



Brighter Horizons
Training and Development
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Safeguarding

Safeguarding learners, children, and young people. Vulnerable adult's protection policy.

Introduction:

Brighter Horizons Training and Development is fully committed to promoting children's, young people's, and adults' (including vulnerable adults) rights, notably their right to be protected from harm, abuse, radicalisation, and exploitation and to be involved in any decisions that directly affect them. Brighter Horizons Training aims to ensure that all children, young people, and adults are protected and kept safe from harm while they are with staff in this organisation in line with the Children Act 1989 and the Children Act 2004. This applies to staff we employ, delegates and apprentices we support through courses/programmes AND those who we may come into contact with through such training programmes (for example apprentices on placements).

We also comply with the Government's policy on Safeguarding vulnerable adults from abuse or other types of exploitation, whilst supporting individuals in maintaining control over their lives and in making informed choices without coercion.

We also comply with Keeping Children Safe in Education policy, the statutory guidance for schools and colleges (2014).

In order to achieve this Brighter Horizons will:

- Establish and maintain an environment where young people and vulnerable adults feel secure, are encouraged to talk, and are listened to
- Ensure that young people and vulnerable adults are supervised during their time on Brighter Horizons' premises
- Establish a safe environment in which young people and vulnerable adults can learn and develop
- Promote the policy through for example mandatory induction programmes, policy implementation, training and presentations
- Support young people and vulnerable adults in accordance with their agreed protection plan.

Recruitment of staff:

Brighter Horizons will:

- Ensure that all staff involved in recruitment, training, and supervision, are aware of this policy and have received appropriate training and support to ensure its full implementation, and are kept up to date with legislation changes
- Ensure all staff receive safeguarding training as part of induction, as committed through this policy
- Ensure our staff are carefully selected, screened, trained and supervised, practicing safer recruitment in checking the suitability of staff to work with children, young people and vulnerable adults

- Ensure that all successful applicants appointed into positions dealing with children, young people or vulnerable adults will be DBS checked at enhanced level with a requirement that all DBS checks will be clear. Should information be received regarding a potential or actual member of staff's suitability to work with children, young people or adults, legislation will denote whether their employment can commence or not, however if there is any doubt the LADO will be consulted.
- Ensure that employers we engage with regards to apprenticeships sign our commitment statement which includes a statement about their safeguarding practice.

Training:

Successful applicants joining our company will receive induction training, which will give an overview of the organisation and ensure they know its purpose, values, services and structure. Relevant training and support will be provided on an ongoing basis and will cover information about their role, and opportunities for practicing skills needed for work. Training on specific areas such as health and safety procedures, identifying and reporting safeguarding issues, and confidentiality is mandatory and will be given as a priority to all new staff and volunteers and will be regularly reviewed. CPD sessions will be communicated to staff to raise awareness and communicate up to date legislation and a standing agenda item in team meetings will continue to ensure the company's commitment to safeguarding understood and the policy adhered to.

Staff supervision:

All staff will have a designated supervisor and/or manager who will provide regular feedback and support. Every member of staff will attend at least two formal staff reviews each year where their performance, skills, motivation, and expectations will be discussed. The reviews will be recorded, and copies made available to the member of staff.

Designated safeguarding lead:

Brighter Horizons Training will:

- Ensure we have a **designated person responsible for the protection of children, young people, and vulnerable adults** and who has received appropriate training and support for this role – This person is Antonia Ogden-Meade, Director.
- Ensure that the designated children, young people and vulnerable adults protection person understands their responsibility to refer any child, young person or vulnerable adult with protection concerns to the statutory agencies (i.e., police and/or social work).
- Ensure children, young people and vulnerable adults know who the designated person for children, young people and vulnerable adult's protection is and that there are adults in the centre whom they can approach if they are worried; and
- Ensure every member of staff, including temporary and contracted staff, knows the name of the designated person responsible for children, young people and vulnerable adult's protection and the role of the designated person.

Obligations:

Brighter Horizons Training will:

- Raise awareness of all staff regarding protection issues and equipping young people and vulnerable adults with the skills needed to keep them safe through training, induction, appraisals, and dissemination of information through social media.
- Raise awareness of the procedures for identifying and reporting cases, or suspected cases, of any safeguarding issues and have this as a standing agenda item for monthly staff meetings.
- Ensure that all staff understand their responsibilities in being alert to the signs of any safeguarding issues and responsibility for referring any concerns to the designated person responsible for children, young people and vulnerable adults – this includes the management of concerns relating to apprentices.
- Ensure staff are able to link this policy with associated policies including policies on prevent, behaviour and conduct, recruitment and retention, social media etc.
- Make all staff aware of the procedures to follow where an allegation is made against a member of staff or person associated to the company.
- Make all staff aware of the procedures to follow where an allegation is made by an apprentice in relation to people outside of the company (for example within their family or social network);
- Ensure that all staff and associates understand their legal and moral obligations to protect children, young people, and vulnerable adults, in regard to safeguarding
- Ensure that all staff and associates understand their responsibility to work to the standards and procedures detailed in the organisation's Safeguarding Policy.
- Ensure that all staff understand their obligations to report care or protection concerns about a staff member or subcontractor's conduct towards a child, young person, or vulnerable adult to the organisation's designated person for safeguarding.
- Ensure that all procedures relating to the conduct of staff are implemented in a consistent and equitable manner.
- Provide opportunities for all staff (paid and unpaid) to develop their skills and knowledge particularly in relation to the care and protection of children, young people, and vulnerable adults; and
- Ensure that staff and associates endeavour to keep up to date with national developments relating to the care and protection of children, young people, and vulnerable adults

Procedures for responding to concerns about safeguarding:

The following notice is displayed in the training centre and included in all inductions:

If you are concerned and see or suspect a safeguarding issue of a child, young person or vulnerable adult whilst working with, attending training with or completing an apprenticeship with Brighter Horizons please alert our lead trainer/assessor Michele Budgen, Head of Training and Development immediately. She, with the support of Brighter Horizons lead for safeguarding Antonia Ogden-Meade, Director will investigate the concerns fully, ensure

correct documentation is completed and concerns are reported to the correct authority. **Michele Budgen can be contacted on 07787 516242** or if she is not available, **Antonia Ogden-Meade can be contacted on 07980 586622.**

Disclosure / confidentiality:

If a child / young person / vulnerable adult confides that a safeguarding issue has taken place staff are advised to remain calm and in control but not to delay taking action. Staff must listen carefully to what has been said. Allow the child / young person / vulnerable adult to speak at their own pace and ask questions only for clarification. In keeping with the company's training and with related guidance, staff **should not:**

- Ask questions that suggest a particular answer
- Promise to keep it a secret
- Ask leading questions

Staff **should** ensure that:

- The disclosure is recorded fully
- That the disclosure is made entirely in the person's own words (the words of the disclosing party)
- The relevant staff members or agencies are informed. Michele Budgen and/Antonia Ogden-Meade must ALWAYS be involved in action planning and decision making where any concerns or disclosures are received.

Staff should then reassure the child / young person / vulnerable adult that 'they did the right thing' in telling someone and explain what will happen next making it clear that the information will need to be shared with other professionals (only those essential to the process) to make sure the issue is dealt with accordingly.

At the first opportunity available, staff should share the information with the senior safeguarding person, Michele Budgen who will liaise directly with the company's designated safeguarding lead Antonia Ogden-Meade who will need to liaise with the relevant authorities (including for example the local authority, LADO, social services, or the police, if applicable).

Any information disclosed from the child / young person / vulnerable adult is to be treated as confidential and only to be shared with the member of staff's line manager and the safeguarding officer (Michele Budgen) or company's designated safeguarding officer (Antonia Ogden-Meade). It is important to note that many of the apprentices supported by the company are under 18 years of age and qualify as 'young people' for the sake of this policy.

Managing sensitive information:

As soon as possible after the disclosing conversation, staff must make a note of what was said, using the child / young person / vulnerable adult's own words and their response. The date, time, any names that were involved or mentioned, who this information was passed on to, should be noted and the record signed and dated.

If a serious allegation is made against any member of the Company, that individual will be suspended immediately until the investigation is concluded. The individual will be excluded from any Brighter Horizon's premises and the LADO/other agencies notified accordingly.

In all situations, including those in which the cause of concern arises from a disclosure made in confidence, the details of an allegation, or reported incident, will be recorded, and held on file, regardless of whether or not the concerns have been shared with a statutory protection agency.

An accurate note shall be made of the date and time of the incident or disclosure, the parties involved, what was said or done and by whom, any action taken to investigate the matter, any further action taken

Any records will be stored securely and shared only with those who need to know about the incident or allegation.

Rights and confidentiality:

If a complaint is made against a member of the Company, they will be made aware of their rights under Brighter Horizon's disciplinary procedures.

Both the alleged parties and the child / young person / vulnerable adult who is thought to have been involved in a safeguarding issue, have the right to confidentiality under the General Data Protection Regulation 2018 and any possible criminal investigation could be compromised through inappropriate information being released.

IT usage:

All staff and learners working with Brighter Horizons are required to adhere to the company's policy on IT usage, access, and the storage of information. IT access is for professional usage only and the social media policy and staff handbook specify how usage is restricted and monitored. Inappropriate use of the IT system (hard and software) will result in disciplinary action for staff or a breach in contract for learners which may result in termination of their programme. Issues which constitute a safeguarding concern should be reported immediately to the Designated Safeguarding Lead (Antonia Ogden-Meade).

Inappropriate material:

In the event that a member of staff becomes aware of inappropriate material on display whilst visiting other sites, they will be required to report it to the Head of Training and Development (Michele Budgen) or Designated Safeguarding Lead (Antonia Ogden-Meade) who can then investigate.

Depending on the nature of the inappropriate material, referral to another agency maybe appropriate but at the least, they will the raise the issue with the employer and record the outcome. Should this present any onward safeguarding concerns, the company's designated safeguarding officer will take appropriate action with the support of appropriate agencies (which may include Ofsted, Police, Local Authority/LADO, ESFA etc).

Disclosing criminal convictions:

If a member of staff discloses a criminal conviction, this will be discussed with the designated safeguarding officer, as outlined in this policy. The Designated Safeguarding Officer will work with external agencies where appropriate to ascertain whether staff are suitable to work with children, young people, or vulnerable adults.

If a learner, who may be commencing training with Brighter Horizons discloses any criminal convictions that may have an impact on safeguarding other learners or children who they may come into contact with during their programme, this information will need to be discussed with the designated safeguarding person, as soon as possible. In some instances, the learner may be unable to join the programme until a further investigation can be undertaken, or until a suitable waiver has been received from Ofsted. Legislative requirements regarding suitability will always be followed and are discussed at initial meetings with employers and potential apprentice candidates. After investigation, the designated safeguarding person will contact the learner to communicate the outcome of the investigation. If a learner is recruited for a specific job opportunity, the prospective employer will be the final decision maker.

Lone working/home working:

Where the conditions of service delivery or its associated tasks require staff to work alone, both the individual staff member and management have a duty to assess and reduce the risks which lone working presents. Please refer to the lone working policy for more details.

'Lone working' refers to situations where staff in the course of their duties work alone in the community, in the homes of individuals or in their own home or may be the only staff member present in an office or other establishment's outside of Brighter Horizons' premises.

Risk assessments must be conducted prior to working alone, where all risks are assessed by:

- The Environment
- The nature of the task
- The individuals concerned
- History - any previous incidents in a similar situation and,
- Any other special circumstance's

Where there is any reasonable doubt about the safety of a lone worker in a given situation, consideration should be given to sending a second worker or making other arrangements to complete the task.

Staff should be fully briefed in relation to risk as well as the task itself. Plans for responding to individual service users who present a known risk should be regularly reviewed and discussed with the staff team. Checking-in and fall-back arrangements must be in place and a device, such as a mobile phone, should be provided to do so. The management is responsible for agreeing and facilitating these arrangements, which should be tailored to the operating conditions affecting the team.

Staff working from their own homes should take every reasonable precaution to ensure that their address and telephone number remain confidential. There should be regular contact with their line manager or another designated person if working at home for extended periods, and an appropriate reporting-in system should be used if making visits from home. Should an incident occur, the designated contact person should be informed, and the incident reporting procedure should be followed.

The prevent duty:

The National Prevent Strategy is part of the Government's counter terrorism strategy. It addresses all forms of terrorism and is designed to tackle the problem at its roots, preventing people from supporting or becoming involved in terrorism.

Prevent has three clear objectives:

- Challenging the ideology that supports terrorism and those who promote it.
- Protecting vulnerable individuals to prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
- Supporting sectors and institutions where there are risks of radicalisation

Brighter Horizons has a responsibility to safeguard our employees and protect apprentices against all forms of harm, including being drawn into terrorism. Staff will ensure that they are mindful of changes in behaviour that could indicate if any young person or vulnerable adult and their family are involved or being influenced in radicalisation.

While it remains extremely rare for people to become involved in terrorist activity, there is a risk that young people can be exposed to extremist influence or prejudiced views at an early age.

The training centre has a duty to help others understand the Prevent Strategy and recognise if someone may be involved or is supporting terrorism and help them to take action and choose a different path for their lives. Staff will act responsively to ensure the safety of all young people and vulnerable adults is paramount and to report any concerns immediately to the Designated Safeguarding Lead.

Signs of vulnerability may include:

Loneliness or isolation

Changes to a family situation/family tensions

Poverty

Political grievances

Crime/anti-social behaviour

Possible warning signs may include:

Progressive changes in behaviour - such as significantly changing appearance, changing peer/friendship groups

Argumentative and unwilling to listen

Unwilling to engage with those of different race, religion, gender etc

Accessing extremist material, showing sympathy to extremist views or behaviour

Reporting Concerns:

If you are worried or concerned about someone such as a colleague or an apprentice, please contact our Safeguarding Team immediately on 07980 586622.

Whistleblowing

The Legislation

Whistleblowing legislation was introduced under the Public Interest Disclosure Act 1998 ("the Act") to encourage employees to come forward with disclosures of criminal behaviour or malpractice, without fear of reprisal or dismissal.

Within the Act:

The categories of malpractice are extremely wide and include:

- Criminal offences
- Miscarriages of justice.
- Danger to the health & safety of any individual
- Damage to the environment
- Breach of any legal obligation
- Deliberate concealing of information about any of the above.

It is important to Brighter Horizons that any fraud, misconduct or wrongdoing by employees or people engaged in the organisation's business, is reported, and properly dealt with. The Company, therefore, encourages all individuals to raise any concerns that they may have about the conduct of others in the Company or the way in which the business is run.

Brighter Horizons recognises that honest and effective communication is essential if malpractice is to be dealt with effectively and the organisations success is ensured.

Whistleblowing relates to all those who work within or with the Business who may from time to time think that they need to confidentially raise with someone, certain issues relating to the organisation or individuals.

Whistleblowing is separate to the complaint procedure, however initially the following communication should be followed:

- Report any concerns to the Head of Training and Apprenticeships (Michele Budgen 07787 516242). If this is not possible then it should be reported to Company Executive (Antonia Ogden-Meade 07980 586622) at any time.
- Should any further advice or are unsure if the Public Interest Disclosure Act will protect you, you can contact Public Concern at Work on 020 74046609.
- **For any matters that are in relation to qualifications and examinations should be reported to OFQual, Office of Qualifications and Examinations Regulation:**

Whistleblowing and malpractice
Complaints investigation Manager
Ofqual
Earlsdon Park
53-55 Butts Road
Coventry CV1 3BH

Tel: 0300 303 3344

Email: whistleblowing@ofqual.gov.uk

Online form: www.smartsurvey.co.uk/s/ofqual-whistleblowing/

- **For any matters relating to a post-16 education or a training provider this should reported to**

ESFA:

Customer Service Team
Education and Skills Funding Agency
Cheylesmore House
Quinton Road
Coventry
CV1 2WT

Email: complaints.esfa@education.gov.uk

Equal Opportunities

Equality, Diversity, and Inclusivity Policy

Brighter Horizons Training is committed to eliminating discrimination and encouraging diversity amongst our workforce and learner community. Our aim is that our workforce will be truly representative of all sections of society and each employee feels respected and able to give of their best. This extends to ensure that all opportunities available for apprenticeships follow the same policy.

To that end the purpose of this policy is to provide equality and fairness for all in our company and not to discriminate because of race, colour, nationality, ethnic or national origin, sex, marriage and civil partnership, gender reassignment, pregnancy and maternity, sexual orientation, religion or belief, disability, or age.

The company opposes all forms of unlawful and unfair discrimination.

All employees, whether part-time, full-time, or temporary, volunteers, students and apprentices will be treated fairly and with respect. Selection for employment, promotion, training, or any other benefit, will be on the basis of aptitude and ability. All personnel will be helped and encouraged to develop their full potential and the talents and resources of the workforce will be fully utilised to maximise the efficiency of the organisation.

This commitment will be achieved by the following – Brighter Horizons will:

- Create an environment in which individual differences and the contribution of all our staff and learners are recognised and valued
- Ensure that every member of our team is aware that they are entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated by staff, learners, or those whom we come into contact with. Any concerns should be reported following our policies on whistleblowing, bullying and harassment.
- Ensure that all staff know that training, development, and progression opportunities are available to all within the local community. A range of media are used to ensure we are reaching out to all in our community (Facebook, website, Twitter, Instagram, apprentice fairs, sixth form presentations, careers fairs, banners, sponsored events, drop-in sessions etc)
- Make reasonable adjustments for all staff and learners and develop their educational opportunities, constantly looking to develop everyone to their potential
- Ensure that the team understands as part of our company's foundation that equality in the workplace is good management practice and makes sound business sense – this policy links with our recruitment and retention related policies which are reviewed annually to ensure we are delivering according to our commitment. These policies for example ensure adverts for opportunities are open to all and are non-discriminatory. Employers who work with us to recruit apprentices are required to demonstrate their alignment to this policy by signing our commitment statement

- Inspire participants to become active citizens and promote economic wellbeing for all participants including those affected by educational, economic, and social disadvantage and those from all social and cultural backgrounds resulting in a positive experience for all

This policy will be promoted through recruitment practice, policy development across the business, designated director level commitment to full implementation and robust review, direct training at induction sessions with all learners and new staff, through our website and will be reviewed and evaluated through qualitative and quantitative analysis

The policy is fully supported by senior management

The policy is monitored and reviewed annually. An annual questionnaire to all staff and learners will be used to evaluate the delivery and efficacy of this policy and the results used to inform and develop practice

Contravention of this policy

Failure to comply with any of the requirements of this policy by Brighter Horizons staff is a disciplinary offence and may result in disciplinary action being taken under Brighter Horizons disciplinary procedure.

Supporting Learners with Difficulties

At Brighter Horizons Training, we are committed to aiding our learners who might be in certain difficulties. We operate a policy in which we set out the different ways we aim to support young people in difficulties here. All conversations and disclosures made to members of staff regarding these issues should be kept in the strictest confidence.

Learner difficulties

We offer comprehensive support to learners in difficulties. We may signpost learners to relevant information and services where appropriate. We offer one-to-one support and guidance. We may make reasonable adjustments to their training or we could offer a break in learning.

Difficulties are assessed on a case-by-case basis by the Director Antonia Ogden-Meade and/or the Head of Training and Development Michele Budgen.

Below is a non-exhaustive list of difficulties that we may consider for reasonable adjustments to training or for a break in learning.

- Long term illness (including physical and mental health conditions)
- Bereavement relating to immediate family or carers
- Social difficulties (including serious home-life troubles)
- Maternity
- Or other issues not listed that are assessed on a case-by-case basis

Correct reporting

If a learner or young person wishes for a reasonable adjustment to be considered on the grounds of difficulties, they are facing these should be reported to the Director Antonia Ogden Meade or Head of Training and Development Michele Budgen. All requests and discussions relating to difficulties must be had directly with either one of these two members of staff in order for any adjustments to be authorised. If you receive a disclosure of this nature, please ensure you report this in a timely manner.

Reasonable adjustments

Learners may also have to seek reasonable adjustments from their employer if they require these from work.

Reasonable adjustments for training may include (but are not limited to):

- Extended exam times
- Scribes
- Accessibility for disabled persons
- Use of equipment for the visually impaired
- Compressed hours

- Changes in the delivery method of training
- Alternate assessment methods.

These adjustments are subject to approval by the relevant awarding bodies.

Break in Learning

Under certain circumstances serious difficulties may indicate that a break in learning should be taken. These will always be authorised by the Head of Training and Development Michele Budgen. A break in learning can be for a maximum of 9 months. Review dates should be agreed in order to reassess the learners' difficulties. This is to ensure that Brighter Horizons Training are kept up to date regarding learner's progress. Review dates are agreed by the Head of Training and Development Michele Budgen and these should be given on a case-by-case basis.

Making a complaint

At Brighter Horizons Training we aim to provide the highest standards of teaching, learning and development for our students. To this end we are regularly inspected by a number of accredited bodies to ensure we are providing the highest level of service we can. However, there may be occasions when it may be appropriate to make a complaint, not only in cases when there may be an issue that needs investigating but also when there is feedback to be given against a member of staff or associated provider either positive or negative. We appreciate all client feedback, whether that is from an employer, employee, apprentice or a client and we will take all feedback seriously and take any appropriate actions.

The purpose of this policy is to:

- Ensure there is a clear policy and procedure for complaints
- Maintain positive relationships with apprentices, clients, employees, and employers through a clear and concise feedback system
- Ensure that clients and employers are aware of our policies and procedures surrounding complaints
- Ensure that all actions related to complaints are followed through to satisfaction of the complaining party
- Ensure that there is a robust system for complaining parties to escalate a complaint if they feel it has not been dealt with effectively
- Ensure that adequate records are kept relating to complaints and the 'lessons learnt' system is effective

Aim

This policy applies to all staff members, including individuals employed either full or part time, on a temporary basis, volunteers, and apprentices. All managers and senior staff are expected to ensure that all employees are aware of this policy and understand its scope. Managers should also make it clear that all employees, teammates, senior management, and directors have a responsibility to each other. The policy also aims to include information on the proper procedure for dealing with a complaint.

Responsibilities

Directors / Senior Team / Trainers

The directors, senior team and teachers have a direct responsibility for ensuring complaints are dealt with in a timely and efficient manner to the extent that the complaining party feels the complaint has been dealt with in a satisfactory manner.

The directors, senior team and teachers should (duties are listed in a non-exhaustive list):

- Review (at least annually), adhere to and monitor the policy for the correct reporting of complaints
- Ensure adequate records of complaints are maintained

- Report any complaints directly to appropriate parties (detailed later in the document but including the ESFA and Ofsted where appropriate for example)
- Ensure that any conversations with any complaining parties are recorded effectively; if necessary, a written complaint should be sought
- Ensure that good feedback between the complaining parties and Brighter Horizons continues
- If dealing with the complaint directly, a list should be compiled of appropriate actions to be carried out in a timely manner
- If appropriate, conduct a full investigation speaking to all parties involved
- Make updates to policies and procedures, where appropriate
- List 'lessons learnt' from the complaint to inform better practice
- Compose a response letter detailing all completed actions
- If appropriate, compose an interim letter detailing which actions have been completed and which ones require further actions. This step is only required if there is a reasonable delay in proceedings (for example in cases of staff absence)
- **All complaints are to be acknowledged within 48 hours (working hours) of being received and a full response or interim response with clear actions and timescales provided to the complainant within 10 working days.**

Trainers/Assessors and other employees of Brighter Horizons Training

All other members of staff have a responsibility to ensure that any complaints that they have received are dealt with in a manner suitable to the complaint. Correct reporting and communication should be adhered to at all times.

All trainers/assessors and other employees should:

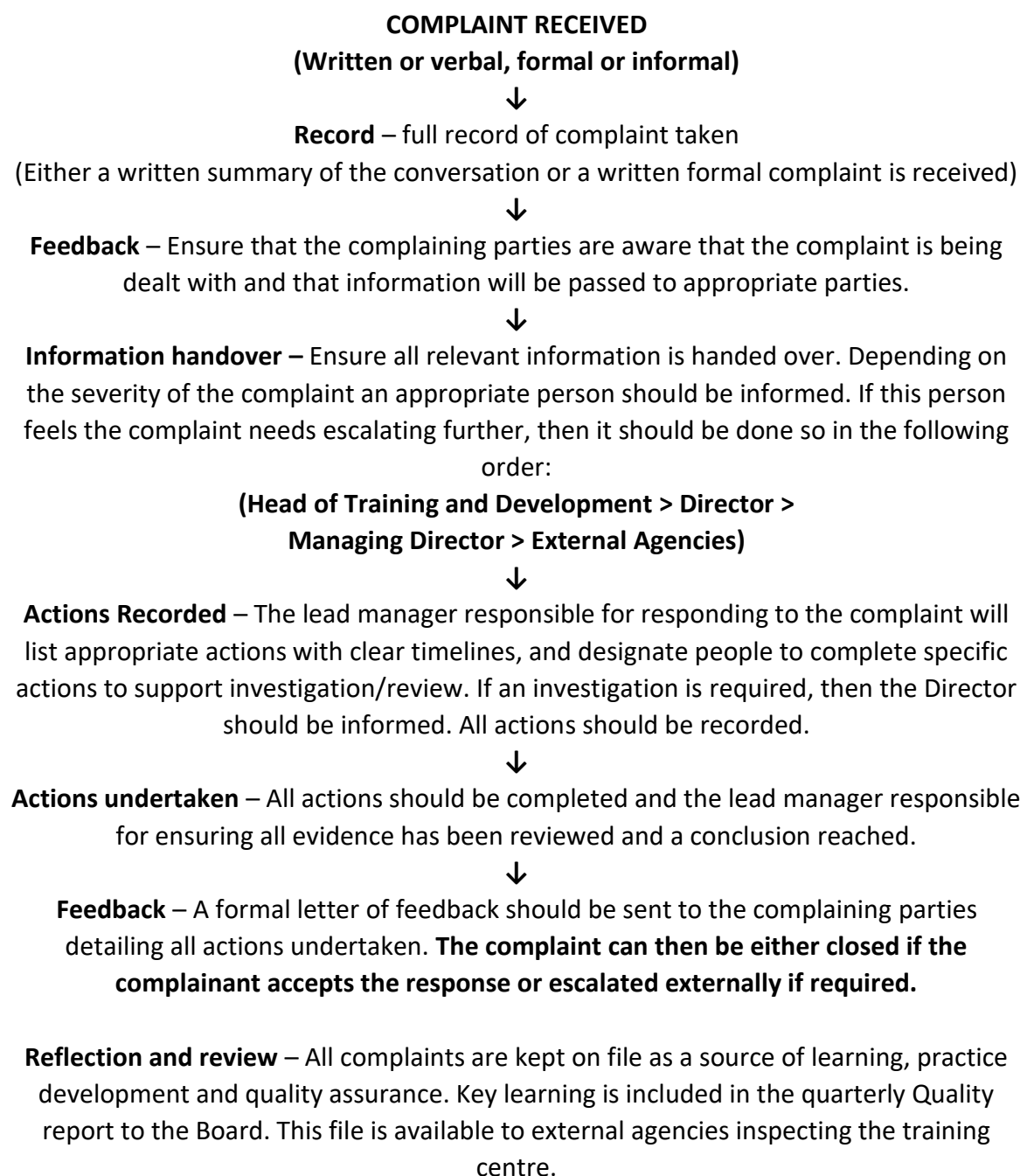
- Upon receiving a complaint, ensure that any conversations with complaining parties are fully recorded. If necessary, a written complaint should be sought
- Ensure that the correct people are informed about the complaint and that all supporting documentation (such as written summaries with complaining parties or written complaints and other details) are handed over in an effective manner
- Follow the diagram listed below to ensure that the complaint goes to the correct person
- Escalate the situation to the Director if they feel the right course of action is not being taken

Diagram for handling complaints:

Complaints may take several forms:

- A full written formal complaint.
- A verbal formal complaint.
- A verbal informal complaint.

In the vast majority of cases complaints can be dealt with informally and internally with the Head of Training and Development overseeing the proceedings. Verbal complaints and informal complaints should be passed over to either the direct line manager or the Head of Training and Development. It is important that the person managing the response to the complaint can adequately judge the severity of the complaint and respond appropriately. If this is not possible then the complaint should be passed to the Director for review. This may then be escalated further if necessary (for example to the Managing Director or external consultant). In cases of the most serious complaints the Managing Director (Mark Ogden-Meade) should be informed who will handle proceedings. If in doubt, follow the diagram below:



Timescales - All complaints are to be acknowledged within 48 hours (working hours) of being received and a full response or interim response with clear actions and timescales provided to the complainant within 10 working days.

Complaints log:

Adequate records of all complaints are kept in a file, whether digitally or in hardcopy by the Head of Training and Development. All documentation is saved and recorded. This includes:

- The complaint itself, in written form. This should either take the form of a formal verbal complaint written up by the member of staff who took the complaint, or a formal written complaint written by the complaining party. All informal complaints do not require to be kept on file or written up as long as the complaining parties do not wish to escalate their complaint to the formal stage
- Any agreed actions
- Evidence that the actions have been carried out (for example full investigations should be included in the complaints file, updated policies included, lessons learnt to incorporate into practice, outcomes from disciplinary procedures included)
- Interim response letters (In the case that a complaint cannot be resolved sufficiently in a timely manner due to staff absences etc)
- Final response letter including details of actions undertaken.

Health and Safety

We believe that the health and safety of staff, learners and visitors is of paramount importance. We make our Training Centre a safe and healthy place for staff, learners, and visitors by assessing and minimising the hazards and risks to enable the learners to thrive in a healthy and safe environment.

- We aim to make our learners, external agencies, and staff aware of health and safety issues and to minimise the hazards and risks to enable the young people to thrive in a healthy and safe environment.
 - Our members of staff responsible for health and safety are:
Michele Budgen (Head of Training and Development) & Alison Bellamy-Gearon (Office Assistant)
-

Insurance cover:

We have public liability insurance and employers' liability insurance. The certificate for public liability insurance is displayed on the Health & Safety board in the entrance to the Training Centre.

This policy is displayed on our health and safety board which includes a detailed list of roles and responsibilities for staff with contact numbers.

Procedures:

Awareness raising

Our induction process for staff and learners includes a clear explanation of health and safety in the workplace as outlined in the induction handbook. A copy is given to every learner and member of staff on induction. All are to adhere to our policy and procedures and understand their shared responsibility for health and safety. The induction process covers matters of employee and learner well-being, including safe lifting and the storage of potentially dangerous substances

All health and safety records are kept in individual files; new staff, learners and volunteers are asked to sign the records to confirm that they have read and understood policies and procedures

Health and safety issues are explained to all parties including learners, staff and where appropriate the parents of learners that relate to the locations that are being accessed (such as the training centre)

Health and Safety is discussed regularly at meetings and training needs are reviewed yearly

We operate a no smoking policy, please refer to the separate policy and procedure for Smoking and E-Cigarettes

Our learners are made aware of health and safety issues through discussions, planned activities and routines

Staff are role models for young people and ensuring their well-being and safety is a priority throughout their time with us at Brighter Horizons

Risk assessment

All accessible areas have an up to date and relevant risk assessment undertaken to minimise any potential risks to those in the environment

Risk assessments are stored and accessible by any staff member

Updates are made to risk assessments as and when new risks are identified

Accident Book

All accidents and incidents are logged in an accident book which is located under reception desk, this is in line with our accident policy. These are reviewed quarterly and reported to the Board by the Director.

Keeping staff, visitors and apprentices safe

Staff, visitors and apprentices are provided with guidance about the safe storage, movement, lifting and erection of large pieces of equipment appropriately.

When staff need to reach up to store equipment or to change light bulbs, they are provided with safe equipment to do so, use of ladders is discussed.

All warning signs are clear and in appropriate languages.

Staff, visitors and apprentices do not visit/work in a building on their own or leave on their own after dark.

The sickness of staff and their involvement in accidents is recorded. The records are reviewed termly to identify any issues that need to be addressed.

We keep a record of all substances that may be hazardous to health - such as cleaning chemicals or gardening chemicals if used. This states what the risks are and what to do if they have contact with eyes or skin or are ingested. These should be kept where the items are stored so the relevant COSHH information can be easily accessed in case of an accident.

We keep all cleaning chemicals in their original containers. Under no circumstances should these be decanted into any other storage media except for the purpose of immediate use. The substances should then be disposed of afterwards and appropriate cleaning undertaken. (For example; mop buckets)

Windows

Low level windows are made from materials that prevent accidental breakage or are made safe.

Staff and learners are made aware of the correct procedures for opening and closing windows.

Windows are protected from accidental breakage or vandalism from people outside the building. For extra security, some windows and doors are secured with locks.

Doors and Floors

We take precautions to prevent fingers from being trapped in doors. Risk assessments are carried out to minimise injury.

All doors are fire safe and remain closed at all times.

All floor surfaces are checked daily to ensure they are clean and not uneven, wet or damaged.

In the event of a spillage or cleaning staff ensure wet floor signs are deployed and visible.

Electrical equipment

All electrical equipment conforms to safety requirements and is checked regularly.

Our boiler/electrical switch gear/meter cupboard is not accessible to the learners or visitors.

All overhead heaters are used only during winter and only by trained members of staff, not learners.

Lighting and ventilation are adequate in all areas including storage areas.

Storage

All resources and materials are stored safely.

Our company laptops are stored safely and securely (locked in filing cabinets at the end of each day).

All equipment and resources are stored or stacked safely to prevent them accidentally falling or collapsing.

Outdoor area

The car park is towards the front of the building and accessed by staff, learners and visitors. The training centre can be accessed via the car park. Staff are vigilant and monitor visitors and learners accessing the car park.

Staff ensure that safety notices are clearly displayed to notify all persons of the risks of passing delivery vehicles.

Hygiene

We regularly seek information from the Environmental Health Officer and the Health Authority to ensure that we keep up to date with the latest recommendations.

Our daily routines encourage best practises with regards hygiene, including daily personal hygiene. If any learner or staff member is found to be lacking in this area they will be discretely spoken to.

We have a daily cleaning routine for the training centre to ensure it remains in a clean and presentable state.

The toilet area has a high standard of hygiene including hand washing and drying facilities and the disposal of sanitary products.

We implement good hygiene practices by:

- Following policies and procedures at all times
- Cleaning tables regularly
- Cleaning toilets regularly
- Wearing protective clothing - such as aprons and disposable gloves - as appropriate
-

Activities and resources

Before purchase, equipment and resources are checked to ensure that they are safe

The layout of training rooms with tables allows for safe movement and easy evacuation in case of fire

All equipment is regularly checked for cleanliness and safety and any dangerous items are repaired or discarded

All materials, including paint and glue, are non-toxic

Learners learn about health, safety and personal hygiene through the activities and information we provide for them if necessary

Any faulty equipment is removed from use and is repaired. If it cannot be repaired, it is discarded

Large pieces of equipment are discarded only with the consent of the Head of Training and Development

Brighter Horizons – Health and Safety

Roles and Responsibilities

This document outlines the roles and responsibilities for staff members at the training centre. Each role should be clearly defined, and the responsibilities are listed below the named person.

Site Address: 3, Grooms Court, Billingshurst, West Sussex RH14 9EU

Company Lead for H&S: **Michele Budgen**

Responsibilities: To ensure that the good practise and record keeping of Health and Safety is consistent throughout the company. To attend regular training regarding H&S. To ensure staff are aware of their roles and responsibilities. To ensure health and safety of the building is understood, sharing knowledge and areas of responsibility with appropriate staff. To maintain good practise regarding Health and Safety at Work and to ensure all appropriate staff are COSHH trained who deal with substances harmful to health. To ensure that all areas of the

centre are risk assessed and that this is standard practise. To ensure up to date records and documents are maintained.

Health and Safety Officer: : **Alison Bellamy-Gearon**

Responsibilities: To ensure that all daily checks are carried out and recorded appropriately. To ensure any new areas that are created are fully risk assessed. To raise and record any issues requiring action (including maintenance) to the attention of the Company Lead for H&S.

Fire safety martial: **Michele Budgen**

Responsibilities: To ensure that regular weekly checks are performed and recorded on the fire alarm system. To carry out a termly evacuation that is recorded. To ensure all members of staff are aware of the fire evacuation procedure.

Coronavirus (COVID-19) risk assessment for staff, learners, and visitors

Until government guidelines change, currently wherever possible, staff should work from home. Where it is not possible, the following measures are a minimum requirement. Staff should be aware that the latest government guidelines always apply and must be checked regularly by each member of the team to ensure all precautions are taken accordingly.

Duty	Element	Risk	Control measures
<p>Travel to and from the training centre for staff. Learners are not permitted at the training centre during lockdown periods.</p> <p>Travel to and from on-site locations for staff.</p>	Transport	<p>Lowest level of risk, maintaining one person in their own personal space.</p> <p>A vehicle could be a means of transferring the virus between home and workplace</p>	<p>Parking is available at the training centre for those travelling by car.</p> <p>It is recommended that all drivers maintain the cleanliness of their own vehicles taking particular care to sanitise the hard interior and exterior contact surfaces. This will reduce the risk of cross contamination.</p>
	Public Transport	<p>Any public transport is high risk and increases the risk of infection from passengers.</p>	<p>Car sharing is not allowed during lockdown periods as this will increase the risk of transmitting the disease and does not practice social distancing guidelines.</p> <p>Where public transport travel is unavoidable, the following guidance should be adhered to:</p> <ul style="list-style-type: none"> • Always try and maintain a two-metre gap between
	Cycle/walk		

		<p>Cycling or walking to work presents a lower risk of infection if social distancing guidance is followed.</p>	<p>yourself and other passengers.</p> <ul style="list-style-type: none"> • Wear a face mask and other appropriate PPE to reduce risk of contamination. • Wash hands in line with WHO guidance immediately on arrival at destination. <p>Maintain social distance from other pedestrians. Cycle/walk alone.</p>
Work/place of training	<p>When you arrive and throughout your day</p> <p>Office spaces</p>	<p>Many hard surfaces could become contaminated</p> <p>Any person in the office is required to maintain the government guidance on social distancing – currently two metres.</p>	<p>Hand sanitising stations are located throughout the building.</p> <p>Enhanced cleaning schedules are to be maintained throughout the day, paying particular attention to the hard surfaces. This is the responsibility of the Office Support Worker or in her absence should be allocated to a member of the team.</p> <p>Doors and windows will be kept open to minimise the risk of contamination through aerosol transmission.</p> <p>Outside areas may be used but social</p>

		<p>distancing must be followed.</p> <p>Each employee will take personal responsibility and wipe down their equipment, copiers, desks etc. at the end of the day and frequently through the day.</p> <p>Those who can work from home are required to do so under current government guidelines</p> <p>Staff who are required in the office should get clearance from their line manager.</p> <p>Office layout must ensure that a two-metre gap is maintained.</p> <p>A strict clear desk policy will be in place to allow a full clean at the end of each day. The Head of Training and Development will allocate this role to a member of the team.</p> <p>Line managers will ascertain the maximum number of staff in at any one time whilst</p>
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			<p>maintaining the required social distance.</p> <p>Flexible start finish times may need to be amended to ensure we can maintain the social distancing requirements.</p>
	<p>Classrooms and practical training room (Learners are not able to use the training centre during lockdown. The following relate to post lockdown process/procedures)</p>	<p>Learners and trainers must maintain two metres distance where possible.</p> <p>All classroom and furniture will require sanitisation in between courses (where practicable) and throughout the day as required. The Head of Training and Development will allocate this role to a member of the team.</p>	<p>Classroom desks to be arranged to ensure 2m social distancing throughout.</p> <p>Maximum learner numbers reduced or multiple trainers.</p> <p>Clear desk policy at the end of working day to allow for cleaning. Learners to remain with their allocated desk throughout the duration of the course</p> <p>Course stationery poses a risk of cross contamination. Practical equipment, test equipment, training aids will be subject to cross contamination by each user on each respective course, as well as between courses</p> <p>Each learner will be issued their own</p>

		<p>Course notes and handouts pose a risk for potential cross contamination of issuing documentation, marking of assessments.</p> <p>Course stationery poses a risk of cross contamination.</p>	<p>individual tray and all material and stationery will be contained in the tray for the duration of the course.</p> <p>All trays will be taken away at the end of the course day.</p> <p>Any IT equipment used must be cleaned before and after each use and suitable wipes will be available in each classroom and practical area.</p> <p>Course documentation to be produced in advance of course, minimum of 72 hours, to allow for the degradation of any contaminants and a complete set of documents including handouts and workbooks issued.</p> <p>All assessments are to be placed in individual sealed envelopes with assessments marked on the premises and gloves and face masks to be worn whilst</p>
		<p>Practical equipment, test equipment, training</p>	

		<p>aids will be subject to cross contamination by each user on each respective course, as well as between courses</p>	<p>marking and disposed of after use.</p> <p>Assessments to be left sealed in the classrooms.</p> <p>Gloves to be worn during setting up of classrooms and the exchange of any paperwork or stationery.</p> <p>Course groups to be split into all available areas and where possible each area will have a separate entrance and exit. Where this is not possible one-way systems must be in place.</p> <p>Where practicable, relocate practical equipment into larger areas. All test/ practical equipment used to be sanitised before and after use.</p>
	<p>Shared areas</p>	<p>Staff/ learners will require access to toilets, refreshment areas and the kitchen area during the day. These areas are high risk.</p>	<p>Staff should only work in their allocated workspace area, communicating through phone/radio & computer; only essential movement around the site/building allowed and 2-</p>

		<p>metre distancing required at all times.</p> <p>Where possible each area has its own toilets allocated. In either case, the toilets will be deep cleaned at least daily as well as maintained cleanliness throughout the day. The Head of Training and Development will allocate this role to a member of the team.</p> <p>Everybody using the toilets must observe meticulous standards of personal hygiene and follow the guidelines on handwashing.</p> <p>Antibacterial wipes to be provided in each toilet area and users to wipe down surfaces and handles after use, appropriately disposing of wipes in the bin.</p> <p>Use of the refreshment areas and kitchens should be managed and with social distancing requirements</p>
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			<p>maintained adhering to floor and wall signage.</p> <p>Staff must bring their own drinking vessels in and provide their own food, utensils, and cleaning products. There will be no sharing of food, utensils etc.</p> <p>Disposable cloths/paper towels must be used and disposed of immediately.</p> <p>All shared product and cloths will be removed from any shared space.</p> <p>All refreshment areas must be wiped down after every use.</p> <p>Paper cups must be used by learners and disposed of by the learner after each use</p>
Maintenance / contractors around site	Maintenance jobs - contractors visiting site	High risk of infection	<p>Maintenance team made aware of risk assessments in place and must adhere to our measures in place.</p> <p>Contractors to site made aware of risk assessments and the measures we have in place.</p>

	<p>Cleaning - classrooms, shared spaces and office areas</p>	<p>The risk of infection is high.</p> <p>Where possible allocate domestic staff per area to restrict the cross contamination and movement between areas.</p>	<p>Allow learners and employees to wear face masks if they want to.</p> <p>Masks must be disposed of after each use as reusing carries more risk than not using one at all.</p> <p>The offices, shared areas and classrooms shall be deep cleaned every night paying particular attention to:</p> <ul style="list-style-type: none"> • Desktops • IT equipment paying particular attention to keyboards • Arms and mechanics of chairs • Telephones • All toilets and kitchens should be wiped down throughout the day • All kitchen appliances should be wiped down throughout the day • Supplies of soap/ hand sanitisers should be topped up • Tea towels and material cloths to be disposed of and replaced with paper towels in all areas. • All bins to be emptied

			<p>throughout the day and where possible should not have a lid that needs touching to open.</p> <ul style="list-style-type: none">• All door handles interior and exterior to be cleaned throughout the day. <p>The Head of Training and Development will allocate this role to a member of the team.</p>
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E-Safety - Our Commitment

Brighter Horizons recognises the benefits and opportunities which new technologies offer to teaching, learning and business execution. We provide ICT and internet access to all learners and colleagues and encourage the use of technologies to enhance skills, promote achievement and enable lifelong learning.

Objectives

This policy explains our approach to E-safety and how colleagues and learners should behave when using systems and equipment.

Key Contacts

Michele Budgen - Designated Safeguarding Lead

michele@brighterhorizonstraining.co.uk

Telephone number: 07787 516242

Overview

The accessibility and global nature of the internet and different technologies available mean that we are also aware of potential risks and challenges associated with such use.

Our approach is to implement appropriate safeguards within the training centre, and wider operation, whilst supporting colleagues, employers, and learners to identify and manage risks independently and with confidence.

Furthermore, we expect our partner organisations to demonstrate practices and culture which meet with the standards laid out within this policy. We believe this can be achieved through a combination of security measures, training, guidance, and implementation of our wider policies.

This policy should be read alongside other relevant Brighter Horizons policies including Safeguarding and Prevent.

Use of ICT

Brighter Horizons is committed to achieving the principles of the General Data Protection Regulation GDPR (May 2018)

Information Communication Technology (ICT) and Information Technology (IT) systems will be provided which contribute towards these aims. Further information on the steps enacted by Brighter Horizons to protect the data provided to us by data subjects can be found in our Data Protection policy.

Colleagues and learners are not permitted to use software or any other method of interfering with any of the company's computer equipment.

Colleagues and learners are not permitted to download software or install any software onto any company's computer system except on advice from a member of the management leadership team.

Much of the material on the internet is protected by copyright laws and therefore the company, the colleague and the learner could be liable under civil and criminal law for any unauthorised copying. It is expected therefore that individuals are mindful of copyright when undertaking to use the internet.

Brighter Horizons has the right to review all files and records and the right to periodically monitor, audit or review network, workstation, internet, and e-mail use on the company network. This extends to both colleagues and learners and will be notified to users via a privacy statement.

Use of the Internet

Where appropriate, the use of the internet is encouraged as part of official, professional, and learning activities. It is recognised as a source of up-to-date information and provides guidance on several business and vocational related matters. Internet access is provided for business and learning purposes only, not personal use.

Brighter Horizons will review internet activity and analyse usage patterns and may choose to perform detailed analysis of the data to assure that the network and internet access are devoted to maintaining the highest levels of productivity and security.

Brighter Horizons prohibits the use of unauthorised sites. If you find the network connected accidentally to a site that contains sexually explicit, radical, extremist, or offensive material, you must disconnect from that site immediately, regardless of whether that site has previously been deemed acceptable by any screening or rating program. All such circumstances must be reported to a line manager.

Use of the internet and ILT by our learners is encouraged. Brighter Horizons provides internet access to learners at the training centre and access to web-based learning management systems to further their learning and development through the provision of learner networks and bring your own device approaches. We will provide appropriate education to ensure that our learners have the tools to protect themselves from potential risks of harm during such activities.

Virus protection procedures seek to prevent the introduction of virus contamination into the Brighter Horizons network. Unauthorised software including public domain software, magazine cover discs/CDs, USB memory sticks, external hard drives, or internet/world wide web downloads must not be used.

Levels of Responsibility

This policy is under Board governance and is reviewed annually by Brighter Horizons.

All colleagues are responsible for ensuring the safety of learners and should report any general concerns about their E-safety in line with our Safeguarding policy to a Safeguarding Manager.

The E-safety Officer is the company's Designated Safeguarding Lead (DSL). The E-safety Officer is responsible for keeping up to date with new technologies and their use, as well as attending relevant training. They will coordinate colleague development and training, record incidents, report any developments and incidents to the Board and liaise with the local authority and external agencies as required in line with Safeguarding and Prevent policy.

Managing and Responding to Risk

Colleagues should be particularly mindful that technology is used by young people that are at risk of harm or engaging in criminal or risk-taking behaviours. This includes viewing sexualised imagery of children, county lines activity, viewing or engaging in extremist narrative and grooming behaviour.

In line with our safeguarding procedure the following concerns about learners should be reported:

- Behavioural changes.
- Becoming withdrawn.
- Increased or decreased usage of their device.
- Flinching when their device makes an alert sound.
- Having two phones.
- Change in personal presentation.
- Use of extremist language/views.
- Apparent access to inappropriate radical or offensive material.
- Involvement in the production of or distribution of youth produced imagery.
- Scripted speech.
- Having access to wealth beyond their means.
- Going missing from education.
- Use of Personal Social Networking
- Personal Social Networking should be used by colleagues with due diligence:
 - Information once published, e.g., photographs, blog posts, is impossible to control and may be manipulated without consent, used in different contexts, or further distributed.
 - Ensure appropriate security settings are applied so access to your profile is limited to those explicitly given access to do so.

Colleagues should also refer to the Social Media policy.

Inappropriate Use

Unauthorised or inappropriate use of the ICT systems may result in disciplinary action which could lead to dismissal.

Violations of this policy may subject the individual to disciplinary and/or legal action as may be deemed necessary.

Teaching and Learning

Learners must always act safely and responsibly when using the ICT and ILT provided to them by Brighter Horizons. We will provide them with an education which develops their ability to meet this requirement. Alongside this, learners using their own devices, or the learner network will be issued with a privacy statement and acceptable usage guidance on acceptable internet use with which they are expected to comply.

We operate safe surfing and monitor and restrict access to harmful sites within our Training centre. Training centre-based learners will be introduced to such E-safety mechanisms as a part of their induction. This will include a privacy statement outlining how personal data will be used for the purposes of safeguarding.

Learners are responsible for participating in E-safety education as part of the curriculum. This will be delivered using the approved resources.

Learners will be briefed on safeguarding reporting procedures and encouraged to report any concerns that they may have about themselves or another learner in relation to E-safety.

All learners must know what to do if they have E-safety concerns and who to talk to. In most cases, this will be their Personal Tutor or Tutor.

Training

To support colleagues to safeguard the learner and in addressing E-safety matters with learners, they will be provided with training and directed Continuing Professional Development in E-safety matters. This will be embedded into induction training for new colleagues and into the formal continues professional development training.

Monitoring and Review

The impact of the policy will be monitored regularly with a full review being carried out at least once a year.

The policy will also be reconsidered where concerns are raised or where an E-safety incident has been recorded.

Quality Assurance

The management and all who work at Brighter Horizons are committed to providing the highest possible level of service in exceeding the requirements of their apprentices. This level of service is achieved through quality management and a set of procedures that reflect the Company's priorities.

This quality assurance policy outlines our belief and commitment to ensure that ongoing quality improvement is an integral part of our organisation. Brighter Horizons will aim for continuous improvement in the quality of all aspects of its work as part of its determination to help learners achieve the highest possible standards.

- The purpose of the Quality Assurance Policy is to ensure such continuous improvement through a process of self-evaluation and action planning, audits, reviews and standardisation activities take place regular.
- The Quality Assurance Policy and associated procedures will involve all employees within the training centre. The management of the process will be through the existing organisational structure. The Head of Training and Development will initiate procedures within the team and collate and agree actions plans which will feed into the Board quarterly.
- The quality assurance procedures will be founded in a process of regular self-evaluation from the whole team, course evaluations, observations, audit against standards, employer, and student feedback, which informs the action plan and is acted upon in a timely manner.
- Key performance indicators will be used to provide a quantitative perspective with measurements capturing on-programme viability and gateway/EPA success, initial engagement and conversion rates, registration numbers, milestones achieved by percentage against plan, CPD uptake etc.
- The procedures will also seek the views and perceptions of learners and other stake holders of who access our training to provide qualitative analysis.
- Wherever appropriate, the procedures will promote the identification of quality standards and performance indicators which can be measured, evaluated and improved for example using national benchmarking and OFSTED data.
-

Responsibility for Implementation

- All staff (directors, trainers, assessors, and support staff) are responsible for the implementation of the Quality Assurance Policy.
- The Company Director is responsible to ensure that there is an annual review of the policy and action plan.
- It is the responsibility of all to engage positively in that review and ensure implementation.

Focus of Quality Assurance

- The focus is to encourage continuous improvement in the quality of all teaching and learning programmes, thereby making learning an enjoyable activity and through this, increasing learner retention and achievement of individual learning aims.
- To sustain our provision of high-quality apprenticeships, we will also offer higher level courses and short CPD courses which provide opportunities for progression and which provide learners with vast experience and further qualifications.
- We ensure rigorous, standardised, and consistent assessment procedures, which meet the standards of external awarding bodies and our internal audits to identify and respond to areas of practice which requires improving.
- We provide information which supports strategic planning.
- Our self-assessment facilitates ongoing improvement through the quality improvement plans which are completed regularly and reported to the Board quarterly.
- We monitor and evaluate the procedure for advising, interviewing, and coaching learners at entry and throughout their time at Brighter Horizons involving other agencies as required (for examples refer to safeguarding policy).
- We establish standards and monitoring procedures for providing a supportive and accessible range of services to all learners and staff as appropriate

We will use the quality assurance agenda with our staff to:

- Review regularly the performance, training and development needs of all employees through the operation of Brighter Horizon's appraisal process, one to one RAG rating system with all staff.
- Encourage continuous professional development (CPD) and to offer training and development to individuals from induction and throughout their employment.
- Monitor and evaluate performance and developmental needs through observations, self-evaluation, IQA and target setting.
- Share good practice between the team and involve staff in development activities for areas requiring improvement.
- Provide information which supports strategic planning for Brighter Horizons in line with the company's business development process.

We will use the quality assurance agenda with our learners to:

- Ensure that they know what we expect of them and also to what level they should be aspiring to achieve.
- Help them keep track of their progress through our RAG rating procedure so the journey ahead is always clear and 2-way communication encouraged.
- Encourage feedback (including surveys, review meetings and exit questionnaires) to make sure that we are actively listening and acting on feedback.
- Work alongside employers to support them build and develop the programme to ensure that we are adding value and ensuring that the apprentice is suitably qualified by the end of their programme so that they can secure employment in their new role.

To support this, we will monitor and evaluate performance in the workplace and discuss this in the triangular monthly progress review.

- Continuously and rigorously assess learner's work to ensure standards are being achieved and the learners are receiving a high-quality programme of learning.

We will use the quality assurance agenda with employers to:

- Make sure that they are fully signed up to our Commitment Statement – understanding the requirements and expectations of the apprenticeship, being aware of their role in supporting the apprentice's learning and development and of Brighter Horizon's policies and procedures (especially with regards to safeguarding procedures and health & safety).
- Ensure that we engage proactively with them to develop the programme to meet their needs alongside the needs of a prospective apprentice and to establish clarity of communication and expectation so that we can monitor, support and develop the apprentice's skills, knowledge and behaviour collaboratively.
- Encourage them to give us honest feedback so that we can continue to develop the programmes we develop keeping open channels of communication throughout the apprenticeship programme.
- Encourage them to partake in audits and surveys on their apprenticeship experience with us.

Procedure

The process of quality control requires all staff to meet on a regular basis to review their work, set standards and monitor learner perceptions and achievements.

- Quality control will be carried out against agreed criteria which will incorporate performance indicators
- Statistical analysis will be carried out against criteria which will incorporate performance indicators
- Review will be supported by analysis of learner, employees and stakeholder views and perception, gathered via questionnaire, surveys and review meetings.

The outcome of these processes will provide information:

- To action plan for improvement
- To highlight issues that need consideration by Brighter Horizons and/or company directors.
- To support Brighter Horizon's business growth and strategic planning cycle
- To support Brighter Horizon's contract compliance to a high standard
- To inform the process of Brighter Horizon's self-assessment and development planning.

Feedback on actions resulting from this quality review will be communicated to all employees via regular team and / or individual meetings.

The outcomes and action plans which result from the process will form the basis of Brighter Horizon's development plans and self-assessment report (SAR)

General Data Protection Regulation (May 2018)

INTRODUCTION

Brighter Horizons Training are fully committed to compliance with the requirements of the GDPR 2018. To this end Brighter Horizons fully endorse, adheres to and complies with the eight principles of the Act that states personal information held by us shall be:

- Fairly and lawfully processed
- Processed for limited purposes
- Adequate, relevant, and not excessive.
- Accurate and up to date.
- Not kept for longer than is necessary
- Processed in line with employer/employee rights.
- Secure; and
- Not transferred to other countries without adequate protection.

In order to operate efficiently, Brighter Horizons Training have to collect and use information about people with whom it works. These may include employees, sub-contractors, learners, parents, volunteers, employers, suppliers and/or other parties.

Personal information will only be processed in line with established regulations. Personal data will be collected, recorded, and used fairly, stored safely and securely and not disclosed to any third party unlawfully.

As the lawful and correct treatment of personal information is critical to our successful operations and to maintaining confidence, Brighter Horizons Training are committed to:

- Protecting trainees / Apprentices and other individuals' personal details, records and assessment outcomes.
- Protecting all records, learning journeys, financial and confidential records of all our children and parents.
- Keeping trainees' / Apprentices and other individuals' personal data up to date and confidential.
- Keeping information on children, parents, billing, and other vital operational data up to date, safe and secure.
- Maintaining personal data only for the time period required.
- Releasing personal data only to authorised individuals / parties and will not do so unless permission is given.
- Collecting accurate and relevant data only for specified lawful purposes.
- Adhering to regulations and related procedures to ensure that all employees who have access to any personal data held by or on behalf of Brighter Horizons Training are fully aware of and abide by their duties under the GDPR 2018.
- All data processors understand their obligations under the GDPR 2018 and receive regular refresher training.

Brighter Horizons Training is a training provider, learners' personal information may need to be shared at some point. By providing personal information and signing a training plan, learners consent to their data being shared with limited and relevant external parties. This occurs in the following circumstances:

- Brighter Horizons may be required to share personal information where delivery of services are impacted or where we are required to by law, for example we provide details to the local authority regarding SEN children and all grant-funded children.
- Where Brighter Horizons needs to share learner information to provide the service, they have requested;
- Where Brighter Horizons needs to send the information to companies who we work in partnership with or on behalf of Brighter Horizons to provide a service to the learner (we will only provide those companies with the information they need to deliver the service, and they are prohibited from using that information for any other purpose)
- Brighter Horizons may use photos and videos of staff and learners on our website, social media etc; this is only with the express written permission of the parties involved.
- Brighter Horizons will also disclose personal information if required to do so by law in urgent circumstances, to protect personal safety, for safeguarding reasons or to protect the public.

Brighter Horizons data is stored in controlled servers with limited access. All personal information is stored and processed in the United Kingdom where Brighter Horizons, or their business partners, are located.

The Company website does not target, and is not intended to attract, children under the age of 14. Brighter Horizons do not knowingly solicit personal information from children under the age of 14 or send them requests for personal information.

If you have any questions or concerns about the collection, use, or disclosure of your personal information, please contact a company Director.

Brighter Horizons may amend this policy from time to time. If we make any substantial changes in the way, we use your personal information we will make that information available.

B) RIGHT TO INFORMATION

GDPR gives individuals the right to know what personal information is held about them on computer and paper records. Should any employee of Brighter Horizons feel they have been denied access to personal information they are entitled to view or feel their information has not been handled according to the eight principles, they can contact the Information Commissioner's Office, Wycliffe House, Water lane, Wilmslow, Cheshire, SK9 5AF. The information line is: 01625 545700.

C) CONTRAVENTION OF THIS POLICY

Failure to comply with any of the requirements of this policy is a disciplinary offence and may result in disciplinary action being taken under Brighter Horizons disciplinary procedure.

Conflict of Interest

To avoid any potential conflict of interest Brighter Horizons Training ensure that any activity undertaken by it or on its behalf does not have the potential to act contrary to its role in the delivery and assessment of Cache qualifications in accordance with the Ofqual conditions of Recognition.

Centres must ensure that any assessments of learners (including internal quality assurance sampling) are not undertaken by any person who has a potential interest in the result of the assessment. Where an assessment by such a person cannot be avoided, arrangements will be made for the relevant part of the assessment to be subject to scrutiny of another person.

Staff doing a qualification will be sampled by the EQA.