



MANAGEMENT & STAFF MANUAL

2024-25

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INTRODUCTION

Welcome to the Education House Leeds Management and Staff Manual!

At Education House Leeds, we are committed to providing a safe, inclusive, and conducive learning environment for all our students. This manual serves as a comprehensive guide for our management and staff, outlining the policies and procedures that govern our institution. These policies are designed to ensure the well-being of our learners, promote fairness, and maintain the highest standards of professionalism.

- ✓ ***Safeguarding Policy:*** Our commitment to the safety and well-being of our students is paramount. This policy outlines the procedures and responsibilities in place to protect learners from harm.
- ✓ ***Access to Fair Assessment Statement:*** We believe in fair and equitable assessment practices. This statement sets forth our commitment to providing all learners with equal opportunities during assessments.
- ✓ ***Equality & Diversity Policy:*** Education House Leeds is dedicated to promoting equality and diversity. This policy underscores our commitment to fostering an inclusive and supportive learning environment for everyone.
- ✓ ***Security & Auditing of Learners Records & Achievement:*** We prioritize the security and confidentiality of learner records. This policy outlines the measures in place to safeguard and audit these records.
- ✓ ***Anti-bullying & Harassment Policy:*** Our institution maintains a zero-tolerance stance towards bullying and harassment. This policy defines our approach to preventing and addressing such behavior.
- ✓ ***Anti-Radicalization & Extremism Policy:*** Education House Leeds is committed to preventing radicalization and extremism. This policy outlines the steps we take to safeguard our learning community.
- ✓ ***Conflict of Interest Policy:*** We uphold the highest standards of integrity. This policy addresses situations where conflicts of interest may arise and provides guidelines for managing such situations.
- ✓ ***Data Protection Policy:*** Ensuring the privacy and security of personal data is of utmost importance. This policy outlines our compliance with data protection laws and the measures in place to safeguard sensitive information.
- ✓ ***Disability Discrimination Policy:*** We are dedicated to providing an inclusive learning environment for individuals with disabilities. This policy prohibits discrimination and outlines our commitment to reasonable adjustments.
- ✓ ***Document Retention & Secure Storage Policy:*** Proper document management is crucial. This policy provides guidelines for the retention and secure storage of essential documents.
- ✓ ***Equal Opportunities Policy:*** Education House Leeds promotes equal opportunities for all. This policy reaffirms our commitment to providing fair and equal access to education and employment.
- ✓ ***General Data Protection Regulations (GDPR) Policy:*** This policy details our compliance with GDPR regulations and our commitment to protecting the privacy of personal data.
- ✓ ***Health & Safety Policy:*** The safety and well-being of our students and staff are paramount. This policy outlines our commitment to maintaining a safe learning environment.
- ✓ ***International Review & Quality Assurance Policy:*** We are dedicated to maintaining high-quality education standards. This policy outlines our commitment to regular reviews and quality assurance processes.

- ✓ **Privacy Policy:** Our commitment to privacy extends beyond data protection. This policy addresses our approach to privacy in various aspects of our operations.
- ✓ **Prevent Policy:** Education House Leeds is proactive in preventing radicalization and extremism. This policy outlines our strategies for preventing and addressing these issues.
- ✓ **Reasonable Adjustment & Special Considerations Policy:** We are committed to providing reasonable adjustments to accommodate the diverse needs of our learners. This policy outlines our approach to special considerations.
- ✓ **Risk Management Policy:** Identifying and mitigating risks is essential for our institution's success. This policy outlines our approach to risk management to ensure a secure learning environment.
- ✓ **Teaching Contingency Policy:** This policy addresses our approach to unforeseen circumstances that may impact teaching, ensuring continuity and minimal disruption to the learning experience.

Our commitments

- ✓ **Safeguarding:** Ensuring student well-being is our top priority.
- ✓ **Fair Assessment:** We guarantee equal opportunities in assessments.
- ✓ **Equality & Diversity:** Fostering an inclusive learning environment is our commitment.
- ✓ **Security & Auditing:** We secure and audit learner records with utmost confidentiality.
- ✓ **Anti-bullying & Harassment:** Zero tolerance for bullying and harassment.
- ✓ **Anti-Radicalization:** We actively prevent radicalization and extremism.
- ✓ **Conflict of Interest:** Our commitment to integrity in all situations.
- ✓ **Data Protection:** We adhere to strict data protection regulations.
- ✓ **Disability Discrimination:** Ensuring an inclusive environment for all learners.
- ✓ **Document Retention:** Guidelines for the secure storage and retention of documents.
- ✓ **Equal Opportunities:** Promoting fairness in education and employment.
- ✓ **GDPR Compliance:** Strict adherence to General Data Protection Regulations.
- ✓ **Health & Safety:** A commitment to maintaining a safe learning environment.
- ✓ **Quality Assurance:** Regular reviews to uphold high-quality education standards.
- ✓ **Privacy:** Respecting privacy across all aspects of our operations.
- ✓ **Prevent:** Proactively preventing radicalization and extremism.
- ✓ **Reasonable Adjustment:** Providing reasonable adjustments for diverse learner needs.
- ✓ **Risk Management:** Identifying and mitigating risks for a secure learning environment.
- ✓ **Teaching Contingency:** Addressing unforeseen circumstances to ensure continuous learning.

We encourage all staff members to familiarize themselves with the contents of this manual, as adherence to these policies is essential to maintaining the high standards of Education House Leeds. By working together, we can create a positive and enriching educational experience for all.

1. Safeguarding Policy

1.1 *The purpose of this policy is to:*

- ✓ Protect all learners studying at Education House Leeds (eHouse) and all those visiting eHouse admin office and our training delivery facility, the SHINE CENTRE from harm;
- ✓ Enable staff to safeguard and promote the welfare of learners;
- ✓ Encourage a culture which makes eHouse a safe learning place.
- ✓ The policy applies to everyone working, studying at or visiting our eHouse.

1.2 *Policy Statement for the Safeguarding of trainees / students*

The eHouse:

- ✓ Recognises that learners have a fundamental right to be protected from harm, exploitation and discrimination, and that students cannot learn effectively unless they feel safe;
- ✓ Will provide an environment that is safe, promotes equality, self-confidence, a feeling of worth and the knowledge that students' concerns are listened to and acted upon;
- ✓ Is committed to ensuring that best practice is adopted for learners and offering them support and protection, and accepts that it has a legal and moral responsibility to implement procedures to fulfil its duty of care
- ✓ Recognizes that it is statutory and moral duty to promote and safeguard the welfare of students receiving education and training at the eHouse.

The key principles of Safeguarding are:

- ✓ The safeguarding of the student is paramount. Staff should consider, at all times, what is in the best interests of the learners or students.
- ✓ Safeguarding is everyone's responsibility – for services to be effective, each profession and organisation should play their full part.
- ✓ A student-centred approach – for services to be effective, they should be based on a clear understanding of the needs and views of students.
- ✓ All learners, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- ✓ All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a student or vulnerable adult is at risk of harm.
- ✓ Learners and staff involved in safeguarding issues will receive appropriate support.
- ✓ Staff should never promise a student that they will not tell anyone about an allegation, as this may ultimately not be in the best interests of the student.

Safeguarding and promoting the welfare of trainees / students is defined as protecting them from harm. If a student is in immediate danger or is at risk of harm, a referral should be made to the police immediately if required. Anyone can make a referral. Where referrals are not made by the designated safeguarding lead, the designated safeguarding lead should be informed as soon as possible that a referral has been made.

There are three main elements to this Policy:

- ✓ **Prevention:** Providing safe physical and on-line environments, careful and vigilant teaching, accessible pastoral care and support students.
- ✓ **Protection:** Providing training, support and clear procedures to enable staff to respond appropriately and sensitively to students.
- ✓ **Support:** Providing help and support to students who do not feel safe or may have been abused.

1.3 Aims

- ✓ To raise staff awareness of the importance of safeguarding students and of their responsibilities for identifying and reporting actual or suspected harm.
- ✓ To ensure that everyone knows that eHouse takes Safeguarding very seriously and will follow the appropriate procedures for identifying and reporting it, and for dealing with allegations against staff.
- ✓ To liaise effectively with other agencies working in student safeguarding area

1.4 Roles and responsibilities

eHouse will:

- ✓ Provide Safeguarding and Prevent to students during full course and ensure they know who to contact should they feel unsafe.
- ✓ Appoint a Designated Safeguarding Lead (DSL) who is a member of the Senior Leadership Team, who will provide support to staff members to carry out their safeguarding duties.
- ✓ Provide appropriate Safeguarding training for all staff.
- ✓ Require all staff to read and implement safeguarding policy.
- ✓ Ensure that all staff have completed DBS checks.

Designated Safeguarding Office will:

- ✓ Take the lead responsibility for safeguarding and student protection at eHouse
- ✓ Be responsible for the commissioning and/or provision of services designated to safeguard and promote the welfare of students
- ✓ Be responsible for the appropriate training (including regular updates) of all staff
- ✓ Be responsible for managing inter-agency referrals to relevant organization or department where there is a radicalisation concern, and to the Police for cases where a crime may have been committed
- ✓ Be responsible for the collation and secure storage of all records relating to Safeguarding, Prevent or Student Protection incidents and concerns;
- ✓ Develop effective links with relevant statutory and voluntary agencies
- ✓ Ensure that the safeguarding policy and procedures are reviewed and updated annually and liaises with the nominated Prevent office and principal as appropriate;
- ✓ Receive appropriate training and disseminate knowledge, attend relevant conferences, keep up to date with all matters relating to Safeguarding, Prevent and Student Protection and provide written reports as required;
- ✓ Follow agreed reporting and monitoring procedures.

Trainers / lectures will:

- ✓ Identify and meet the needs of individual students;
- ✓ Ensure that students feel safe and secure and are encouraged to talk and share their concerns, and that they are listened to;
- ✓ Recognize that students with special educational needs or disabilities may be especially vulnerable to abuse and take extra care to interpret apparent signs of abuse or neglect.

All staff will:

- ✓ Promote and apply eHouse Safeguarding Policy and procedures;
- ✓ Raise any safeguarding concern about a learner through the safeguarding procedures.
- ✓ May also report their concerns directly to trainee / student or police if they believe direct reporting is necessary to secure action.
- ✓ Raise any safeguarding concerns about another staff member to the principal.
- ✓ Raise complaints about the principal to eHouse Managing Director.

1.5 Staff training

It is important that all staff receive training to enable them to recognise the possible signs of non-safeguarding and to know what to do if they have a concern.

New staff will receive safeguarding information during their induction, which includes the eHouse’s student safeguarding policy and staff behaviour policy and details for the Designated Safeguard Lead. All staff, including the DSL, principal and managing director will receive training that is regularly updated.

1.6 Liaison with external agencies

eHouse will promote effective liaison with other agencies in order to work together for the protection of all students, in line with statutory guidance.

1.7 Who needs to understand this policy and how will they know about it?

Everyone working, studying or visiting eHouse needs to understand this Policy. The Policy is published on eHouse website. In addition, the following training and awareness will be put in place:

Who?	How?
All staff	Through <ul style="list-style-type: none">✓ Staff induction and staff handbook✓ Internal and external training sessions✓ Mandatory online training✓ eHouse staff meetings
Designated Safeguarding Lead	Through <ul style="list-style-type: none">✓ External training
All students	Through <ul style="list-style-type: none">✓ Student induction✓ Student handbook

1.8 Who is who?

PREVENT Office / Training Lead	Sabir Hussain
Safeguarding Officer	Rashad Bokhari

1.9 Quick look

Updating frequency	As and when required / Annually
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2. Access to Fair **Assessment Statement**

2.1 *Scope*

Access to fair assessment statement covers fair assessment for learners studying courses with Education House Leeds. Learners are told of this statement and have access to it on request

2.2 *Policy Statement*

Every learner studying a course with Education House Leeds will be assessed fairly. This means:

- ✓ Assessment will examine what a learner knows and understands, and what they can do.
- ✓ Every student, on every course, will be assessed using the same overall set of exercises and criteria, regardless of the chosen assessment method.
- ✓ Assessments will be standardised across different tutors, assessors and classes to ensure that all learners have been judged against the same standards.
- ✓ A wide range of assessment methods will be used to meet the learner's needs on vocational courses / Training. These may include work products, professional discussion, accreditation of prior learning, questions and answers, simulation, written statements, witness statements and MCQs.
- ✓ Assessments will take place after prior arrangement with all parties, with agreed times and resources.
- ✓ Learners should inform tutors/assessors of their needs and preferences.
- ✓ Every learner has the right to an initial assessment, and if this has been omitted for any reason, they have the right to request one.
- ✓ Tutors and assessors must carry out an initial assessment if they realise it has been omitted.

- ✓ Education House Leeds reserves the right to carry out assessments based on the information on our records of each learner, and adjustments may not be permitted on the day of assessment.
- ✓ Premises where assessments are carried out will have accessibility doors and lifts to enable all learners to have access regardless of disability.

2.3 Appeal Procedure for Learners

If a learner feels they have not been assessed fairly they should use the Appeals and Complaints Policies to appeal the assessment decision of their tutor/assessor. The first step, however, is always to discuss the situation with the tutor/assessor concerned.

Reviewed by: QAT Reviewed on: Revised on:	
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2.4 Quick Look

Statement Review and Revision Frequency	Yearly
Access to Fair Assessment Statement made available to	All tutors, trainers and assessors of Education House Leeds
Related Policies	Assessment Appeals Policy

3. Equality & Diversity Policy

3.1 Purpose

Education House Leeds will ensure legislative compliance with the Equality Act 2010 and fulfil all its legal requirements placed on it under Equality Legislation.

Education House Leeds

- ✓ Will recommend development activities to staff, and review statistical information concerning equality and diversity, including complaints data.
- ✓ Aim to narrow any achievement gaps amongst different groups of learners.
- ✓ Is committed to equality and diversity and work with partners and stakeholders on all equality areas by way of consultation and sharing best practice.

Our aims are to:

- ✓ Create, sustain and celebrate an inspiring working and learning environment which advances equality of opportunity for everyone.
- ✓ Seek to eliminate inequality, prejudice and discrimination.
- ✓ Continually work towards identifying and narrowing achievement gaps.
- ✓ Be representative of our community.
- ✓ Treat all learners, staff and visitors with dignity and respect.
- ✓ Build a positive reputation in respect of equality and diversity.
- ✓ Influence other organisations Education House Leeds encounters with respect to equality and diversity.

Further, we believe valuing equality, diversity and inclusion is key to:

- ✓ Education House Leeds's reputation - good reputation attracts people from all communities, helping to meet service delivery needs.
- ✓ Building relationships with all we encounter - which supports repeat business and community cohesion.
- ✓ Retaining staff - valuing our diverse workforce enables us to recruit and retain the best people for the job.
- ✓ Retaining learners - the promotion of a welcoming and supportive environment is attractive to learners and key to their success.
- ✓ Meeting our legal obligation - effective management of equality, diversity and inclusion limits the risk of legal challenges and costly penalties.

Education House Leeds will seek to ensure that:

It fulfils its duty to eliminate discrimination, harassment, victimisation and other conduct prohibited by the Equality Act, and to advance equality of opportunity and foster good relations, Education House Leeds will:

- ✓ Make reasonable adjustments as far as is reasonably practicable to enable staff and learners to carry out their work and studies.
- ✓ Ensure staff, learners and clients are aware of the value placed upon equal opportunity and that formal investigations and disciplinary action may be taken in the event of any breach of policy.
- ✓ Ensure marketing and publicity materials present appropriate messages and are designed to respect all community groups.
- ✓ Make staff and learners aware of Education House Leeds's Equality and Diversity policy and encourage them to read it.
- ✓ Have inclusive and open recruitment and selection, progression and development processes to encourage our diverse learners and staff to develop and progress.

We will promote Equality and Diversity by:

- ✓ Advancing equality of opportunity and good relations between staff, learners and clients.
- ✓ Embedding equality and diversity throughout all operational activities.
- ✓ Positively encouraging applications from underrepresented groups.
- ✓ Ensuring our schemes of work, lesson plans and content, teaching resources, planning activities, and communications demonstrate sensitivity to issues of diversity and are adapted where necessary.
- ✓ Ensuring that everyone has access to Education House Leeds's courses.

- ✓ Holding accreditations to support equal opportunity standards.
- ✓ Delivering an inclusive approach to celebrating success at qualification presentations and similar events.
- ✓ Reinforcing Education House Leeds's commitment to equality and diversity in its publicity material.

As an employee or learner of Education House Leeds you are responsible for ensuring that:

- ✓ You are aware of your own and Education House Leeds's statutory duties in relation to equality legislation.
- ✓ You refrain from and challenge inappropriate behaviour, whether deliberate or not, by learners, staff and clients.
- ✓ You respond positively to the equality and diversity needs of colleagues and fellow learners and make reasonable adjustments where necessary.

As an employer Education House Leeds monitors and reviews the effectiveness of its Equality and Diversity policies:

- ✓ Through regular equality and diversity meetings with staff.
- ✓ With the involvement and consultation of appropriate groups in its review and ongoing development.
- ✓ By reviewing and implementing best practice observed in other organizations.

It is important that all employees and learners understand that Education House Leeds will not tolerate any form of behavior or activity that discriminates on the grounds of sex, marriage or civil partnership, religion or belief, race, gender reassignment, disability, sexual orientation, age, family responsibilities, nationality or pregnancy or maternity. If an employee or learner is alleged to have discriminated against someone, including harassment, a full investigation will be carried out which may result in summary dismissal or expulsion.

3.2 Cyberbullying

Definition: Cyberbullying refers to the use of electronic communication particularly mobile phones and the internet (social media) to bully, threaten, or intimidate others. This includes but is not limited to, sending abusive messages, spreading false information, or engaging in any form of harmful online behavior that targets an individual or a group. Students may be reluctant to admit to being the victims of cyberbullying'. It can take a number of different forms:

- ✓ Threats and intimidation, harassment or 'cyber-stalking' (e.g. repeatedly sending unwanted texts or instant messages),
- ✓ Sexting (e.g sending and receiving sexually explicit messages, primarily between mobile phones)
- ✓ Vilification/defamation,
- ✓ Exclusion/peer rejection,
- ✓ Impersonation,
- ✓ Unauthorized publication of private information/images and
- ✓ 'Trolling' (abusing the internet to provoke or offend others online). It can be an extension of face-to-face bullying, with technology providing the bully with another route to harass their target.

However, it differs from other forms of bullying in several significant ways:

- ✓ By facilitating a far more extreme invasion of personal space. Cyberbullying can take place at any time and intrude into spaces that have previously been regarded as safe and personal.
- ✓ The potential for anonymity on the part of the bully. This can be extremely distressing for the victim
- ✓ The potential for the bully to play very rapidly to a larger audience so the scale and scope of cyberbullying can be greater than for other forms of bullying.
- ✓ Through the knowledge that the data is in the world-wide domain, disproportionately amplifying the negative effect on the victim, even though the bully may feel his / her actual actions had been no worse than conventional forms of bullying
- ✓ The difficulty in controlling electronically circulated messages as more people get drawn in as accessories. By passing on a humiliating picture or message a bystander becomes an accessory to the bullying.
- ✓ The profile of the bully and target can be different to other forms of bullying as cyberbullying can take place between peers and across generations. Trainers can be victims and age and size are not important.
- ✓ Many cyberbullying incidents can themselves act as evidence, so it is important the victim saves the information.

Education House Leeds's Commitment to Address Cyberbullying:

Education House Leeds recognises the evolving challenges posed by the digital age, including the rise of cyberbullying. In addition to the existing Equality and Diversity policies, the organization is committed to addressing and preventing cyberbullying within its community.

Actions to Address Cyberbullying:

- ✓ **Inclusive Digital Environment:** Education House Leeds will strive to maintain an inclusive digital environment that promotes respect and prevents cyberbullying. This includes fostering positive online interactions and discouraging any form of online harassment.
- ✓ **Awareness and Training:** The organisation will provide training and awareness programs to staff, learners, and clients on recognising and preventing cyberbullying. This includes educating individuals on the potential impact of online actions and promoting responsible online behavior.
- ✓ **Reporting Mechanism:** Education House Leeds will establish a clear and accessible reporting mechanism for instances of cyberbullying. This will ensure that individuals feel safe and supported in reporting any online harassment they may experience or witness.
- ✓ **Investigation and Disciplinary Measures:** In cases where cyberbullying is reported, Education House Leeds will conduct thorough investigations. Disciplinary measures, in line with existing policies, may be taken against individuals found guilty of engaging in cyberbullying. Such measures may include warnings, educational interventions, suspension, or expulsion.
- ✓ **Integration with Existing Policies:** The anti-cyberbullying measures will be integrated into existing policies, including but not limited to the Equality and Diversity policy. This ensures a comprehensive and cohesive approach to fostering a safe and respectful environment both offline and online.

Responsibilities of Employees and Learners Regarding Cyberbullying:

- ✓ **Awareness and Prevention:** Employees and learners are responsible for being aware of the potential for cyberbullying and actively contributing to its prevention. This includes promoting a culture of respect and reporting any observed or experienced cyberbullying.
- ✓ **Digital Citizenship:** All members of the Education House Leeds community are expected to practice good digital citizenship, demonstrating online behavior that aligns with the values of equality, diversity, and inclusion.
- ✓ **Immediate Reporting:** Individuals who experience or witness cyberbullying are encouraged to report it promptly using the established reporting mechanism. Reporting allows for timely intervention and resolution.

Education House Leeds is dedicated to creating a digital environment that reflects its commitment to equality, diversity, and inclusion. The organization believes that addressing cyberbullying is essential to maintaining a positive and respectful community for all members.

3.3 Quick Look

Definition of Equality	Equality is about the rights of learners to have access to, attend, and participate in their chosen learning experience. This should be regardless of ability and/or circumstances. Inequality and discrimination should be tackled to ensure fairness, decency and respect among learners. Equality of opportunity is a concept underpinned by legislation to provide relevant and appropriate access for the participation, development and advancement of all individuals and groups. Equality can be summed up as everyone being different, but having equal rights.
Definition of Diversity	Diversity is about valuing and respecting the differences in learners, regardless of ability and/or circumstances, or any other individual characteristics they may have. If you have two or more learners, you will experience diversity. You are also different from your learners in many ways, and they are different from each other. Therefore, they are entitled to be treated with respect, with their differences acknowledged and needs taken into consideration. Diversity is about respecting individual differences, and people's differences can be varied: Race, Culture, National origin, Region, Gender, Sexual orientation, Age, Marital status, Politics, Religion, Ethnicity, Disability, Socio-economic circumstances, Family, Health, Values, and more.

4. Security & Auditing of Learner's Records & Achievements

Education House Leeds recognizes the importance of complete and secure record keeping and updating. It utilizes paper records lockable chests, drawers and cupboards for record keeping and file storage.

Electronic records are safe guarded by user rights, passwords and firewalls. To ensure the integrity of student records and to minimize the opportunity for the improper use of data, only authorized staff members or senior management personnel have any access to these records.

Each student's record is maintained on paper in uniquely and sequentially numbered files, this number being utilized as the student's registration number providing easy reference to each student's record. All files are tagged with student's name and their registration number and all the data, including admission form, qualification copies, initial assessments and copies of achievements are preserved in that file. These files are maintained in strict number order. Electronic records also have a unique identification number assigned to them. All contact details are updated and checked with the student at the start of every semester.

The roles of the Registrar and Administrator are to maintain all student data & to comply with the Data protection act awarding bodies and the UKBA rules including

- ✓ Students' personal details,
- ✓ Updating students contact & address details every semester
- ✓ Information regarding students' examination and paper handling,
- ✓ Processing individual admissions and updating any change in students' circumstances,
- ✓ Updating records of fees payments and students' funding resources
- ✓ Forwarding all correspondence relating to students' chosen subjects to the course coordinator for final evaluation
- ✓ Informing the students on the commencement date of their classes and notify them of the venue

The above is a non-exhaustive list and the Registrar and Administrators have additional further duties necessary for the fulfillment of their individual roles.

5. Anti-Bullying & Harassment Policy

Education House Leeds will ensure that all students and staff are treated and treat others with dignity and respect, free from harassment and bullying. All staff and students should take the time to ensure they understand what types of behaviour are unacceptable under this policy.

Please note: It is absolutely essential that all reports of bullying or any incident where bullying appears to be taking place must not be ignored but must be acted upon and followed up.

5.1 Scope of the Policy

This policy applies to bullying and harassment and its implications for our students and the ethos of Education House Leeds as a whole. The policy should be read with other relevant Education House Leeds policies, in particular the Education House Leeds's Student Disciplinary Procedure and Equality and Diversity Policy.

5.2 Purpose

The purpose of this policy is to:

- ✓ Clarify for students, staff, parents and employers what bullying is and that bullying in any form is always unacceptable.
- ✓ Explain to the Education House Leeds community some of the reasons why bullying and harassment occur and their impact on individuals and on the Education House Leeds as a whole.
- ✓ Provide a secure, stimulating, positive, respectful and inclusive environment for learning.

5.3 Policy Statement

Education House Leeds will not tolerate any form of bullying or harassment and is committed to eliminating bullying from the organisation. Our vision is to have high standards of teaching and learning which challenge our students to achieve. Our anti-bullying and harassment policy support this by promoting respect and tolerance for each other and for the Education House Leeds. We believe in tackling incidents of bullying by encouraging an environment where individuality is celebrated, and individuals can develop without fear. This involves ensuring that all our students and staff share the same perception of what constitutes bullying, and that students are encouraged to report all incidents of bullying to a member of Education House Leeds staff. We educate our students about the behaviour, attitudes and skills needed to prepare them well for a life in modern Britain.

5.4 Definition of Terms

Education House Leeds adopts the following definition of bullying:

- ✓ 'a physical, psychological or verbal attack against an individual or group of individuals by a person or group of persons, intending to cause physical or psychological harm to the victim'
- ✓ Bullying is the use of aggression with the intention of hurting another person. It is usually conscious and wilful and commonly consists of repeated acts of aggression and/or manipulation.

People can be bullied on the grounds of:

- ✓ Race
- ✓ Gender
- ✓ Sexual orientation
- ✓ Nationality
- ✓ Disability
- ✓ Language
- ✓ Religion
- ✓ Other real or perceived differences
- ✓ Socio-economic status

However, it can also be for no apparent reason. Bullying can take many forms, including:

- ✓ Cyberbullying making use of IT and mobile telephones, i.e., cyber-bullying and text messages
- ✓ Being called names
- ✓ Being teased or taunted
- ✓ Being pushed or pulled around
- ✓ Being hit or attacked
- ✓ Having bags and other possessions taken and thrown around
- ✓ Having rumours spread
- ✓ Being ignored and left out
- ✓ Being forced to hand over money or possessions
- ✓ Being attacked because of religion, colour, ethnicity, language, sexual orientation, disability, gender, class, age, family circumstances, etc.

5.5 Cyberbullying

Cyberbullying may be defined as 'the use of electronic communication, particularly mobile phones and the internet, to bully a person, typically by sending messages of an intimidating or threatening nature: students may be reluctant to admit to being the victims of cyberbullying'. It can take a number of different forms:

- ✓ Threats and intimidation, harassment or 'cyber-stalking' (e.g. repeatedly sending unwanted texts or instant messages),
- ✓ Sexting (e.g sending and receiving sexually explicit messages, primarily between mobile phones)
- ✓ Vilification/defamation,
- ✓ Exclusion/peer rejection,
- ✓ Impersonation,
- ✓ Unauthorized publication of private information/images and

- ✓ 'Trolling' (abusing the internet to provoke or offend others online). It can be an extension of face-to-face bullying, with technology providing the bully with another route to harass their target.

However, it differs from other forms of bullying in several significant ways:

- ✓ By facilitating a far more extreme invasion of personal space. Cyberbullying can take place at any time and intrude into spaces that have previously been regarded as safe and personal.
- ✓ The potential for anonymity on the part of the bully. This can be extremely distressing for the victim
- ✓ The potential for the bully to play very rapidly to a larger audience so the scale and scope of cyberbullying can be greater than for other forms of bullying.
- ✓ Through the knowledge that the data is in the world-wide domain, disproportionately amplifying the negative effect on the victim, even though the bully may feel his / her actual actions had been no worse than conventional forms of bullying
- ✓ The difficulty in controlling electronically circulated messages as more people get drawn in as accessories. By passing on a humiliating picture or message a bystander becomes an accessory to the bullying.
- ✓ The profile of the bully and target can be different to other forms of bullying as cyberbullying can take place between peers and across generations. Trainers can be victims and age and size are not important.
- ✓ Many cyberbullying incidents can themselves act as evidence, so it is important the victim saves the information.

5.6 *Bullying can be subtle, or it can be blatant*

It can cause short-term suffering for the victim or it can go on for years, but it is always damaging and the Education House Leeds will always take it seriously and address it.

5.7 *Ensuring Acceptable Performance and Behaviour*

- ✓ Staff have responsibility for ensuring that students adhere to their commitments as expressed in the Student Code of Conduct. Managers have responsibility for ensuring that staff are effective in their duties and behave according to the ethos and policies of the Education House Leeds.
- ✓ Ensuring the above has, in some circumstances, the danger of being interpreted as intimidation or even bullying. To minimise this possibility, it is important that staff, when raising serious issues, particularly persistent issues, do so clearly but politely and respectfully.
- ✓ Such an approach – particularly when support is offered – is intended to help to minimise the possibility of people feeling intimidated and improve the likelihood that issues will be resolved.

5.8 *Responsibilities*

Everyone in the Education House Leeds must take responsibility for promoting a common anti-bullying approach and all members of the Education House Leeds community are expected to report and challenge incidents of bullying without fear or favour.

5.9 Procedures for Education House Leeds Staff

We expect that staff will:

- ✓ Ensure that all alleged incidents of bullying, perceived or otherwise, are reported to line managers and acted upon.
- ✓ Provide a good role model for students by behaving in a respectful and caring manner with students and colleagues.
- ✓ Undertake training to help them to deal effectively with issues of bullying and harassment.
- ✓ Tackle specific incidents of bullying through the disciplinary procedure, where appropriate.
- ✓ Raise awareness in the classroom of bullying, for example through the programmes and induction.
- ✓ Record, monitor and investigate reported incidences of bullying and harassment in accordance with Education House Leeds procedures.
- ✓ Communicate the Education House Leeds's anti-bullying and harassment policy to students.

5.10 Managing Bullying Incidents

Instructions to staff:

- ✓ Ensure all disclosures about bullying and harassment are taken seriously and treated sensitively. It is important to discuss all possible and desirable strategies with the victim in the first instance and proceed as appropriate.
- ✓ Reassure the student that they have done the right thing in reporting the incident of bullying or harassment and it is important to portray a calm, non-judgmental and positive response to the student.
- ✓ Do not show your own emotions or ask any leading questions. Instead, use restorative questions to ascertain what has happened and capture all the information including who is involved.
- ✓ It is important to be honest with the student – do not promise confidentiality where it cannot be maintained to investigate or resolve the issue.
- ✓ Notes will need to be taken regarding the discussion and the staff member will need to ask the student to complete a statement which must be signed by the student, to declare a true reflection of events. It is important that staff record facts and do not add their own interpretation on the Statement and they must date and sign all documents.
- ✓ If a student decides not to take any further action after reporting the incident the Education House Leeds reserves the right to investigate the incident and pursue an outcome.
- ✓ If the student or staff member decides the matter is best resolved informally, an accurate record should be kept. In some cases, speaking directly with the person concerned can be enough to end the situation. For example, sometimes students do not realise that their conduct is causing offence and explaining this to them is enough to make them rethink their behaviour.
- ✓ If the matter needs to be addressed through a more formal process or there is a serious safeguarding concern this needs to be reported to the Education House Leeds's Safeguarding Lead.
- ✓ If there are allegations of staff bullying or harassment this needs to be forwarded to HR.

Procedure for students

We expect that students will:

- ✓ Support Education House Leeds staff in the implementation of the policy
- ✓ Become involved in the monitoring of the policy
- ✓ Feel confident to challenge and report incidence of bullying or harassment
- ✓ Feel reassured that bullying is taken seriously and is always tackled by the Education House Leeds

5.11 How to report Bullying

- ✓ If you feel you are the victim of bullying or harassment – act promptly and tell someone. This may be your course tutor; Learner Mentor, someone in Student Services or any other member of staff.
- ✓ Restorative questions (an example of restorative questions can be found in the appendix 1 section of this policy along with an example action plan) will be used by staff when speaking to you to ensure a fair process and that you have had the opportunity to have your say. You will be listened to sympathetically and your concerns will be taken seriously.
- ✓ Notes will be taken regarding the discussion and the staff member will ask the student to complete a statement, which must be signed to declare a true reflection of events. All incidents and notes will be recorded and held centrally on Pro-Monitor.
- ✓ As a result of the interview, the Student Disciplinary Procedure may be followed against the alleged bully and follow up interviews will be conducted with the perpetrator.
- ✓ If the bullying could be deemed as criminal or poses a serious threat to the lives of students or the public, the Police will be informed immediately.
- ✓ Confidentiality will be maintained, but it cannot be guaranteed. If a student decides not to take any further action after reporting the incident, Education House Leeds reserves the right to investigate the incident and apply disciplinary sanctions where appropriate.
- ✓ Restorative meetings will be held on some occurrences to explore a resolution where appropriate; on other occasions, an action plan may be introduced as the best course of action.
- ✓ If students would prefer to arrange contact with an external organisation to discuss their concerns, a list of specialist agency details is available with the Safeguarding Lead.

6. Anti-Radicalization & Extremism Policy

6.1 Radicalization and Extremism

Radicalisation is defined as “a process by which an individual or group comes to adopt increasingly extreme political, social or religious ideals and aspirations that:

- ✓ *Reject or undermine the status quo or*
- ✓ *Reject and /or undermine contemporary ideas and expressions of freedom of choice.”*

Extremism is defined as “Vocal, or active opposition to fundamental British Values including democracy, the role of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.”

6.2 Educational establishments

Educational establishments and settings are the front-line agency in any locality. They have the most regular contact with participants. Settings, through their ethos, and through the curriculum are best placed to promote respect, tolerance, and an understanding of our multi-cultural, multi faith society.

The challenge for all educational establishments is to be aware of when the natural tendencies of adults, to challenge and to question, develop into extreme views which promote or encourage hate and/or violent actions towards others on the basis of an ideological belief.

Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

All educational establishments should be safe spaces in which participant can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas. The Prevent duty is not intended to limit discussion of these issues.

Educational establishments should, however, be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues.

All staff should be aware of the issue of radicalization and extremism and the sensitivities that go with it.

6.3 Safeguarding participants against radicalization and violent extremism

The Counter-Terrorism and Security Act 2015 “places a duty on specified authorities, including local authorities and childcare, education and other participant’ service providers to have due regard to the need to prevent people from being drawn into terrorism (the Prevent duty).”

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups. “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” (HM Government Prevent Strategy 2011).

Since the publication of the Prevent Strategy, there has been an awareness of the specific need to safeguard participant, participant and families from violent extremism. There have been attempts to radicalise vulnerable participant and participant to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

Keeping participant safe from these risks is a safeguarding matter and should be approached in the same way as safeguarding participant from other risks. Participant should be protected from messages of all violent extremism including, but not restricted to, those linked to extreme Islamist ideology, or to far Right/Neo- Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

Prevent, in the context of counter-terrorism, is intervention before any criminal offence has been committed with the aim of preventing individuals or groups from committing crimes. The current threat to the UK is severe and very likely. The biggest threat is from ISIL but there is a significant growth in far-right activity in the UK. The groups have a wide appeal and recruit via relationships and social contact. There is not a single profile but vulnerable participant is at a higher risk. At Education House, Leeds all staff and teachers and support staff will be briefed on the prevent strategy with supporting documents.

6.4 Risks

Participants can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These can include through the influence of family members or friends and/or direct contact with extremist groups and organisations or, increasingly, through the Internet. This can put a participant at risk of being drawn into criminal activity and has the potential to lead to them suffering significant harm. This may take the form of a “grooming” process where the vulnerabilities of a participant are exploited to form an exclusive friendship which draws the young person away from other influences that might challenge the radical ideology.

The risk of radicalisation is the product of a number of factors and identifying this risk requires that practitioners exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified. On-line content, in particular social media, may pose a specific

risk in normalising radical views and promoting content that is shocking and extreme; participants can be trusting and not necessarily appreciate bias that can lead to them being drawn into these groups and adopt their extremist views.

There is some evidence that specific groups such as young Muslim women have been targeted for radicalization and grooming, leading to attempts to travel to the Middle East and place themselves at risk.

6.5 *Indicators*

There is no standard template for radicalization, but issues that may make an individual vulnerable to radicalization can include:

- ✓ **Identity Crisis** - Distance from cultural / religious heritage and uncomfortable with their place in the society around them;
- ✓ **Personal Crisis** - Family tensions; sense of isolation; adolescence; low self- esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging;
- ✓ **Personal Circumstances** - Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- ✓ **Unmet Aspirations** - Perceptions of injustice; feeling of failure; rejection of community values;
- ✓ **Criminality** - Experiences of imprisonment; previous involvement with criminal groups.

However, those closest to the individual may first notice the following changes of behavior:

- ✓ Use of inappropriate language;
- ✓ Possession of violent extremist literature;
- ✓ Behavioral changes;
- ✓ The expression of extremist views;
- ✓ Advocating violent actions and means;
- ✓ Association with known extremists;
- ✓ Seeking to recruit others to an extremist ideology.

It should be borne in mind that someone radicalized over the internet may exhibit little change in behavior. Practitioners should ensure that assessments examine behavior in the family and the social context of the participant, and include information about the participant's peer group and conduct and behavior at Education House, Leeds. Holding radical or extreme views is not illegal, but inciting a person to commit an act in the name of any belief is in itself an offence. The safeguarding aim should be to engage with the participant and, if there is a cause for concern, to ensure that such views are constructively challenged before an offence is committed.

6.6 Protection and Action to be taken

Any member of staff identifying concerns about a student should report them to Sabir Hussain, the PREVENT officer) who will discuss these concerns with the relevant authority. Education House, Leeds will not be responsible for any action taken from this point, and involved parties will only be informed at the say of the authorities.

Participants who report concerns about other participants will, as far as possible, not be identified outside of the management for their own safety. It will be the same for staff or associates that raise any concerns, though any making an accusation may need to be available for police/agency questioning. False accusations of any kind by anyone will be treated very seriously and may result in termination of registration.

Consideration will be given to the possibility that sharing information with others may increase the risk to the participant and therefore may not be appropriate. Wherever possible, the response will be appropriately and proportionately usually in conjunction with other local agencies and partners.

6.7 Who is who?

PREVENT Office	Sabir Hussain
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6.8 Quick look

Updating frequency	As and when required / Annually
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7. Conflict of Interest Policy

7.1 Purpose

The purpose of this policy is to provide guidance to relevant individuals on handling possible conflicts of interest that may arise at Education House Leeds as training and Education provider, assessor and moderator of accredited units and qualifications.

This policy applies to all staff and other individuals whenever they interact or potentially interact with any of Education House Leeds's operations.

This policy:

- ✓ Defines what is meant by conflict of interest sets out the roles and responsibilities for managing conflict of interest
- ✓ Illustrations of potential conflict of interest situations.

7.2 *Scope*

It is the policy of Education House Leeds that Trainer, Tutors, Assessors and Internal Verifiers acting on behalf of Education House Leeds must be free from conflicts of interest that could adversely affect their judgment or objectivity to the organisation in conducting business activities and assignments.

College recognizes that Trainer, Tutors and assessors may take part in legitimate financial, business, charitable and other activities outside of their recognised roles at Education House Leeds, but any potential conflict of interest raised by those activities must be acknowledged, disclosed, and in relevant cases properly managed.

It is the responsibility of each individual to recognize situations in which they have a conflict of interest, or might reasonably be seen by others to have a conflict; to disclose this conflict and to take such further steps as may be appropriate and set out in more detail under the procedure below.

7.3 *Definition of conflict of interest*

A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. Conflicts of interest can arise in a variety of circumstances in relation to awarding organisation activity, for example:

- ✓ Where the training delivery function and the awarding function rest within one organisation and the functions are not strictly delineated
- ✓ When an individual has a position of authority in one organisation which conflicts with his or her interests in another organisation
- ✓ When an individual has personal interests that conflict with his/her professional position
- ✓ A conflict of interest may generally be defined as a conflict between the official responsibilities of a Trainer, Tutor, assessor, and internal verifier and any other interests the particular individual may have and as such could compromise or appear to compromise their decisions
- ✓ A person who is connected to the development, delivery or award of qualifications by the organisation has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that development, delivery or award in accordance with the awarding organisations conditions of recognition
- ✓ An informed and reasonable observer would conclude that either of the above situations was the case
- ✓ Trainer, Tutors and assessors working with a business that is in direct competition to Education House Leeds
- ✓ Trainer, Tutors and assessors participating in the appointment, supervision evaluation or
- ✓ assessment of a person with whom the person, has close or familial ties
- ✓ Trainer, Tutors and assessors having a close or familial relationship with the registered learner, or learners' family whilst being involved in decisions about the outcome of their accreditation or qualification or where the person whose remuneration is in part determined by the outcome of the assessment.

7.4 Roles and responsibilities

All relevant staff undertaking assessment ('assessors'), moderation ('moderators' or 'verifiers') and other individuals have a responsibility to be aware of the potential for a conflict of interest.

Such situations must be carefully managed to ensure that any conflict of interest does not detrimentally impact on the standards of Education House Leeds and its awarding and inspecting bodies as well as public confidence.

It is the duty of all Trainer, Tutors and assessors to disclose any actual or potential conflict of interest, to their line managers or the Director, in writing. The information submitted is then evaluated to identify if any further action is required and a written record of the outcome of the evaluation is kept and a copy will be provided to the concerned individuals.

If the individual concerned has any changes to their declared circumstances, they must inform their line manager immediately in writing, so that the conflict of interest can be evaluated, and the register updated.

8. Data Protection Policy

8.1 Obligation (s) and Purpose of policy

Education House Leeds

- ✓ Must follow Data Protection Principles, which are set out in the 1998 Data Protection Act.
- ✓ Must comply with legal obligations around health and safety, funding, awarding bodies and government. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully.
- ✓ Needs to keep information about its learners, employees and clients to monitor its performance.
- ✓ Also needs to process information to recruit and pay staff, organise courses, and complete examination registrations.

Policy

- ✓ Personal data of staff, learners and potential learners must be:
- ✓ Collected and used fairly and lawfully.
- ✓ Only used to the purpose it was collected for.
- ✓ Relevant and not excessive for those purposes.
- ✓ Accurate and kept up-to-date.
- ✓ Kept for no longer than is necessary.
- ✓ Used in accordance with the data subject's rights.
- ✓ Kept safe from unauthorised access, accidental loss or destruction.
- ✓ Not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.

8.2 **Learner's responsibilities**

Learners must ensure that all personal data provided to Education House Leeds is accurate and up-to-date. Any changes in provided information (e.g. change of address, status or contact no. and etc) must be disclosed to Education House Leeds.

8.3 **Examinations**

Learners are entitled to information about their marks for coursework and examinations as part of their tutorial support. However, this may take longer than other information to provide. Education House Leeds may withhold certificates, accreditation or references if the full course fees have not been paid, or company equipment is not returned.

8.4 **Employees' responsibilities and Data Security**

Information given to Education House Leeds in relation with their employment must be accurate and up-to-date. Any changes in given information (e.g. change of address, status or contact no. and etc) must be reported to Education House Leeds.

When, as part of their responsibilities, staff collect information about others (e.g. student's course work, opinions about ability, references to other academic institutions, or details of personal circumstances) they must comply with the staff guidelines.

Staffs are responsible for ensuring that personal data they hold is stored securely. For example:

- ✓ Kept in a locked filing cabinet, or In a locked drawer
- ✓ If it is computerised, be password protected, or Kept only on disk, which is itself kept securely
- ✓ Is not generally taken home. (Staff are responsible for the security of data they do take home).
- ✓ Personal information is not disclosed either orally or in writing to any unauthorised third party.
- ✓ Mobile devices used for work purposes are password protected.
- ✓ Work related data on personal devices is removed when no longer needed.

Unauthorized disclosure of data will usually be a disciplinary matter, and may be considered gross misconduct in some cases. It may also result in a personal liability for the individual staff member.

It is the condition of employment that employees abide by Education House Leeds's rules and policies. Failure to follow the Data Protection Policy (DPP) can result in disciplinary proceedings.

8.5 **Rights to Access Information**

Staff and learners have the right to access any personal data kept about them on computer or file. Any person who wishes to exercise this right should contact the Designated Data Protection Controller. Data requests should be made in writing. Education House Leeds will make a charge of £10 on each occasion that access is requested. Education House Leeds aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 30 days.

8.6 Consent

Education House Leeds can sometimes only process personal data with the consent of the individual. Often, if the data is sensitive, consent must be obtained. Agreement to Education House Leeds processing some types of personal data is a condition of acceptance of a learner onto a course, and a condition of employment for staff. This includes information about previous criminal convictions in accordance with the Rehabilitation of Offenders Act 1974.

Some jobs or courses will bring the applicants into contact with children, including young people between the ages of 16 and 18. Education House Leeds 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. Education House Leeds also has a duty of care to all staff and learners, and must therefore ensure staff do not pose a threat or danger to others. Therefore, all prospective staff and learners will be asked to consent to their data being processed when an offer of employment is made or a course offered. Refusal may result in the offer being withdrawn.

8.7 Retention of Data

Education House Leeds will keep some forms of information for longer than others. Data on learners, including any information on health, race or disciplinary matters, will be destroyed after ten years. Some information on academic achievements will be retained.

8.8 Quick Look

Designated Data Protection Controller	Mahboob Ahmad Managing Director E: mahboob@ehouse.org.uk M: 07455222161
Followers of DPP*	Education House Leeds Employees of Educations House Leeds Learners of Education House Lees
Contact Person for further questions and concerns on DPP*	Designated Data Protection Controller
Responsible for implementation of DPP*	Designated Data Protection Controller
Contact Person in case of breach of DPP*	Designated Data Protection Controller
Related Policies	Document Retentions and Secure Storage Policy
Data Protection Act 1998	The function of The Data Protection Act is to ensure the privacy and protection of rights of individuals that are identifiable and living. It works to ensure that personal data is not accessed or handled without the consent of the individual in all circumstances unless extraneous and within the guidelines of the Act.

9. Disability Discrimination Policy

9.1 Purpose

The purpose of the Disability Discrimination Policy is to ensure that Education House Leeds complies with the Disability Discrimination Act 2005 (Disability Discrimination (Northern Ireland) Order 2006) and to ensure that disabled persons falling within the definition of the Act/Order are treated equally and fairly.

9.2 Scope

The Disability Discrimination Policy covers all learners, staff and applicants. This also covers learners/employees who become disabled during their training/employment.

Policy: Education House Leeds

- ✓ Is committed to maintain and manage a diverse work force and no learner or employee shall receive less favourable treatment because of disability.
- ✓ Fully supports the principle of equal opportunities in employment and recruitment of learners and opposes all forms of unlawful or unfair discrimination on the grounds of disability.

9.3 Actions / Activities to promote Disability Discrimination Policy

Education House Leeds will

- ✓ Provide training and guidance to relevant staff to ensure that the risk of possible discriminatory attitudes affecting decisions are minimised.
- ✓ Ensure that people with disabilities will receive equal treatment in learning and development.
- ✓ Take account of any reasonable adjustments a disabled member of staff needs to perform the requirements of their post and will take account of these in setting and measuring the objectives and outcomes for that individual.
- ✓ Try to introduce different forms of communication to enable disabled learners to express their views and hear the views of others.
- ✓ Encourage learners with disability to involve in the continuous review and development of this policy by letting them engage to give their comments and suggestions.
- ✓ Carefully monitor bullying for the personal wellbeing of disabled students.
- ✓ Promote positive attitudes towards disability whenever possible, ensuring staff and other learners have respectful attitudes towards the disabled

9.4 Complaints of Disability Discrimination

Education House Leeds will treat seriously all complaints of unlawful disability discrimination made by employees, learners and others. All complaints will be investigated in accordance with the company’s grievance or complaints procedure, and the complainant will be informed of the outcome in line with these procedures. We will also monitor and record the number and outcomes of complaints of disability discrimination.

9.5 Monitoring

Education House Leeds will monitor and record equal opportunities information about disabled students on the basis of their individual disability. It will store disability information as confidential personal data and restrict access to this information. Disability information will be used exclusively for the purposes of equal opportunities monitoring and will have no bearing on opportunities or benefits.

9.6 Quick Look

Responsibility of Protection and Implementation of DDP*	Education House Leeds and its employees
Responsible Person to Adhere DDP*	Employees and Learners of Education House Leeds
Responsible Authority of Reviewing and Monitoring of DDP* to ensure its implementation and Effectiveness	Education House Leeds
Policy Review and Revision Frequency	Yearly / As or when required by new law
Definition of Disability according to Disability Discrimination Act 2005 / Disability Discrimination (Northern Ireland) Order 2006)	<p>A person who has a physical or mental impairment which has a substantial and long-term adverse effect on his or her ability to carry out normal day to day activities.</p> <p>The definition includes a wide range of impairments such as dyslexia, autism, speech and language impairments, and Attention Deficit Hyperactivity Disorder. Rapid Results Training will ensure its attitude is conducive to disclosure, and will ensure learners feel comfortable about acknowledging an impairment or health condition. Any information will be used sensitively and confidentially and used to improve opportunities and outcomes. In the event of evacuation of a classroom, tutors will personally allocate themselves to ensure disabled people are helped to the designated meeting point.</p>

10. Document Retention & Secure Storage Policy

10.1 Purpose

This policy concerns the retention of documents and records received, created, or maintained by Education House Leeds in connection with its business. This policy is designed:

- ✓ For effective record retention to preserve our archival records; to enhance compliance with laws and regulations;
- ✓ To eliminate accidental or innocent destruction of records;
- ✓ To facilitate Education House Leeds's operations by promoting efficiency and maximizing the availability of valuable storage space.

10.2 Scope

This policy applies to all records and documents, including both original documents and reproductions generated in the course of Education House Leeds's operations. It applies to records stored electronically as well as paper records.

Education House Leeds recognizes the importance of complete and secure record keeping and updating. It utilizes paper records lockable chests, drawers and cupboards for record keeping and file storage. Electronic records are safe guarded by user rights, passwords and firewalls.

10.3 Records Access Procedure

To ensure the integrity of student records and to minimize the opportunity for the improper use of data, only authorized staff members or senior management personnel have any access to these records.

10.4 Records Management System

Each student's record is maintained on paper in uniquely and sequentially numbered files, this number being utilized as the student's registration number providing easy reference to each student's record. All files are tagged with student's name and their registration number and all the data, including admission form, qualification copies, initial assessments and copies of achievements are preserved in that file. These files are maintained in strict number order. Electronic records also have a unique identification number assigned to them. All contact details are updated and checked with the student at the start of every semester.

The roles of the Registrar and Administrator are to maintain all student data & to comply with the Data protection act, awarding bodies and the UKBA rules including

- ✓ Students' personal details,
- ✓ Updating students contact & address details every semester
- ✓ Information regarding students' examination and paper handling,
- ✓ Processing individual admissions and updating any change in students' circumstances,
- ✓ Updating records of fees payments and students' funding resources
- ✓ forwarding all correspondence relating to students' chosen subjects to the course coordinator for final evaluation
- ✓ informing the students on the commencement date of their classes and notify them of the venue
- ✓ The above is a non-exhaustive list and the Registrar and Administrators have additional further duties necessary for the fulfillment of their individual roles.

10.5 Document Retention Schedule

Document / Record	Retention Period
Participant application forms	2 Years
Staff reviews	2 Years
Class lists	2 Years
Learner attendance forms	2 Years
Invoices	6 Years
Staff/learner liaison meetings	2 Years
Learner case files	2 Years
Diary entries for appointments	1 year
Timetabling information	2 Years
Marketing information	2 Years
Learner self-assessment forms	2 Years
Fees and charges information	7 Years
Financial forecasts	7 Years
Capital and revenue budgets	7 Years
Purchase orders	7 Years
Delivery notes	4 Years
Sales invoices	7 Years
Credit notes	7 Years
Remittances	7 Years
BACS reports	7 Years
Payroll payments	7 Years
Staff expense claims	7 Years
Corporation tax returns	7 Years
Annual appraisal records	2 Years
Salary records	7 Years

10.6 Disaster Planning and Preparedness

Education House Leeds records will be stored in a safe, secure, and accessible manner. Documents and financial files that are essential to keeping the business operating in an emergency are to be duplicated and backed-up on a regular schedule.

10.7 Quick Look

Compliance	Non-compliance actions / activities of employees may result in disciplinary action.
Definition of Document or Record	'Documents' or 'Records' – when used in this policy, includes any original documents or reproductions created, received, or maintained by Education House Leeds and its staff in connection with its business, regardless of physical form (hard copy or electronic form, including email).
Definition of Archival records	'Archival records' – An original record that is inactive, not required to be retained in the office in which it originated or was received, and has permanent or historic value.
Definition of Financial Records	'Financial Records' – any records containing social security number, financial account information, tax returns, asset statements, bank or credit card account numbers, income and/or credit information, payment card transactional information especially cardholder data, or any other records containing 'personally-identifiable financial information' regarding learners, staff, alumni and third parties. Financial Records also include the documentation for all Education House Leeds business transactions, it's system of accounting and records of official financial statements.
Policy Review and Revision Frequency	Yearly
Responsible person to implement the policy	Administrator / Managing Director

11. Equal Opportunities Policy

11.1 Statement

The aim of this policy is to communicate the commitment of the Director and senior management team to the promotion of equality of opportunity in Education House Leeds.

It is our policy to provide equality of opportunity in regards to employment and service delivery equally to all, irrespective of any personal characteristics:

- ✓ Gender, including gender reassignment
- ✓ Marital or civil partnership status
- ✓ Having or not having dependants
- ✓ Religious belief or political opinion
- ✓ Race (including colour, nationality, ethnic or national origins, being a Traveller)
- ✓ Disability
- ✓ Sexual orientation
- ✓ Age.

We are opposed to all forms of unlawful and unfair discrimination. All job applicants, employees, students / learners and others who work for us or are recipients of our services will be treated fairly and will not be discriminated against on any of the above grounds. All students will be treated fairly and equally.

Decisions about recruitment and selection, promotion, training, service delivery or any other benefit will be made objectively and without unlawful discrimination. We recognise that the provision of equal opportunities in the workplace is not only good management practice, it also makes sound business sense. Our equal opportunities policy will help all those who work for us to develop their full potential and the talents and resources of the workforce will be utilised fully to maximise the efficiency of the organisation.

11.2 Scope

The Equal Opportunities Policy applies to all who work for Education House Leeds, this includes:

- ✓ Job applicants and potential applicants
- ✓ Employees
- ✓ Contract workers
- ✓ Agency workers
- ✓ Trainee workers and students on placements
- ✓ Volunteer workers
- ✓ Former employees

11.3 *Our Values*

The values of Education House Leeds are:

- ✓ ***Integrity***
We speak and act truthfully, admit our mistakes & honour our commitment
- ✓ ***Respect***
We value learners and colleagues as individuals, celebrating and accommodating both differences and similarities and encouraging diversity, originality and innovation
- ✓ ***Fairness***
We treat students and colleagues fairly, provide opportunities for individual success, apply rules with equity and expect the same in return
- ✓ ***Openness***
We share information, ideas and feelings; listen carefully, speak forthrightly, respect diverse views and participate productively in dialogue
- ✓ ***Enjoyment***
We take our learning and work seriously and ourselves lightly
- ✓ ***High Expectations***
We have high expectations of ourselves, our learners, our colleagues and our partners and support each other to meet them

11.4 *Equality Commitments*

We are committed to:

- ✓ Promoting equality of opportunity for all persons
- ✓ Promoting a good and harmonious working environment in which all persons are treated with respect
- ✓ Preventing occurrences of unlawful direct discrimination, indirect discrimination, harassment and victimisation.
- ✓ Fulfilling all our legal obligations under the equality legislation and associated codes of practice.
- ✓ Complying with our own equal opportunities policy and associated policies
- ✓ Taking lawful affirmative or positive action, where appropriate
- ✓ Regarding all breaches of equal opportunities policy as misconduct which could lead to disciplinary proceedings.

11.5 *Implementation*

The Director has specific responsibility for the effective implementation of this policy. Each manager and supervisor also have responsibilities and we expect all our employees to abide by the policy and help create the equality environment which is its objective.

In order to implement this policy, we shall:

- ✓ Communicate the policy to employees, job applicants and relevant others.
- ✓ Incorporate specific and appropriate duties in respect of implementing the equal opportunities policy into job descriptions and work objectives of all staff.
- ✓ Provide equality training and guidance where appropriate, including training on induction and management courses.
- ✓ Ensure that those who are involved in assessing candidates for recruitment or promotion will be trained in non-discriminatory selection techniques

- ✓ Obtain commitments from other persons or organisations such as other institutions working in partnership or in collaboration that they too will comply with the policy in their dealings with our organisation and our workforce
- ✓ Ensure that adequate resources are made available to fulfil the objectives of the policy.

The effectiveness of our equal opportunities policy will be reviewed at least annually and action taken as necessary.

11.6 **Complaints**

Employees who believe that they have suffered any form of discrimination, harassment or victimisation are entitled to raise the matter through the Complaints Procedure. All complaints of discrimination will be dealt with seriously, promptly and confidentially.

Every effort will be made to ensure that employees who make complaints will not be victimised. Victimisation will result in disciplinary action and may warrant dismissal.

12. **General Data Protection Regulations (GDPR) Policy**

12.1 **Obligation (s) and Purpose of policy**

To comply with GDPR, Education House Leeds must embed six privacy principles within their operations:

- ✓ **Lawfulness, fairness and transparency**
Transparency: Tell the subject what data processing will be done.
Fair: What is processed must match up with how it has been described.
Lawful: Processing must meet the tests described in GDPR [article 5, clause 1(a)].
- ✓ **Purpose limitations**
 Personal data can only be obtained for “specified, explicit and legitimate purposes” [article 5, clause 1(b)]. Data can only be used for a specific processing purpose that the subject has been made aware of and no other, without further consent.
- ✓ **Data minimization**
 Data collected on a subject should be “adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed” [article 5, clause 1(c)]. In other words, no more than the minimum amount of data should be kept for specific processing.
- ✓ **Accuracy**
 Data must be “accurate and where necessary kept up to date” [article 5, clause 1(d)]. Baselining ensures good protection and protection against identity theft. Data

holders should build rectification processes into data management / archiving activities for subject data.

✓ ***Storage limitations***

Regulator expects personal data is “kept in a form which permits identification of data subjects for no longer than necessary” [article 5, clause 1(e)]. In summary, data no longer required should be removed.

✓ ***Integrity and confidentiality***

Requires processors to handle data “in a manner [ensuring] appropriate security of the personal data including protection against unlawful processing or accidental loss, destruction or damage” [article 5, clause 1(f)].

These 6 principles give a top-level overview of the areas covered by the new regulation, however they do not delve into nuances of consent and other articles of GDPR, nor the complexities of data flow mapping, lineage and coordination activities associated with implementing a programme to meet GDPR compliance.

Education House Leeds:

- ✓ Must follow the regulations set-out in the General Data Protection Regulations (GDPR) 2018.
- ✓ To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully.
- ✓ Needs to keep information about its learners, employees and clients to monitor its performance.
- ✓ Also needs to process information to recruit and pay staff, organise courses, and complete examination registrations.

12.2 Policy

Personal data of staff, learners and potential learners must be:

- ✓ Collected and used fairly and lawfully.
- ✓ Only used to the purpose it was collected for.
- ✓ Relevant and not excessive for those purposes.
- ✓ Accurate and kept up-to-date.
- ✓ Kept for no longer than is necessary.
- ✓ Used in accordance with the data subject’s rights.
- ✓ Kept safe from unauthorised access, accidental loss or destruction.
- ✓ Not be transferred to a country outside the European Economic Area, unless that Country has equivalent levels of protection for personal data.

12.3 Learner’s responsibilities

Learners must ensure that all personal data provided to Education House Leeds is accurate and up-to-date. Any changes in provided information (e.g. change of address, status or contact no. and etc.) must be disclosed to Education House Leeds.

12.4 Examinations

Learners are entitled to information about their marks for coursework and examinations as part of their tutorial support. However, this may take longer than other information to provide. Education House Leeds may withhold certificates, accreditation or references if the full course fees have not been paid, or company equipment is not returned.

12.5 Employees' responsibilities and Data Security

Information given to Education House Leeds in relation with their employment must be accurate and up-to-date. Any changes in given information (e.g. change of address, status or contact no. etc.) must be reported to Education House Leeds immediately.

When, as part of their responsibilities, staff collect information about others (e.g. student's course work, opinions about ability, references to other academic institutions, or details of personal circumstances) they must comply with the staff guidelines.

Staff are responsible for ensuring that personal data they hold is stored securely. For example:

- ✓ Kept in a locked filing cabinet, Or in a locked drawer;
- ✓ If it is computerised, be password protected, or kept only on disk, which is itself kept securely locked away;
- ✓ Is not generally taken home – (staff must ensure the same levels of security and confidentiality when at home and are responsible for the security of data they do take home) – the same levels of confidentiality must be maintained at home as they are at work;
- ✓ Personal information is not disclosed either orally or in writing to an authorized third party;
- ✓ Electronic devices including laptops, tablets and mobile devices used for work purposes are password protected;
- ✓ Work related data on personal devices is removed when no longer needed.

Unauthorized disclosure of data will usually be a disciplinary matter, and may be considered gross misconduct in some cases. It may also result in a personal liability for the individual staff member. *It is the condition of employment that employees abide by Education House Leeds's rules and policies. Failure to follow the GDPR Policy can result in disciplinary proceedings.*

12.6 Rights to Access Information

Staff and learners have the right to access any personal data kept about them on computer or file. Any person who wishes to exercise this right should contact the Designated Data Protection Officer. Data requests must be made in writing. Education House Leeds aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 30 days.

12.7 Consent

Education House Leeds can only process personal data with the consent of the individual. If the data is sensitive, consent must be obtained. Agreement to Education House Leeds processing some types of personal data is a condition of acceptance of a learner onto a course, and a condition of employment for staff. This includes information about previous criminal convictions in accordance with the Rehabilitation of Offenders Act 1974.

Some jobs or courses will bring the applicants into contact with children, including young people between the ages of 16 and 18. Education House Leeds 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. Education House Leeds also has a duty of care to all staff and learners, and must therefore ensure staff do not pose a threat or danger to others. Therefore, all prospective staff and learners will be asked to consent to their data being processed when an offer of employment is made or a course offered. Refusal may result in the offer being withdrawn.

12.8 Retention of Data

Education House Leeds will keep some forms of information for longer than others. Data on learners, including any information on health, race or disciplinary matters, will be destroyed as per our data retention schedule set out below (and also set out in the Document Retention Section of the Document Retention & Secure Storage Policy)

Policy. Information on academic achievements will be retained as set-out in our data retention schedule.

12.9 Quick Look

Designated Data Protection Controller	Mahboob Ahmad Managing Director E: mahboob@ehouse.org.uk M: 07455222161
Followers of GDPRP*	Education House Leeds Employees of Educations House Leeds Learners of Education House Lees
Contact Person for further questions and concerns on GDPRP*	Designated Data Protection Controller Mahboob Ahmed
Responsible for implementation of GDPRP*	Designated Data Protection Controller Mahboob Ahmed
Contact Person in case of breach of GDPRP*	Designated Data Protection Controller Mahboob Ahmed
Related Policies	Document Retentions and Secure Storage Policy

13. Health & Safety Policy

13.1 *Obligation (s) and Purpose of policy*

Education House Leeds is committed to follow Health and Safety at Work Act 1974 and its primary aim is to provide, so far as is reasonably practicable, a safe, incident-free and healthy place of work and learning environment for staff and learners.

13.2 *Staff*

All staff will be made aware of their legal responsibilities under Section 7 of the Act. They must take reasonable care for their own health and safety and that of others who may be affected by their acts. They are required to cooperate with their employer on health and safety matters. Regulation 14 of the Management of Health and Safety Regulations (1999) requires all staff to report without delay to their employer or a colleague with health and safety responsibilities any work situation that could give rise to serious and imminent danger to health and safety and also any noted shortcomings in the employer's protection arrangements for health and safety.

13.3 *Staff and Learners*

Staff and learners have a duty under Section 8 of the Act not to interfere with or misuse anything provided by Education House Leeds in the interests of health and safety.

13.4 *Policy*

It is Education House Leeds's policy to comply with all relevant statutory and regulatory provisions and to take such additional measures as it considers necessary. To achieve this it will, as a minimum, operate to legal requirements and establish good practice and will as far as is reasonably practicable:

- ✓ Create and maintain an organisational structure and promote a positive health and safety culture which supports risk control at all levels.
- ✓ Manage its activities in such a way as to ensure the health, safety and welfare of all staff and learners, and to maintain a safe and healthy environment, with suitable and adequate facilities and arrangements.
- ✓ Identify and control risk as an effective approach to injury, work related ill-health (including stress) and loss prevention.
- ✓ Provide and maintain equipment that is suitable for their intended use; safe and without risk to health, with absence of risks in their use, handling, storage and transport.
- ✓ Provide the necessary information, instruction, training and supervision to ensure the health and safety of all employees and learners.
- ✓ Ensure classrooms and premises used by Education House Leeds are safe and without risk to health, and have means of safe access.
- ✓ Promote through consultation and other means, the active involvement of staff and learners in the development, promotion, implementation and monitoring of health, safety and welfare.

- ✓ Develop an understanding of risk control and ensure that risk assessments are carried out as required by the Health and Safety at Work Regulations (1999) and other regulations.
- ✓ Promote a culture of individual responsibility for health and safety. Seek specialist advice on health and safety matters when necessary.
- ✓ Investigate thoroughly all accidents and unusual occurrences affecting health and safety.
- ✓ Seek to make progressive improvements in health and safety.

Education House Leeds is conscious of the external environment that may be affected by its activities and will pay full regard to the implications of the Environmental Protection Act 1990 and, in particular the Duty of Care as regards waste, pollution and energy conservation.

13.5 Quick Look

Designated Health and Safety Office	Director
Recipients of Policy	All staff and Learners in Inductions
Policy Review and Revision Frequency	Annually
Reviewed by	QAT
Last Review and Revision on	11 th Sep 2017

14. Internal Review & Quality Assurance Policy

14.1 Statement

This Quality Review and Assurance policy outlines our belief and commitment to ensure that ongoing quality improvement is an integral part of our organisation. Education House Leeds 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 attainment through the standards of our work. Education House Leeds aims to be a top choice for high quality experiential-based management / business administration training for domestic and international participants.

14.2 Purpose

The purpose of the Internal Review and Quality Assurance Policy is to ensure such continuous improvement through a process of self-evaluation and action planning. The

Quality Assurance Policy and associated procedures will involve all staff and the management of the process will be through the existing organisational structure.

14.3 **Quality Review and Standardization (QRS) Meetings**

Quality Review and Standardization Meetings (QRS Meetings) will help to improve the

- ✓ Quality of teaching
- ✓ Experience of learners, teachers, assessors and ehouse management staff
- ✓ Repute and image of Education House Leeds (ehouse)

QRS Meetings will be conducted according to the following details:

Attendees	Education House Leeds Staff
Called and Managed by	Programme Lead
Frequency	4 Times a year (April, July, October, January)

14.4 **Purpose of QRS Meetings**

- ✓ Ensure courses are effective and achieving their aims and objectives
- ✓ Clearly define roles and responsibilities of staff
- ✓ Review all participants' and staff feedback forms
- ✓ Compile areas quality improvement
- ✓ Sharing best practices
- ✓ Compliance with relevant codes of practice
- ✓ Ensuring the implementation of policies and procedures
- ✓ Implement changes and developments
- ✓ Provide a consistent experience and knowledge for all Participants
- ✓ Embark on continuous development of teaching / training and administrative staff
- ✓ Maintaining and sustaining regulatory authorities
- ✓ Continuous review and improvement of the audit trail of feedback

14.5 **Process**

The quality assurance procedures will be founded in a process of regular self-evaluation through the involvement of all relevant staff via internal audits and observations, in addition to staff and participant feedback.

The quality procedures will seek the views and perceptions of learners and other stake holders who receive, benefit from and select our training solutions.

Wherever appropriate, the procedures will promote the identification of quality standards and performance indicators against which performance can be measured, evaluated and improved.

14.6 **Responsibility for Implementation**

The overall responsibility and management of the Internal Review and Quality Assurance procedures lies with the Programme lead / Internal quality assurance officer. However, all staff (MD, Principal, trainers and support staff) are responsible for the implementation of the Internal Review and Quality Assurance Policy.

The Programme lead / Internal quality assurance officer is responsible for an annual review of the policy.

It is the responsibility of all to engage positively in that review and ensure implementation.

14.7 Quality Assurance Focus

- ✓ To encourage continuous improvement in the quality of all training programmes and associated development solutions, thereby making learning an enjoyable activity and through this, increasing learner retention and the achievement of learning aims.
- ✓ To develop and maintain a diverse range of programmes that will be appropriate across the entire participant sector which provide learners with techniques, processes and structures that will enable them to not just understand but in particular to perform their roles at a higher standard.
- ✓ To provide information and feedback from all interactions with our clients and participants that enables continuous updates and improvements to our programmes.
- ✓ To establish standards and monitoring procedures for providing a supportive and accessible range of programs to all learners.
- ✓ To review regularly the performance, training and needs of all staff.
- ✓ To encourage continual professional development and to offer training and development to individuals from induction and throughout their employment.
- ✓ To monitor and evaluate performance and developmental needs through regular one to one reviews.

14.8 Quality Assurance for Participants

Learner feedback will be sought, reviewed and acted upon when relevant to the improvement of the quality of any programme.

The quality of our development programmes is dependent upon learners engaging with the experiential nature of our programmes and applying techniques that we have taught to them once they are back in their workplace. Education House Leeds will therefore explore, develop, deliver and support a range of processes that will support and encourage learners to take maximum advantage of the experiential nature of the development solutions.

These forms of training delivery will be regularly reviewed.

14.9 Actions

Highlight issues that need consideration by Education House Leeds.

The results of the quality control monitoring as stated above, will be used to:

- ✓ Action plan for improvement within Education House Leeds.
- ✓ Feedback on actions taken will be shared via our website.
- ✓ Identify new initiatives and solutions that will improve the quality of development that we bring to our participants.

15. Privacy Policy

15.1 General Statement

Education House Leeds ('we', 'us') is committed to protecting the rights and freedom of data subjects safely and securely processing their data in accordance with all of our legal obligations.

We are committed to protecting and respecting your privacy and this Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting our websites you are accepting and consenting to the practices described in this policy.

15.2 Information We May Collect

At any stage when we collect personal data via our website we will notify you of this. We collect personal data via the following methods:

- ✓ When you register or enrol to use our website
- ✓ When you report a problem with our site

The information you give us may include your name, address, email address and phone number, personal description and copies of identification documents.

15.3 Data Usage

We have to have a valid reason to use your personal information. It's called the "lawful basis for processing". Sometimes we might ask your permission to do things, like when you subscribe to an email. Other times, when you would reasonably expect us to use your personal information, we don't ask your permission, but only when:

- ✓ we have a lawful basis to process it, and
- ✓ does not adversely infringe your rights

We will periodically check that the Personal Data we store for you is accurate.

15.4 HOW WE USE INFORMATION YOU GIVE US

We will use the information to answer your enquiry, and/or process your application or online enrolment

- ✓ To notify you about changes to our service.
- ✓ To ensure that content from our site is presented in the most effective manner for you and for your computer.
- ✓ To improve our site to ensure that content is presented in the most effective manner for you and for your computer.
- ✓ As part of our efforts to keep our site safe and secure.

15.5 DISCLOSURE OF YOUR INFORMATION TO THIRD PARTIES

- ✓ In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- ✓ Education House Leeds substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- ✓ If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Use and other agreements; or to protect the rights, property, or safety of Education House Leeds, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of preventing harm such as fraud and credit risk
- ✓ In order to enforce any contract with you
- ✓ To protect our rights, property, or the safety of our employees, clients, constituents or others. This includes exchanging information with other organisations and local authorities for the purposes of fraud, safeguarding and crime prevention.

Again, we will always undertake a balancing exercise when we undertake such sharing and ensure that third parties with whom we work respect your privacy too.

15.6 DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

15.7 INTELLECTUAL PROPERTY RIGHTS

We are the owner or the licensee of all intellectual property rights in our site, and in the material published on it. Those works are protected by copyright laws and treaties around the world. All such rights are reserved.

You may print off one copy, and may download extracts, of any page(s) from our site for your personal use and you may draw the attention of others within your organisation to content posted on our site.

You must not modify the paper or digital copies of any materials you have printed off or downloaded in any way, and you must not use any illustrations, photographs, video or audio sequences or any graphics separately from any accompanying text.

If you print off, copy or download any part of our site in breach of these terms of use, your right to use our site will cease immediately and you must, at our option, return or destroy any copies of the materials you have made.

15.8 LINKS TO OTHER WEBSITES

Our site may, from time to time, contain links to and from the websites of our own projects, partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

15.9 YOUR RIGHTS

At Education House Leeds we want you to be in control of your own personal information. With this in mind you have:

- ✓ **Right to withdraw consent:** You may withdraw your consent to processing at any time, explaining why you wish to do so.
- ✓ **Rectification:** You may ask us to rectify inaccurate Personal Data held about you by providing the updated information.
- ✓ **Erasure:** You may ask us to delete your Personal Data, specifying why you would like us to delete your Personal Data.
- ✓ **Portability:** You may ask us to provide you with the Personal Data that we hold about you in a structured, commonly used, machine readable form, or ask for us to send such Personal Data to another data controller.
- ✓ **Right to object:** You may object to our processing of your Personal Data by providing details of your objection.
- ✓ **Make a complaint:** You may make a complaint about our data processing activities to a supervisory authority

15.10 HOW LONG WE STORE YOUR INFORMATION

Education House Leeds and its affiliates retain personal data for varying time periods in order to assist us in complying with legal and regulatory obligations, to enable compliance with any requests made by regulators or other relevant authorities and agencies, to enable us to establish, exercise and defend legal rights and claims, and for other legitimate business reason, as set out in this Privacy Policy. If you want to find out more about how we retain your data, please contact us using the contact details set out in this Policy.

15.11 CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. We will always include the date of a new version so that you know when there has been a change. If you don't agree to the changes, please don't continue to use our site or provide us with your personal information.

15.12 FURTHER INFORMATION

Office Address: 5 - 11 Hares View Leeds, LS8 4LH UK
Call us: +44 (0)7455 222 161, +44 (0)113 322 6557
Email: info@ehouse.org.uk

16. Prevent Policy

16.1 Introduction

Education House Leeds (eHouse) takes all reasonable steps to promote and safeguard the welfare of all individuals engaged in any activity. There are robust safeguarding arrangements in place at eHouse premises which are regularly reviewed to keep all learners safe. eHouse is committed to the promotion of an inclusive learning community which does not allow any individual or group of individuals to be marginalised, stigmatised or excluded.

We have a responsibility to promote values of openness and respect and to facilitate free debate which is characteristic of being a British citizen.

In accordance with our standard practice the eHouse Prevent Policy will be updated annually in line with emerging government information, advice and guidance or before that should the necessity arise.

16.2 Government Policy

Section 21 of the Counter Terrorism and Security Act 2015 places a duty on certain bodies to have “due regard to the need to prevent people from being drawn into terrorism”. The government’s Prevent Strategy was published in 2011 and forms part of an overall Counter Terrorism Strategy known as CONTEST. The Contest Strategy has four elements which are detailed below:

- ✓ Pursue
- ✓ Protect
- ✓ Prepare
- ✓ Prevent

Prevent is the key part of the Contest Strategy which aims to stop people from becoming terrorists or supporting terrorism. Early intervention is the heart of Prevent in diverting people away from being drawn into terrorist activity as Prevent happens before any criminal activity takes place. It is about recognising, supporting and protecting individuals who might be susceptible to radicalisation.

The 2011 Prevent Strategy objectives are as follows: -

- ✓ Respond to the ideological challenge of terrorism and the threat we face from those that promote it
- ✓ Prevent people from being drawn into terrorism and ensure that they are given appropriate support
- ✓ Work with sectors and institutions where there are risks of radicalisation that we need to address

The government’s Prevent Strategy was explicitly changed in 2011 to deal with all forms of terrorism and target not only violent extremism but also non-violent extremism which can create an atmosphere conducive to terrorism and can popularise the views which terrorists exploit.

The United Kingdom currently faces a range of terrorist threats. All terrorist groups who pose a threat to the UK seek to radicalise and recruit people to their cause. A system of threat levels has been created which represents the likelihood of an attack in the near future. The current government threat level from international terrorism in the UK is 'severe' which means that a terrorist attack is a strong possibility.

16.3 Definitions

For the purposes of this document the following definitions have been adopted.

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, then participate in terrorist groups.

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.

In the common Inspection Framework, September 2015, inspectors make their judgement on safeguarding under the Effectiveness of Leadership and Management based on whether "learners are suitably protected from the risks associated with radicalisation and extremism".

16.4 Aims and Objectives

The aim of the eHouse Prevent Policy is to ensure that we are able to monitor, manage and deal effectively with the threat posed by any individual or group of individuals engaging in violent extremism in the name of ideology or belief.

- ✓ To develop staff knowledge of Prevent
- ✓ To ensure that learners, and all employees of eHouse are aware of their roles and responsibilities in preventing violent extremism and radicalisation
- ✓ To promote and reinforce shared values, to create space for free and open debate, and support the learner voice.
- ✓ To document and recognise current practice across the company which effectively manages the risk of learners being exposed to extremism and becoming radicalised.

16.5 Responsibilities

- ✓ To ensure that eHouse effectively manage risks and is able to deal appropriately with issues around radicalisation and extremism the company will:
- ✓ Understand the nature of the threat from extremism and how this may impact directly or indirectly on the company
- ✓ Understand and manage potential risks within the organisation and from external influences including the display of extremist materials and the hiring of external premises
- ✓ Respond rapidly and appropriately to events in local, national or international news that may impact on the organisation
- ✓ Ensure measures are in place to minimise the potential for acts of extremism within the organisation
- ✓ Ensure plans are in place to respond appropriately to a threat or incident within the organisation
- ✓ Adopt effective IT security and promote this to all staff and learners

16.6 Teaching, Learning & support

eHouse is committed to providing a curriculum which promotes knowledge, skills and understanding in order to build the resilience of all learners, by undermining extremist ideology and supporting the learner voice. This will be achieved through:

- ✓ Embedding equality, diversity and inclusion across the curriculum and promoting community cohesion
- ✓ Promoting wider skill development such as social emotional wellbeing Developing a curriculum which recognises local needs, challenges extremism and promotes universal rights
- ✓ Teaching and learning strategies which explore controversial issues in a way which promotes equality, diversity and inclusion
- ✓ Use of external organisations to support learning and promote respect

To ensure that the organisation community remains safe the following support will be in place for learners:

- ✓ Effective support services which provide clear information, advice and guidance on preventing learners from being drawn into extremism and radicalisation
- ✓ Literature written in clear and simple language which promotes equality, diversity and inclusion and undermines extremist ideology
- ✓ Support for learners and staff and guidance on how to access support through community partners
- ✓ Clear channels of communication to listen to the voice of the local community and understand local tensions
- ✓ Support for at risk learners through Safeguarding and mentoring processes
- ✓ A focus on closing the achievement gaps for all learners

16.7 Staff Responsibilities

Training Lead / Internal Quality Assurance Officer of eHouse, Sabir Hussain holds overall responsibility for ensuring that the Prevent policy is implemented across the company and any concerns are shared with the relevant organisations in order to minimise the risk of learners becoming involved with terrorism. He is assisted by Designated Safeguarding Officer.

The Safeguarding Officer ensure that staff and learners are aware of the Prevent Agenda and appropriate training is in place from reputable training organisations, including Counter Terrorism units.

All staff at eHouse have a responsibility to:

- ✓ Provide an ethos which upholds the organisation's mission, vision and values and promote respect, equality and diversity and inclusion
- ✓ Report any concerns around extremism or radicalisation via the safeguarding reporting channels
- ✓ Report and remove any literature displayed around the organisation that could cause offense or promote extremist views
- ✓ Support the development of staff and learner understanding of the issues around extremism and radicalisation and participate in training when requested
- ✓ Participate in engagement with local communities, schools and external organisations as appropriate

16.8 Referrals

Where there is an identified/potential risk that a learner may be involved in supporting or following extremism, further investigation by the police will be requested, prior to other assessments and interventions. A Designated Safeguarding Officer is responsible for contacting local Police.

Any member of staff who identifies such concerns must report these to the Designated Safeguarding Officer as soon as possible for action – this will be recorded in the usual manner on the eHouse Safeguarding log.

Incidents in relation to extremism are expected to be very rare but immediate action will be taken when information suggests that a violent act is imminent, or where weapons or other materials may be in the possession of a learner or a staff member. In this situation, a 999 call will be made and the organisation's Senior Management team informed as soon as practicably possible.

Where a child or vulnerable adult is thought to be in need or at risk of significant harm or where investigations need to be carried out a referral to Social Services will be made in line with the organisation's safeguarding procedures following advice from the appropriate agencies.

16.9 Training

- ✓ Training on PREVENT will be delivered as and when there is a necessity to ensure that all staff have up to date information and briefings. This will be delivered by either the Safeguarding officer / Training Lead or an external reputed organization.
- ✓ All new staff to the organisation will receive Prevent training as part of their Induction programme, and certificates are kept in their personnel file that is called profile.
- ✓ All staff (to whom it is relevant) undergo a full PVG check to confirm their current status annually.
- ✓ All staff (to whom it is relevant) will be trained on L2 Award in understanding the Prevent and Safeguarding Strategies.
- ✓ Briefing sessions are arranged by the Training Lead, Sabir Hussain should there be any update to the statutory guidance.
- ✓ Safeguarding officer and Training lead take part in Safer Staff Recruitment as a rolling programme.

16.10 Who is who?

PREVENT Office / Training Lead	Sabir Hussain
Safeguarding Officer	Rashad Bokhari

PREVENT & ANTI RADICALISATION RISK ASSESSMENT

IDENTIFY THE HAZARD	WHO MIGHT BE HARMED AND HOW	LIST EXISTING PRECAUTIONS	RISK RATING FOLLOWING PRECAUTION High/med/low
<p>E-House Business Management & Administration participants being drawn into terrorism and/or extremist views which could bring themselves or others to harm</p>	<p>All participants; specifically, those who:</p> <p>May be vulnerable due to religious views, political viewpoints and family circumstances;</p> <p>Disagree with the concept of individual rights to personal choices and personal freedoms, as well as freedom of expression and Equality and Diversity as it operates in the UK;</p> <p>Find it difficult to engage with others and make friends outside people from their own specific culture / background</p> <p>May have a particular need that means it is difficult to interact with other people</p>	<ul style="list-style-type: none"> ✓ Preventing radicalisation guidance is part of the safeguarding policy and separate / specific policy is also in place. ✓ The Prevent Policy will be reviewed and updated annually in conjunction with feedback from participants (formative / summative participant feedback), Programme Lead, trainers, safeguarding officer and Prevent Lead Officer. ✓ The Prevent Policy and the Safeguarding Policy are on the website. ✓ Recruitment procedures are followed and references taken up for all staff members. ✓ Acceptable ICT use policy for participants and for staff members including use of social media. ✓ All members of staff have up to date Safeguarding and Prevent training to enable the effective understanding and handling of referrals relating to safeguarding, radicalisation and extremism. ✓ All staff have done Prevent Awareness Training and Certificates of training are kept securely on file in the Office. ✓ Information available for participants through availability of Prevent / Radicalisation / Extremism information leaflet (available on website). ✓ Programme Induction teaches participants how to assess risk, including risk of being drawn into gangs, on keeping themselves safe. ✓ Training aspects are integrated into the curriculum to promote British Values and the importance of respect, acceptance and understanding diversity of staff working in work teams and in the role of team leader, supervisor or manager. ✓ The Communication module has information and activities that promote the importance of challenging unproductive over-zealous viewpoints, prejudices and stereotypes. <p>E-House will ensure that participants are not exposed to inappropriate materials:</p> <ul style="list-style-type: none"> ✓ Visitors to E-House to be members of recognised organisations. Any concerns around visitors are reported to the lead for Prevent. ✓ The Prevent lead to attend any local seminars / conferences as needed to ensure secure local knowledge. ✓ Ensure that within context of E&D objectives there is support for anyone who might be identified by Prevent (i.e.: pro-active approach to avoiding stigma). ✓ As appropriate, make use of local intelligence information to identify and manage any possible risks, if relevant. 	<ul style="list-style-type: none"> ✓ Low ✓ Low ✓ Low ✓ Low ✓ Low ✓ Low ✓ Low ✓ Low ✓ Low ✓ Low ✓ Low ✓ Low ✓ Low ✓ Low

AREA OF ACTIVITY	TO WHOM IS IT APPLICABLE	CONTROLS IN PLACE TO MANAGE RISK
Partnership and engagement	Participants/staff	<ul style="list-style-type: none"> ✓ Prevent lead held discussion with his contacts in Kirklees Council, Kirklees College & Huddersfield University Leeds for advice in terms of training and raising awareness. ✓ Prevent / Safeguarding is now a standard agenda item on all staff meetings. ✓ All staff are aware of the factors that make an individual vulnerable and have a good awareness of stereotypes. ✓ In the same way as E-House Leeds has always taken safeguarding seriously, we take this (as an element of safeguarding) seriously and the MD and Principal (DSL), are fully aware of the actions to take and who to contact in the event of concern. ✓ All staff know to contact in the event of concerns (DSLs). ✓ The Prevent Lead is aware of who to share information with regarding the Prevent duty.
Online Safety	Participants/staff	<ul style="list-style-type: none"> ✓ The online safety policy to be updated to contain specific references to the Prevent Duty. ✓ The Shine Centre has a robust firewall and filtering programme. ✓ E-House will clearly communicate to participants about potential risks posed by online activity, including the use of Apps such as "WhatsApp".
Site Security	Participants/Staff	<p><i>There are some arrangements in place to manage access to the delivery premises – the Shine Centre site by visitors and other adults</i></p> <ul style="list-style-type: none"> ✓ Visitors are allowed access through reception. ✓ Dangerous substances involved with cleaning are kept on site in a locked cupboard (accessible only to premises staff). ✓ There are no off-site activities and on-site activities are risk assessed.
Staff and Volunteers	Participants	<ul style="list-style-type: none"> ✓ All staff are subject to rigorous ongoing safeguarding checks. ✓ The Principal is proactive in supporting participants and staff pastorally.

17. Reasonable Adjustment & Special Considerations Policy

17.1 Reasonable Adjustment

Reasonable adjustment is any action that helps to reduce the effect of a disability or difficulty, which places the learner at a substantial disadvantage in the assessment situation. The work produced following a reasonable adjustment must be assessed in the same way as the work from other learners. Learners should be made aware of the reasonable adjustments available at enrolment.

17.2 Examples of Reasonable Adjustments

- ✓ Allowing extra time (e.g. assignment extensions)
- ✓ Different assessment location
- ✓ Use of coloured paper
- ✓ Large text or Braille
- ✓ Readers/scribes/transcribers
- ✓ Translations
- ✓ British Sign Language (BSL)
- ✓ Use of special technology (e.g. software)

17.3 Examples of non-Reasonable Adjustments

Reasonable adjustments must not, however, affect the reliability or validity of assessment outcomes nor must they give the learner an assessment advantage over other learners undertaking the same or similar assessments. This may involve:

- ✓ Changing usual assessment arrangements.
- ✓ Adapting assessment materials.
- ✓ Providing assistance during assessment.
- ✓ Re-organising the assessment environment.
- ✓ Changing or adapting the assessment method.
- ✓ Using technology to assist.

17.4 Reasonable Adjustments and awarding body

All reasonable adjustments allowed by Education House Leeds must comply with the assessment rules and assessment criteria for each qualification and awarding body. Education House Leeds understands that if it misuses the reasonable adjustment policy, then the awarding body will take appropriate action. Such action will range from advice and action for the centre through to the implementation of steps to manage assessment malpractice. This could ultimately lead to the recall of certificates, removal of qualification approval or removal of centre approval.

17.5 Special Consideration

This is a post-assessment allowance to reflect temporary illness, injury or indisposition that occurred at the time of assessment. The learner may have missed part of the assessment due to circumstances outside of their control. Any special consideration granted cannot remove the difficulty the learner faced at the time of assessment and can only be a relatively small adjustment to ensure that the integrity of the assessment is not compromised. It cannot give the learner an unfair advantage. The learner's results must reflect real achievement and not potential ability. Education House Leeds's decision will be based on factors which may vary from learner to learner, and from one subject to another. These factors may include the severity of the circumstances, the date or type of assessment. Special consideration is permitted when alternative assessment arrangements agreed before the assessment proved inappropriate or inadequate.

The following are examples of circumstances which might be eligible for special consideration (this list is not exhaustive):

- ✓ Terminal illness of the learner.
- ✓ Terminal illness of a parent.
- ✓ Recent bereavement of a member of the immediate family.
- ✓ Serious and disruptive domestic crises leading to acute anxiety about the family.
- ✓ Incapacitating illness of the learner.
- ✓ Severe car accident.
- ✓ Recent traumatic experience such as death of a close friend or distant relative.
- ✓ Flare-up of severe conditions such as epilepsy, diabetes or severe asthma.
- ✓ Recent domestic crisis.
- ✓ Recent physical assault trauma.

Education House Leeds would put arrangements in place to enable a learner to complete an assessment and thus achieve the qualification. Only when this is unsuccessful should an application for special consideration be made. All applications for special consideration can only be made on a case-by-case basis and thus separate applications must be made for each learner. The only exception to this is where a group of learners has been affected by a similar circumstance such as a fire alarm during an assessment. In this case a group application is permissible, with a list of learners affected attached to the application?

Applications for special consideration should be submitted to the awarding body. The evidence to support the application must be enclosed, such as a medical certificate, a doctor's letter, a statement from the invigilator (if relevant), or any other appropriate information. The Director will authorise all applications for special consideration. Applications must be submitted to the awarding body within seven days of the assessment having taken place.

17.6 Complying with the Policy

Education House Leeds understands that failure to comply with the requirements contained within this policy document could lead to assessment malpractice, which will impact on the learner's result.

17.7 Failure to comply is defined as:

- ✓ Putting in place arrangements without the awarding body's approval.
- ✓ Agreeing adjustments not supported by evidence.
- ✓ Failure to report adjustments requested by the awarding body.
- ✓ Agreeing adjustments that affect the validity and reliability of assessments, compromises the outcomes of assessments or gives learners an unfair assessment advantage over other learners taking the same or similar assessments.

17.8 Quick Look

Definition of Reasonable Adjustments	It is any action that helps to reduce the effect of a disability or difficulty that places the learner at a substantial disadvantage in the assessment situation.
Definition of Special Considerations	Post-assessment allowance to reflect temporary illness, injury or indisposition that occurred at the time of assessment.
Related Policies	Malpractice, Maladministration and Plagiarism Policy

18. Risk Management Policy

18.1 RISK MANAGEMENT STRATEGY

This is our new Risk Management Policy. This approach to risk needs to be successfully implemented and embedded across our operations. We need to consolidate our approach, to manage risk effectively, taking advantage of opportunity as well as recognising and managing risks that we face. Successful, dynamic organisations need to take risks, but we need to be aware of those risks we are taking, understand them, and where possible act to control them and mitigate their negative impacts.

18.2 Definitions for the Purpose of This Procedure

- ✓ **RISK** is taken to mean the chance that an event or action will occur which may adversely impact or affect our ability to successfully deliver our objectives. It is about the consequences of business decisions, such as financial viability that can have an impact on our programmes, reputation, the health, safety and welfare of staff and students / candidates' or members of the public or on the organisation's finances.

- ✓ **RISK ASSESSMENT** means the process used to determine risk management priorities.
- ✓ **RISK MANAGEMENT** is the implementation of management strategies to identify, manage and monitor risks. Risk Management involves the identification of risks and the assessment of what will happen if the that risk is realised and causes harm to the organisation. There are two elements to the risk: the likelihood or probability (how likely is it to happen) and the impact (what is the effect).
- ✓ **Risk Management** is about carefully identifying what might happen, and what the consequences of the event might be. If those consequences are adverse it is about identifying what change could be made to make the effect less severe.
- ✓ **RISK REGISTER** is the register/document which records details of all the risks identified, their grading/score in terms of impact and likelihood, monitoring processes and further action to be taken to enhance the risk management.
- ✓ **LIKELIHOOD** is the score given to the probability or frequency of the risk occurring.
- ✓ **IMPACT** is a score given to the potential consequences the risk would have on Landmarks College

Done effectively Risk Management will improve our strategic and operational management, enabling the delivery of quality programmes and the vision and objectives. It will also improve the certainty, delivery, financial control, and management of programmes. Risks arise in our ongoing operations (and these change over time as the dynamics of the actions of others impact on us) but are particularly prevalent in new programmes.

E-House Leeds already has many processes and policies to control risks - written rules and procedures, (e.g. Health and Safety Plans etc.). The Risk Management process is intended to identify a wider range of risks.

When an activity is identified as creating moderate to high risks, E-House Leeds needs to decide if it is willing to accept these risks. Occasionally it will have no choice, if it wishes an activity to continue, but usually it is possible to identify control processes which can help to mitigate or at least reduce uncertainty when a risk arises.

The potential risk treatments need to be identified, assessed and implemented. There needs to be clear responsibility (on an individual) for implementation and review.

This Strategy describes the roles in identifying and reporting risks. This is an important part of operational and strategic management, but compliance also demonstrates the highest standards of organisational behaviour.

Risk Management is the responsibility of every staff member It is important that managers act to provide training and promote awareness amongst staff

Innovation always brings a degree of risk. Good Risk Management is about recognition and action.

18.3 Responsibilities

The Managing Director is responsible for overseeing risk management across the organisation. The Principal is responsible for ensuring that a Risk Register is established, implemented and maintained. Further the Principal will review existing risks, identifying emerging areas of risk, review current controls and monitoring processes and identify further action to be taken to further reduce the potential impact and/or likelihood.

18.4 Principle risks and uncertainties

- ✓ **Failure to follow policy and procedures:**
 - a) Breach of confidentiality or data protection
 - b) Failure to safeguard candidates
 - c) Breach of Health and Safety protocols, policies and procedure
- ✓ **Failure to achieve planned income and maintain financial viability**
 - a) Failure to recruit required numbers of candidates
 - b) Failure to maintain quality of the programme
 - c) Impact of Coronavirus on number of candidates attending
- ✓ **Controls**
 - a) Rigorous budget and sensitivity analysis
 - b) Regular monthly budget monitoring (income, expenditure)
 - c) Robust Financial controls

18.5 Developing the Risk Register

The Risk Register aims to identify the strategic and operational risks to the charity from the perspective of all stakeholders both internal and external.

The Risk Register has been divided into four key areas:

- ✓ Strategic
- ✓ Financial
- ✓ Operational
- ✓ Personnel

Each area is then broken down into more specific risks which are individually assessed.

For each risk the Risk Register records:

- ✓ A description of the potential consequences to Education House Leeds if the risk was realised.
- ✓ An impact and likelihood score of between 1 and 5.

	Impact Scores	Likelihood Scores
1	Insignificant	Almost impossible
2	Minor	Very unlikely
3	Significant	Unlikely
4	Major	Likely
5	Catastrophic	Very likely

The total score recorded for each area reflects the potential impact and likelihood if no controls were in place.

- ✓ The current controls in place.
- ✓ The impact, likelihood and net scores which eHouse considers to be the present risk with the existing controls in place. This also identifies strategic and organisational priorities.
- ✓ The monitoring processes in place.
- ✓ Identified staff – currently the Principal in conjunction with the Programme Lead have the lead operational management responsibilities to ensure that the risk management processes are adequately controlled and monitored.
- ✓ 'Further Action' provides information on planned activities to be taken to further reduce the potential impact and/or likelihood of the risk.
- ✓ For each category and specific area of risk the net impact and likelihood scores are plotted onto a matrix.

18.6 *Reviewing the Risk Register*

The Risk Register is reviewed as part of the reviewing processes conducted in conjunction with the MD and is reported at least annually or if there is a significant change or issue which necessitates the register to be updated sooner.

STRATEGIC

AREA OF RISK	POTENTIAL CONSEQUENCES	IMPACT SCORE	LIKELIHOOD	TOTAL SCORE	CURRENT CONTROLS	IMPACT SCORE	LIKELIHOOD	NET SCORE	MONITORING PROCESS	FURTHER ACTION
Increasing competition from other providers	<ul style="list-style-type: none"> ✓ Loss of business ✓ Reduction in students ✓ Loss of income ✓ Financial viability of college ✓ Loss of reputation 	3	3	9	<ul style="list-style-type: none"> ✓ Competitive pricing and emphasising uniqueness- USP ✓ Raising profile ✓ Responding to new business agenda's ✓ Increasingly diversifying business activities ✓ Improved relationship with employers ✓ Good outcomes for students ✓ Monitoring competitor's activities ✓ Achieving good/excellent inspection outcomes ✓ Partnership working/networking 	2	2	4	<ul style="list-style-type: none"> ✓ Detailed business planning ✓ Attending local and regional events/forums ✓ Reviewing financial performance against competitors 	<ul style="list-style-type: none"> ✓ Further promoting the organisation and its uniqueness ✓ Responding to international management agenda and commissioning strategies. ✓ Maintain high profile with employers ✓ Competitive and transparent pricing policy ✓ Improved and increase variety in course / programmes ✓ Investigate feasibility of entering into partnership opportunities
Breach of Health and #Safety Legislation	<ul style="list-style-type: none"> ✓ Loss of reputation ✓ Criminal prosecution resulting in fines ✓ Custodial sentence ✓ Restrictions imposed by regulatory bodies. ✓ Closure of organisation ✓ Illness, injury or death ✓ Increased costs ✓ Reduced income. 	4	5	20	<ul style="list-style-type: none"> ✓ Adequate insurance cover. ✓ Qualified Health and Safety Advisor, ISOH Registered – Programme Lead ✓ Health and Safety on each team meeting agenda ✓ Committee ✓ Staff training relevant to roles and responsibilities ✓ Detailed comprehensive Health and Safety Policy and procedures ✓ External audits/inspections ✓ Internal routine in -house 	2	2	4	<ul style="list-style-type: none"> ✓ Subscriptions to professional publications ✓ Membership of Health and Safety forums ✓ Health and Safety Committee ✓ Internal audits and inspections 	<ul style="list-style-type: none"> ✓ Formal site inspections by the Programme Lead - qualified in Health and Safety ✓ Risk Assessment training ✓ Improved performance measurement of staff with defined H & S responsibilities ✓ Independent audits and inspections ✓ Training delivery venue high quality with focus on H&S

FINANCIAL										
AREA OF RISK	POTENTIAL CONSEQUENCES	IMPACT SCORE	LIKELIHOOD	TOTAL SCORE	CURRENT CONTROLS	IMPACT SCORE	LIKELIHOOD	NET SCORE	MONITORING PROCESS	FURTHER ACTION
Expenditure exceeds income	<ul style="list-style-type: none"> ✓ Reduced resources ✓ Insufficient funds ✓ Reduction in reserves/ cash flow ✓ Loss of reputation ✓ Unexpected or abnormal expenditure costs 	4	4	16	<ul style="list-style-type: none"> ✓ Monthly management accounts ✓ Detailed monthly accounts reviewed by the MD and Principal ✓ Internal financial controls ✓ Achieving value for money through contract negotiations ✓ Effective budget and cash flow management 	3	2	6	<ul style="list-style-type: none"> ✓ Monitoring performance against financial monthly ✓ Cash flow forecasting weekly and monthly ✓ Variance analysis of all major costs ✓ Monthly Finance Meetings 	<ul style="list-style-type: none"> ✓ Improved monthly reporting ✓ Review Salaries / Pay rates ✓ Generate new sources of income through trading, fund raising and new business activities ✓ Fee reviews ✓ Target efficiency savings to maintain quality.
Coronavirus	<ul style="list-style-type: none"> ✓ Delayed recruitment / start of short course programme due to visa issues and travel restrictions 	4	4	16	<ul style="list-style-type: none"> ✓ Little financial outlays made and programme can easily be delayed to later in the year when restrictions have been lifted 	2	2	4	<ul style="list-style-type: none"> ✓ Close monitoring of developing Coronavirus national and international situation ✓ Will accurately follow all national and international advice and guidelines 	<ul style="list-style-type: none"> ✓ Adjust timescales of programme as required to follow most up to date advice from UK Government and relevant international bodies

OPERATIONAL										
AREA OF RISK	POTENTIAL CONSEQUENCES	IMPACT SCORE	LIKELIHOOD	TOTAL SCORE	CURRENT CONTROLS	IMPACT SCORE	LIKELIHOOD	NET SCORE	MONITORING PROCESS	FURTHER ACTION
Participant involved in critical incident / terrorist incident	<ul style="list-style-type: none"> ✓ Loss of reputation ✓ Police investigation ✓ Reduced referrals ✓ Litigation ✓ Staff turnover 	5	2	10	<ul style="list-style-type: none"> ✓ Integration of British values etc in the curriculum and behaviour training ✓ All staff highly experienced in training delivery and challenging behaviours ✓ All staff trained in Prevent and Safeguarding ✓ Clear referral processes, reporting protocols 	3	2	6	<ul style="list-style-type: none"> ✓ Regular monitoring and review ✓ Small staff team so lots of informal discussions about participants ✓ Small group of participants and low number of cohorts initially 	<ul style="list-style-type: none"> ✓ Further and continued CPD for staff in this area ✓ Area of significant evaluation during first cohort

19. Teaching Contingency Policy

19.1 Policy

It is the policy of Education House Leeds that in the event that a Trainer, Tutor or teacher becomes incapacitated and unable to teach a scheduled session.

19.2 Training / Teaching Continuity

Below mentioned table is used to illustrate the identification of possible teaching contingencies, the conditions for acting, the contingency action to be taken, and the intended result.

Contingency	Conditions for Action	Contingency Action	Intended Result
Primary Trainer, Tutor or Teacher is ill.	Primary instructor is unable to conduct a scheduled course.	An available instructor or assistant instructs the course during the absence. This action requires that assistants also be familiar with the training materials and course routine.	Course is conducted without interruption of the schedule.
Assistant is not available.	Assistant is unable to assist trainees during a scheduled course.	A replacement is obtained if a qualified person is not available; otherwise, the course is conducted without the assistant.	Course is conducted without interruption of the schedule.

19.3 Trading Continuity

If the worst should happen and Education House Leeds cannot continue trading, but with learners still on training / courses, the Education House Leeds's administrator will do everything possible to ensure learners can continue their courses. He will contact other training centres and further education colleges to try to transfer learners onto their training/courses. Compensation and expenses will be made available to learners affected.

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