due care and attention" is therefore possible, sighting the requirements of the Highway Code.
- All company employees are issued with a company phone for use in connection with their duties. The company may change the choice of provider as it deems necessary but currently all calls made between staff using their company mobile phone are free. Therefore any phone communication between staff should be made on your company mobile.
- Individual staff may use their mobile phone for reasonable personal use, but not for overseas calls or premium rate number calls unless directly concerned with company business. Line managers will determine excessive use of personal calls to set limits or seek repayment of excessive costs.
- Mobile phones from ELA Training Services have the facility to photograph, video and audio record. These facilities are to enable staff to record evidence for learners' apprenticeship qualifications and to record other documentation required for company purposes. It is the duty of all staff to fully familiarize themselves to operate these features on their company mobile phone.
- The company does not require any member of staff to use their mobile phone while driving their vehicle, (whether a company vehicle, their own vehicle or any other vehicle they may be driving). This applies whether a hands-free device or not is available.
- Therefore it is not permitted for any member of staff to make or receive calls or texts whilst driving using their company mobile phone or similarly to use any other mobile phone or device in their possession to make or receive calls or texts on company business. Breaking or ignoring this policy will result in disciplinary action being taken. Furthermore staffs are forbidden to use any other mobile phone or device in their possession to make or receive personal calls or texts whilst driving a company vehicle. This policy applies at all times whenever the person is driving a company vehicle, including home to work and company business trips and at all times when the person has a company mobile phone whilst driving any other vehicle.



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- The company strongly recommends staff refrain from using any personal mobile phone or device in their possession when driving any non-company vehicle

**Further Information** [www.hse.gov.uk/workplacetransport/drivingforwork.htm](http://www.hse.gov.uk/workplacetransport/drivingforwork.htm)  
[www.hse.gov.uk/roadsafety/](http://www.hse.gov.uk/roadsafety/) [www.hse.gov.uk/pubns/indq382.pdf](http://www.hse.gov.uk/pubns/indq382.pdf)

## • Working from Home

### Aims

- The aim of this procedure is to outline the policy on home working within ELA Training Services. Home workers are those people contracted to work at home for an employer.

### Rationale

- ELA Training Services is responsible for ensuring, so far as is reasonably practicable, the health, safety and welfare of staff.

### Principles

- It is the position of ELA Training Services that whilst a number of staff may choose to work from home occasionally, there are no contracted home workers, as the normal place of work is the office

### Roles and Responsibilities Trainer/Assessors

- Trainer/assessors may, provided the business of the organisation is not inconvenienced and the line manager is in agreement, request to work at home if needed.
- Employees should note that there is no right to work at home and that they are normally required to be present at their place of work.

### Managers/Team Leaders

- Managers/Team Leaders should not unreasonably refuse a request to work from home.

### Management of Systems

- There is no contractual right to home working. However the view of ELA Training Services that where necessary, provided the business of the organisation is not inconvenienced and the line manager is in agreement, employees can work at home if



**Further Information** [www.hse.gov.uk/toolbox/workers/home.htm](http://www.hse.gov.uk/toolbox/workers/home.htm)

## • **Placement Employer Vetting Systems**

### **Aims**

- The aim of this procedure is to outline the standard system for completing the placement employer site registration process by all staff throughout ELA Training Services.

### **Rationale**

- ELA Training Services is responsible for verifying, so far as is reasonably practicable, that employers who accept funded training provision are complying with their statutory business obligations.

### **Principles**

- To ensure the completion of a robust placement employer site registration prior to the commencement of funded training.

### **Roles and Responsibilities Trainer/Assessors**

- All trainer/assessors must ensure that they are familiar with the placement employer management system and associated documentation. Every assessor who undertakes the site registration must be competent and have completed the IOSH accredited bespoke training course.

### **Managers/Team Leaders**

- All managers/team leaders are responsible for ensuring that the placement employer site registration management system and associated documentation is implemented in an effective and robust manner within their area or team.

### **Directors**

- All Directors are responsible for ensuring that placement employer management system and associated documentation is implemented effectively within their division or team.



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## Management of Systems

- Relevant procedures and associated documentation used by ELA Training Services for the implementation of the placement employer vetting and monitoring systems are contained within Appendix HS009 to the Safety Policy.

- **Safe Learner Systems**

- When working with young people, ELA Training Services will endeavour to verify a placement by way of an employer induction and include safety at each progress review meeting.

- Relevant procedures and associated documentation used by ELA TRAINING SERVICES for the implementation of the safe learner systems are contained within Appendix HS 010 to the Safety Policy

- **Off-Site Learning Provision**

- Prior to any learning taking place with Learners at an off-site venue, the Trainer Assessor must visit the venue and complete the Delivery Venue Checklist with the venue representative.

- To ensure that the venue is a safe, healthy and supportive environment for learning, the Delivery Venue Checklist should be completed in full and signed by the Trainer Assessor and a representative of the venue. The Delivery Venue Checklist can be located at Appendix HS 011 to the Safety Policy.

- Any areas of concern raised during the completion of the checklist should be forwarded to the Director of Operations in the first instance.

- **Management Review & Audit**

## Aims

The aim of this procedure is to outline system for completing a review and audit of the ELA Training Services Safety Management System.

## Rationale

ELA Training Services is responsible for ensuring, so far as is reasonably practicable, the health, safety and welfare of staff.



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## Principles

- To ensure the health, safety and welfare of staff is achieved by way of the development, implementation and review of a robust safety management system

## Roles and Responsibilities Trainer/Assessors

- All trainer/assessors must ensure that they are familiar with and comply with the contents of the safety management system and co-operate with any review undertaken.

## Managers/Team Leaders

- All managers/team leaders are responsible for implementing the management system, raising any concerns or requests for change and playing any active part in the review process.

## Directors

- All Directors are responsible for working with the Safety Advisor as part of the review process and for authorising any developments and changes within the safety management systems.

## Management of Systems

- It is the policy of Ela Training Services to ensure that the safety management system is robust and dynamic. To achieve this, we will regularly review the system to ensure that it continues to provide suitable and sufficient safety systems and procedures for employees that reflect our business activities.

- The Safety Advisor has the following responsibilities:

- To ensure that the performance of health and safety is managed, through reviews and audits which are reported effectively to the Directors;

- To ensure that all accident reports and other feedback information are analysed to identify trends and opportunities for improvement.

**Further Information** [www.hse.gov.uk/managing/health.htm](http://www.hse.gov.uk/managing/health.htm)  
[www.hse.gov.uk/pubns/books/hsg65.htm](http://www.hse.gov.uk/pubns/books/hsg65.htm)



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**E-Policy Review:**

The effectiveness of this policy and associated arrangements will be reviewed annually under the direct supervision of the Director of Operations.

Adoption Date	Updated	Review Date	Director
10/2018	1/8/2022	1/8/2023	

**ELA TRAINING SERVICES's Prevent Policy**

Adoption Date	Updated	Review Date	Director
10/2018	1/8/2022	1/8/2023	

**What is Prevent**

- The national Prevent strategy is designed to reduce the number of serious incidents and to catch anyone especially vulnerable people before they enter the criminal justice system.

**Meeting our Prevent Duties and Tackling Extremism**

- ELA Training Services understands its responsibilities under the Counter Terrorism & Security Act 2015 to prevent people of all ages being radicalized or drawn into terrorism and seeks to meet its obligations in the ways shown below.

**Context**

- ELA Training Services trains learners of ages 16 and above, all year from around the world.

- ELA Training Services promotes a multi-cultural environment where respect for and tolerance of other beliefs is required.

- ELA Training Service's head office is located in one of the boroughs of a multi-cultural city and places trainers/assessors with learners and employers in cities, towns and villages all over the UK.

**Prevent Lead**

- Responsibility for ensuring Prevent Duty lies with Ali Khan, Director and Designated Safeguarding Lead for the Prevent Strategy.

## Risk Assessment and Procedures

- A risk assessment has been produced by the ELA Training Services Lead Contact for the Prevent Strategy and held in the ELA Training Services; it will be reviewed and updated annually.
- The ELA Training Services Lead Contact for the Prevent Strategy has received training in Prevent policy and risk.
- All members of the ELA Training Services team at head office will undertake Prevent online training.
- All trainers/assessors will receive Prevent guidance from ELA Training Services and will undertake online Prevent training.
- ELA Training Services will make and maintain contact with the local police/local authority Prevent coordinator in all areas where we have young people to understand their role, the support available, (e.g.via the Channel process) and a list of contacts for referrals.

ELA Training Services will counteract risks by:

Promoting a safe and supportive environment via clear expectations of accepted behaviours and those including radicalization and extremism, not being tolerated.

Promoting the core British values:

- Democracy
- The rule of law
- Individual liberty
- Respectful and Tolerance of different faiths or beliefs, through documents given to learners (learner handbook), via information on enrolment on British culture and traditions.
- Where possible, developing critical awareness and thought to counter accepting extremism without question, especially of online material.
- Challenging radical or extremist views in any context (formal or informal) via stated procedures. In most situations this would require an immediate response re the tolerance expected then reporting concerns.





- Being ready to react when world or local events (e.g. Westminster, London Bridge, Paris attacks) cause upset and the likelihood of conflicting feelings being expressed. Prevent lead to take initiative in these situations.
- Asking trainers/assessors to have strong filters on the Internet and clear rules on accessing extremist/terrorist websites/uses of social networks to exchange extremist/terrorist views.
- Trainers/assessors getting to know learners and their circumstances making it easier to spot changes in behaviour.
- ELA Training Services staff and trainers/assessors being observant and vigilant in noticing any signs of radical or extremist behaviour.
- ELA Training Services staff and trainers/assessors supporting any young people identified as vulnerable.
- ELA Training Services staff and trainers/assessors themselves not supporting or funding and extremist organisations.
- ELA Training Services staff and trainers/assessors exemplifying the core British values by:
  - Ensuring an unbiased, non-partisan, non-discriminatory and ethical learning environment
  - Being democratic and creating opportunities for democratic processes,
  - Following the rule of law and compliance bodies advice
  - Creating opportunities for learner voice and opinion to be communicated
  - Exemplifying respect and tolerance for all faiths and beliefs

### Understanding the risk of extremism

- Staff, learners, young people and trainers/assessors may come into contact with ELA Training Services already holding extremist views. They may be influenced by a range of factors: global events peer pressure, media family views, extremist materials (hard copy or online), inspirational speakers, friends or relatives being harmed, social networks, and more.



- People who are vulnerable are more likely to be influenced.
- Their vulnerability could stem from a range of causes including: loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crises, victim of hate crime or discrimination and bereavement.

### What is the ELA Training Services doing to prevent radicalisation?

- Prevent Duty training is delivered on induction. A certificate is issued on successful completion of the course which is assessed by a test.
- ELA Training Services trainers and assessors engage the following resources:
  - **Digital Disruption**— This organisation provides chargeable and free resources targeted especially at increasing digital literacy – at how young people use the internet, and critique and challenge information they find on it.
  - **Learning Together to Be Safe**— Prepared by the Department for Children, Schools and Families (now Department for Education), this 2008 toolkit to help schools contribute to the prevention of violent extremism was brought out after the first iteration of the Prevent agenda. Although the policy it refers to has been updated, some of its content may still be of use to schools.
  - **My Country My Vote**— This project does not seek to tackle issues of extremism directly. However, research has shown that one effective long-term approach to preventing extremism is to engage young people in participatory democracy. This project aims to do just that, and may therefore be a useful model to follow.
  - **Prevent Duty Guidance**- For England and Wales – Produced by the UK Government, this is the official guidance document.
  - **Prevent for School**— This resource was set up following demand from schools in Lancashire, UK. It has been updated to reflect the latest duties (2015), and has links to resources and tools for schools (both primary and secondary).
  - **Resilience**— This project is run by the Religious Education Council of England and Wales, and aims to help RE teachers who want to develop their confidence and competence in dealing with contentious issues in the classroom, particularly those linked to violent extremism.



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- **Rewind**– The Rewind project has tackled racism in an area of the West Midlands with a long history of support for far-right views. It has courses available for interested schools. A now-dated review of their services can be found on the Institute for Race Relations website.
- **Safeguarding in Schools**– This consultancy is run by a former headteacher who specialises in providing courses and resources on safeguarding to school staff and headteachers, including on tackling extremism.
- **Think Project**– Running for three years up to March 2015, the Think Project worked with disengaged young white people in Wales. It is unusual in having evaluation built in from the start. The results of this evaluation were discussed in this peer-reviewed article.
- **Victvs**– This consultancy provides training and resources for staff as well as parents on understanding the new Prevent duties as well as the risks from extremism and radicalisation
- Follow the ELA Training Services’ Reporting Protocol below if you have any concerns about radicalisation, Extremism or Terrorism relating to any stakeholders. If you feel the need to contact the Hounslow PREVENT team directly for further information, any queries or concerns, the Hounslow Prevent team are: Joan Conlon on [joan.conlon@hounslow.gov.uk](mailto:joan.conlon@hounslow.gov.uk) (Mobile: 078 1707 9190), Najeeb Ahmed on [Najeeb.Ahmed@hounslow.gov.uk](mailto:Najeeb.Ahmed@hounslow.gov.uk) (Mobile: 078 9054 0433) or Karmjit Rekhi on [Karmjit.Rekhi@hounslow.gov.uk](mailto:Karmjit.Rekhi@hounslow.gov.uk) (Mobile: 079 7672 1119)



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## ELA Training Services' Records of Concern Reporting Protocol

- Disclosures and Records of Concern Reporting Protocol. This protocol is used in conjunction with the "5 Steps to Handling Disclosures and Records of Concern V 5.0 1/08/2022" poster that is included in your pack. Contact your line manager immediately if you do not have access to this. Do not engage in any ELA Training Services work until you are confident in this procedure.
- Within 1 hour or immediately (if possible) of any Disclosure and/or Concern, email a short message about the Disclosure and/or Concern to [safe@ela-training.co.uk](mailto:safe@ela-training.co.uk). An investigating officer should respond within an hour. If not, contact Ali Khan, the Director of ELA Training Services on +44 (0) 7832328587, or contact one of the Deputy Designated Safeguarding Leads Sandra Chatwood on +44 (0) 7483318425.
- Within 24 hours of any Disclosure and/or Concern, those involved must complete the correct form (<https://forms.gle/sgqCGowBtEjWaxmc7>). An investigating officer should respond within 24 hours. If not, contact Ali Khan, the Designated Safeguarding Lead at +44 (0) 7832328587, or contact one of the Deputy Designated Safeguarding Leads Sandra Chatwood on +44 (0) 7483318425.
- Be clear as to the persons involved. These reports must be understood by neutral external stakeholders. Therefore, you should list the full names of persons and their role at the beginning of the incident report and assign initials to them. For example, Fred Bloggs, staff (FBI), John Smith, pupil (JSm) etc. You can then use their initials in the body of the incident report. Initials allow us to impart a degree of confidentiality.
- Save a copy of the report securely for your professional records.

**If any form of Restraint or Physical Intervention is used during the accident, incident or near miss then staff must clearly state the manner and duration of the restraint and the training/rationale that they had to apply the restraint.**



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## NOTES:

- Do not use emotive language eg: “stormed out of a room”. It is more professional and unprejudiced to say “left the room running and slammed the door after them”
- Do not use any opinion – stick to the facts of the event.
- If any First Aid is administered, details of this must be included in the form

## Follow our Safeguarding Policy Guidelines (What to do if a person makes a disclosure)

- ELA Training Services is committed to ensuring that it meets its responsibilities by treating any allegation seriously and sensitively. Records of Concern and Incident Reports must be used as detailed in their protocols.
- Follow the Safeguarding 5 Step Flowchart to support your response.
- Stay calm.
- Listen to what the young person/vulnerable adult is actually saying.
- Reassure them that they have done the right thing by telling you.
- Do not promise the young person/vulnerable adult that this can be kept secret, as subsequent disclosure could then lead to the young person/vulnerable adult feeling betrayed. Explain that you are obliged to inform other people.
- Reassure the young person/vulnerable adult that the people who will be informed will be sensitive to their needs and will be looking to help protect them. Inform them that it is not in their interests to keep the disclosure confidential, and it will have to be passed on to the appropriate agencies.
- Make a note of any conversations with the young person/vulnerable adult, trying to make these as detailed as possible, including when and where the conversations took place. Draw a diagram, if appropriate, to show the position of any bruises or marks the young person/vulnerable adult you observe, trying to indicate the size, shape and colour.



- Record as soon as possible and use the actual words used by the young person/vulnerable adult.
- Keep all records factual. Be aware of not making assumptions or interpretations of what the young person/vulnerable adult is telling you. Store all records securely.
- Do not interrogate the young person/vulnerable adult, or push for more information. Ensure that any questions asked are open, not leading closed questions. Do not ask the young person/vulnerable adult to repeat what they have told you, for another person. Record accurately.
- Discuss your concerns with the ELA Training Services DSL
- Who will report this information to an appropriate agency (the Designated Officer previously called the Local Authority Designated Officer-LADO).
- The person to whom the disclosure was made should ensure that the young person/vulnerable adult who has disclosed the information is informed about what will happen next, so they can be reassured about what to expect.
- You may report your concerns directly to your local LADO if you are not satisfied with the response from ELA Training Services. You will find contact details for your local Social Care Referral and Assessment Team online. The details will be on your Local Council website.

**NOTE : Do not engage in any ELA Training Services work until you are confident in this procedure.**

- Do not use any opinion – stick to the facts of the event.
- If any First Aid is administered, details of this must be included in the form.
- If this incident includes a disclosure or cause for concern, follow our Safeguarding Policy Guidelines or the “5 Steps to Handling Disclosures and Records of Concern V5.0 1/8/2022” poster that is included in your pack. Contact your line manager immediately if you do not have access to this.
- Do not engage in any ELA Education Group work until you are confident in this procedure.



## ELA Training Services' Incident, Near Miss Accident Reporting Protocol

### Incident, Near Miss or Accident Reporting Protocol

- Within 1 hour or immediately (if possible) of any accident, incident or near miss, an email a short message about the must be emailed to [safe@ela-training.co.uk](mailto:safe@ela-training.co.uk). An investigating officer should respond within an hour. If not, contact Ali Khan, the Designated Safeguarding Lead Director at ELA Training Services at +44 (0) 7832328587.
- Within 24 (working) hours of any accident, incident or near miss, those involved must complete the correct form (<https://forms.gle/sgqCGowBtEjWaxmc7>) and email it to [safe@ela-training.co.uk](mailto:safe@ela-training.co.uk). An investigating officer should respond within 24 hours. If not, contact Ali Khan, the Designated Safeguarding Lead Director at ELA Training Services at +44 (0) 7832328587.
- Be clear as to the persons involved. These reports must be understood by neutral external stakeholders. Therefore, you should list the full names of persons and their role at the beginning of the incident report and assign initials to them. For example, Fred Bloggs, staff (FBI), John Smith, learner (JSm) etc. You can then use their initials in the body of the incident report. Initials allow us to impart a degree of confidentiality.
- Save a copy of the report securely for your professional records.

**If any form of Restraint or Physical Intervention is used during the accident, incident or near miss then staff must clearly state the manner and duration of the restraint and the training/rationale that they had to apply the restraint.**

### NOTES:

- Do not use emotive language eg: “stormed out of a room”. It is more professional and unprejudiced to say “left the room running and slammed the door after them”.
- Do not use any opinion – stick to the facts of the event.
- If any First Aid is administered, details of this must be included in the form.



- If this incident includes a disclosure or cause for concern, follow our Safeguarding Policy Guidelines or the “5 Steps to Handling Disclosures and Records of Concern V5.0 1/8/2022” poster that is included in your pack. Contact your line manager immediately if you do not have access to this.
- Do not engage in any ELA Training Services work until you are confident in this procedure

## ELA Training Services’ Reporting Form

- You can locate the form here:



<https://forms.gle/sgqCGowBtEjWaxmc7>

- Acceptable Behaviour promotes Safeguarding
- Our objective is to create a workplace which is free from harassment and bullying and to ensure that all employees are treated with dignity and respect.
- Everyone is responsible for promoting this objective and complying with this procedure. It is important to recognise that conduct which one person may find acceptable, another may find totally unacceptable. This includes when you are at work on training courses or on Company social events.
- Managers have particular responsibility for creating and respecting a considerate culture within their area (both in the workplace or at work-related events outside of the workplace) and for utilising the support available to ensure that informal and formal complaints are dealt with sensitively, appropriately and in line with the procedures set out in this policy.



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- The Company’s Position on Bullying and Harassment
- All employees have a duty not to bully or harass each other nor to help anyone else to do so.
- We will not tolerate bullying or harassment in our workplace or at work-related events outside of the workplace, whatever the seniority of the perpetrator and whether the conduct is a one-off act or repeated course of conduct, and whether done purposefully or not. Neither will we tolerate retaliation against, or victimisation of, any person involved in the bringing of a complaint of harassment or bullying. You should also be aware that if a court or tribunal finds that you have bullied or harassed someone you could be liable to compensate the victim. In some circumstances the treatment may amount to a crime punishable by a fine or imprisonment.
- We will take appropriate action if any of our employees are bullied or harassed by our customers or suppliers.
- Allegations of bullying and harassment will be treated seriously. Investigations will be carried out promptly, sensitively and, as far as possible, confidentially.

## Review

The effectiveness of this policy and associated arrangements will be reviewed annually under the direct supervision of the Director of Operations.

Adoption Date	Updated	Review Date	Director
10/2018	1/8/2022	1/8/2023	

