



**Universify  
Education**

**POLICY PACK 2020**



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# Introduction to Policies

These policies are designed to give a clear sense of the procedures and processes that will be followed by Universify Education in the event of various circumstances.

We are an equal opportunities employer and do not discriminate on the grounds of gender, sexual orientation, marital or civil partner status, pregnancy or maternity, gender reassignment, race, colour, nationality, ethnic or national origin, religion or belief, disability or age.

## **FOR STAFF**

1. The policies clearly set out the duties we owe you under your contract and those that you will owe us. You are deemed by The Company to have agreed to abide by these policies whilst working with us upon signing your contract.
  - a. The staff code of conduct is designed to outline in clear terms those behaviours and responsibilities that you have, and it is important to be familiar with it.
  - b. The Company may from time to time alter these policies.
  - c. The policies and procedures set out in this handbook apply to all Staff unless otherwise indicated.
  - d. They do not form part of the terms of your contract with us, which are provided to you separately.
  - e. Universify Education shall also be referred to by “The Company” or “The Charity”.
  - f. References to “Staff”, “Staff Members” and “Members of Staff” are deemed to include all Employees and Contractors of Universify Education.
  - g. All references to ‘Line Manager’ are based on the management hierarchies outlined in the Company Organogram.

## **FOR VOLUNTEERS**

2. The policies clearly set out the duties we owe you and those that you will owe us. You are deemed by The Company to have agreed to abide by these policies whilst working with us upon accepting your volunteer role.

- a. The staff code of conduct is designed to outline in clear terms those behaviours and responsibilities

that you have, and it is important to be familiar with it.

- b. The Company may from time to time alter these policies.
- c. The policies and procedures set out in this handbook apply to all Staff unless otherwise indicated.
- d. References to “Volunteers” or “Staff” are deemed to include all Volunteers of Universify Education. This shall explicitly include but not be limited to the Volunteer coaches, Group Leaders and Course Directors at Universify Education.
- e. All references to ‘Line Manager’ are based on the management hierarchies outlined in the Company Organogram.

## **FOR STUDENTS**

3. These policies are designed to protect students’ welfare and safety before, during and after the course. They should be read in conjunction with the:

- Student Handbook
- Terms and Conditions
- Course Rules

These can be found at [www.universifyeducation.com](http://www.universifyeducation.com) and will be updated from time to time.

4. The policies set out clearly the duties we owe you under the terms and conditions and those that you will owe us. You are deemed by The Charity to have agreed to abide by these policies whilst attending one of our courses by agreeing to the terms and conditions.

# Disciplinary and Capability Procedure

1. The Company requires high standards of discipline from its Staff and Volunteers, together with excellent standards of work. This procedure is intended to help maintain standards of conduct and performance and to ensure fairness and consistency when dealing with allegations of misconduct or poor performance.
2. The purpose of the Staff and Volunteer disciplinary procedure is to ensure that concerns over conduct, capability or performance are handled fairly, consistently and swiftly. The intention is to bring an improvement, and to protect the operation of the Company's business, the health and safety of all, and the personal wellbeing and the educational attainment of the students.
3. All Staff and Volunteers will be informed of the standards of conduct and work performance expected in their role. Staff and Volunteers are responsible for maintaining high standards and for raising any concerns they have about their ability to meet standards or rules.
4. Minor conduct or performance issues can usually be resolved informally with Line Managers. The formal procedure is available where the matter is more serious. It does not form part of any Staff's contract and the Company may amend it at any time.

## **Investigations**

5. The matter will be thoroughly investigated with the sole purpose of fact-finding ahead of a disciplinary hearing.
6. In some cases of alleged misconduct, we may need to suspend you from work while we carry out the investigation or disciplinary procedure (or both). While suspended, you should not visit the College site or contact any of the students, parents or other Members of Staff, unless authorised to do so. Suspension is not considered to be disciplinary action. Some Staff and Volunteers are resident on site as part of their role at The Company. In the case of a suspension, it may involve removal from the College Site for those Staff resident on the site. The Company will ensure that alternative accommodation or

transport in such situations.

## The Hearing

7. We will give you written notice of the hearing. To enable your preparation, you will be provided with sufficient information about the alleged misconduct or poor performance and its possible consequences. You will normally be given copies of relevant documents and witness statements.
8. You may be accompanied at the hearing by a colleague, who will be allowed reasonable paid time off to act as your companion.
9. You should let us know as early as possible if there are any relevant witnesses you would like to attend the hearing or any documents or other evidence you wish to be considered.
10. We will inform you in writing of our decision, usually within one week of the hearing.
11. Any formal disciplinary or poor performance hearing will be heard by the Course Director and two others who will be permanent employees.
12. All decisions after a formal hearing will be by majority vote of those conducting the hearing. All penalties will be subject to approval of the Charity Trustees.

## Disciplinary Action and Dismissal

13. Course Directors and above can make the decision to instigate formal procedures. If the Course Director is themselves the subject of the formal disciplinary and capability procedure then senior Head Office staff will initiate proceedings.
14. The usual penalties for misconduct or poor performance are:
  - a. **Stage 1.** First written warning or improvement note. Where you have no other active written warnings or improvement notes on your disciplinary record, you will usually receive a first written warning or improvement note. A copy of the improvement notes or first written warning will be kept on file and will be disregarded for disciplinary purposes after twelve



months, subject to satisfactory conduct performance in the meantime. There is no right of appeal to the improvement note or first written warning, nor is there any requirement to hold a hearing in order to issue the improvement note or first written warning. The Course Director and one other member of the Disciplinary Panel should be present when the Staff Member is given the improvement note/first written warning.

- b. **Stage 2.** Final written warning. In case of further misconduct or failure to improve where there is an active first written warning or improvement note on your record, you will usually receive a final written warning. This may also be used without a first written warning or improvement note for serious cases of misconduct or poor performance. A copy of this final written warning will be kept on file and will be disregarded for disciplinary purposes after twelve months subject to satisfactory conduct and performance in the meantime. A final written warning is given to the Staff Member by the Course Director and one other Member of the Disciplinary Panel.
- c. **Stage 3.** Dismissal or other action. You may be dismissed for further misconduct or failure to improve where there is an active final written warning on your record, or for any act of gross misconduct.

15. We may consider other sanctions short of dismissal, including demotion or redeployment to another role, and/or extension of a final written warning with a further review period. All penalties must be approved by, at least, the Programme Manager.

## Appeals

16. You may appeal in writing to the Charity Manager within one week of being told of the decision.

17. The appeal hearing will, where possible, be held by someone other than the person who held the original hearing. You may bring a colleague or professional representative with you to the appeal hearing.

18. We will inform you in writing of our final decision as soon

as possible, usually within one week of the appeal hearing. There is no further right of appeal.

19. In the case of dismissal, the Member of Staff shall not continue to work for the Company in the period between the decision to dismiss and the appeal decisions.

20. The Charity Manager shall hear the appeal and there is no further right of appeal.

### **Gross Misconduct**

21. Gross misconduct will usually result in dismissal without warning, with no notice or payment in lieu of notice (summary dismissal). The following are examples of matters that are normally regarded as gross misconduct:

- a. Theft or fraud;
- b. Physical violence or bullying;
- c. Deliberate and serious damage to property;
- d. Misuse of the organisation's property or name;
- e. Deliberately accessing internet sites containing pornographic, offensive or obscene material;
- f. Serious insubordination;
- g. Discrimination or harassment;
- h. Bringing the organisation into disrepute;
- i. Incapability at work brought on by alcohol or illegal drugs;
- j. Retaliation as laid out in the Anti-Harassment Policy;
- k. Any breach of the Company's Safeguarding Policy;
- l. Unacceptable levels of absence, especially when unauthorised (for authorisation procedures see the Sickness Absence Policy);
- m. Persistent lateness or poor timekeeping;
- n. Conduct subject to complaints by students;
- o. Causing loss, damage or injury through serious negligence; and
- p. A breach of health and safety rules or confidence

This list is intended as a guide and is not exhaustive.

22. Relationships exceeding pastoral responsibilities (as outlined in staff contracts and job specifications) between any staff member and any course will be deemed inappropriate and shall lead to instant dismissal.

23. Where time limits are referred to in this procedure they may be shortened or extended only by mutual consent.

24. Disciplinary and capability matters will be handled with as high a degree of confidentiality within the bounds of our legal and fiduciary obligations as is possible. Confidential records of disciplinary and capability matters will be kept in the Staff Member's personnel file in accordance with Data Protection legislation. Copies of meeting notes will be provided to the Staff Member, although the Company reserves the right to withhold certain information (e.g. to protect a witness).

25. In the case of volunteer staff, it is the responsibility of the appropriate Head Office Manager, in consort with the Disciplinary Panel, to determine the appropriate disciplinary action is taken in any case.

26. The Company reserves the right to terminate the contract with the Staff Member with immediate effect, after a formal hearing, where there has been gross misconduct on the part of the Staff Member.

27. The Disciplinary Panel will consist of appropriate people drawn from Head Office and senior seasonal staff where appropriate (Course Directors and Deputy Course Directors).

Updated: January 2020

# Grievance Procedure

1. The grievance procedure enables the Company to ensure that any problems, complaints or concerns raised by its Staff Members are dealt with in a fair, timely and consistent manner. If a Staff Member has a grievance or complaint regarding:
  - a. Their work;
  - b. Working conditions;
  - c. Pay and benefits;
  - d. Working hours;
  - e. Discrimination or Harassment as laid out in the Equal Opportunities Policy and Anti-Harassment Policy;
  - f. Treatment by colleagues (including issues of harassment and bullying);
  - g. Concerns about their health and safety or a breach of statutory employment rights;
  - h. Any issues affecting their employment, then they should raise it in accordance with this policy
2. If a student raises a grievance/complaint about their treatment on the course, this shall be dealt with in line with the 'Complaints' policy for Students.
3. This procedure does not form part of any Staff Member's contract. It may be amended at any time and we may depart from it depending on the circumstances of any case.

## **Informal Procedure**

4. Staff Members should, wherever possible, discuss their grievance or complaint with their Line Manager (as outlined in the staff members' contract) on an informal basis first.
5. Where it is not possible for the Member of Staff to talk to their Line Manager, or if the grievance concerns him or her, the Member of Staff should instead talk to another manager of equal or more senior status (Charity Manager for permanent Staff, Programme Manager for tutors and for volunteers).
6. Where the informal procedure is used, both parties should keep a written record of the meeting including what was discussed and any proposed action.

7. If the grievance has not been resolved or cannot be settled informally, the matter should be dealt with according to the formal grievance procedure.

### **Formal Procedure**

8. Written Statement:

- a. The Staff Member should put his/her grievance in writing and submit it to their Course Director ("Grievance"). Where it is the Course Director who is the subject of the Grievance, or the issue occurs outside of the summer period, the Member of Staff should instead send the written statement to the Programme Manager.
- b. The Grievance should set out the nature of the complaint, including any relevant facts, dates, and names of individuals involved so that the Company can investigate it.

9. Investigation and Decision:

- a. The Company will arrange a grievance meeting (the "Initial Meeting") normally within one week of receiving your written grievance. The Staff Member should make every effort to attend. The Initial Meeting shall be scheduled at a reasonable time and place, usually during the hours of 9am-5pm.
- b. A written note of the Initial Meeting, and if relevant the Post-Investigation Meeting, must be made by the recipient of the Grievance, and where possible, should be signed by both parties.
- c. The Member of Staff has the right to be accompanied at any meeting concerning the Grievance by a work colleague or a professional representative not acting in a legal capacity. The Companion shall be allowed to support the Member of Staff's case and confer with the Member of Staff during the meeting; but shall not answer questions on behalf of the Staff Member or address the meeting without the Member of Staff's consent.
- d. After the Initial Meeting, the Company will conduct a full investigation into the Grievance in order to

establish the facts surrounding it. This should be conducted by the representative of the Company at the Initial Meeting. If they are unable to do so then the Charity Trustees shall appoint someone to conduct the investigation. The person conducting the investigation shall be termed “The Investigator”, subject to disqualification for involvement in the Grievance, the “The Investigator” should approach necessary people.

- e. Following the Investigation, and within a reasonable time limit the Investigator shall (if necessary) convene a further meeting with the Member of Staff in order to discuss the outcome of the investigation and any action that is to be taken (the “Post-Investigation Meeting”).
- f. A full written response will be made to the Grievance to the Member of Staff and their representative detailing the outcome of the investigation and any action that is to be taken; and informing the Member of Staff in writing of their right appeal if they are not satisfied with the action taken.

#### 10. Stage Three – Appeal

- a. If the Grievance has not been resolved to the Staff Member’s satisfaction, they may appeal in writing to the Investigator stating full grounds of appeal, within 2 days of the date on which the decision was sent or given to the Staff Member.
- b. The Investigator will hold an appeal meeting, normally within one week of receiving the appeal. The Staff Member will be given reasonable notice of the time/date of the meeting.
- c. Where possible, the appeal meeting will be chaired by a different manager (normally of increasing seniority) who has not previously been involved in the case. However, where this is not practicable, the same manager may handle the different stages and they will act as impartially as possible. The Staff Member has the same accompaniment rights as at Stage Two.
- d. The Company will confirm the final decision in writing, usually within one week of the appeal hearing. There is no further right of appeal.

#### 11. Confidentiality

- a. Grievances will be handled with as high a degree of confidentiality as is practicable.
- b. Confidential records of the Grievance will be kept in the Member of Staff's personnel file in accordance with Data Protection legislation. Copies of meeting notes will be provided to the Member of Staff, although the Company reserves the right to withhold certain information (e.g. to protect a witness).

12. Action taken in response to a Grievance

- a. The Company may, after the investigation take different action in response to the Grievance, included but not limited to:
  - i. Commencing disciplinary procedures against the Member(s) of Staff subject to the Grievance in accordance with the Discipline Policy.
  - ii. This includes all remedies ranging from informal warnings to dismissal of the Member of Staff subject to the Grievance;
  - iii. Referring matters to the appropriate local/national authorities;
  - iv. Convening a conciliation meeting between the aggrieved party and the subject of the Grievance;
  - v. This shall be chaired by the Investigator and shall only be pursued upon the agreement of both parties – such agreement shall be gained first from the party bringing the grievance so as to ensure their confidentiality is respected; or
- b. Taking no action where it is deemed that the Grievance is without grounds.

Updated: January 2020

# Sickness Absence Policy

1. This policy is designed to assist the Company in effectively reporting and managing sickness related absence. The Company recognises the importance of ensuring that Staff Members are supported through any periods of absence and their subsequent return to work. Through an effective Sickness Absence Policy, the Company will be better positioned to identify any potentially unsafe work practices, any issues affecting Staff morale and any other underlying problems Staff may be facing.
2. Abuse of sickness absence, including failing to report absence or falsely claiming sick pay will be treated as misconduct under our Disciplinary and Capability Procedure.
3. This policy does not form part of any Staff's contract and we may amend it at any time.

## **Notification of Sickness**

4. If a Staff Member cannot attend work because they are sick or injured, he/she should telephone and email their Line Manager as early as possible and no later than 30 minutes after the time when they are normally expected to start work indicating when the illness started, the reason for your absence, and its likely duration.
5. If you are contracted to teach for the Company (and therefore not an employee) and if you are unable to teach the hours required by reason of illness you will be paid only for those hours you teach.
6. We reserve the right to terminate the contract for the provision of teaching in the event of an inability to deliver as a result of sickness or absence.
7. If you are a Member of Staff or Volunteer for the Company who is resident on site and are taken ill then you should remain in your room and arrange a doctor's appointment as soon as is practicable.

## **Evidence of Incapacity**

8. You must complete a self-certification form for sickness



absence of up to seven calendar days.

9. For absence of more than a week you must obtain a certificate from your doctor stating that you are not fit for work, giving the reason. You must also complete a self-certification form to cover the first seven days. If absence continues beyond the expiry of a certificate, a further certificate must be provided.

10. If your doctor provides a certificate stating that you "may be fit for work" you must inform your Line Manager immediately. We will hold a discussion with you about how to facilitate your return to work, taking account of your doctor's advice. If appropriate measures cannot be taken, you will remain on sick leave and we will set a date for review.

### **Return to Work Interviews**

11. After a period of sick leave your Line Manager may hold a return-to-work interview with you. The purposes may include:

- a. Ensuring you are fit for work and agreeing any actions to facilitate your return
- b. Confirming you have submitted the necessary certificates
- c. Updating you on anything that may have happened during your absence
- d. Raising any other concerns regarding your absence record or your return to work

### **Managing long-term or persistent absence**

12. The following paragraphs set out our procedure for dealing with long-term absence or where your level or frequency of short-term absence has given us cause for concern. The purpose of the procedure is to investigate and discuss the reasons for your absence, whether it is likely to continue or recur, and whether there are any measures that could improve your health and/or attendance. We may decide that medical evidence, or further medical evidence, is required before deciding on a course of action.

13. The Company will notify you in writing of the time, date and place of any meeting, and why it is being held. The Company will usually give you a week's notice of the meeting.

- a. Meetings will be conducted by your Line Manager.

- b. You may bring a companion to any meeting or appeal meeting under this procedure. Your companion may be either a trade union representative or a colleague, who will be allowed reasonable paid time off from duties to act as your companion.
- c. If you cannot attend at the time specified you should let us know as soon as possible and we will try, within reason, to agree an alternative time.
- d. If you have a disability, we will consider whether reasonable adjustments may need to be made to the sickness absence meetings procedure, or to your role or working arrangements.

### **Initial Sickness Absence Meetings**

14. The purposes of a sickness absence meeting or meetings will be to discuss the reasons for your absence, how long it is likely to continue, whether it is likely to recur, whether to obtain a medical report, and whether there are any measures that could improve your health and/or attendance.

15. In cases of long-term absence, we may seek to agree a return-to-work programme, possibly on a phased basis.

16. In cases of short-term, intermittent absence, we may set a target for improved attendance within a certain timescale.

### **If Matters do not Improve**

17. If after a reasonable time, you have not been able to return to work or if your attendance has not improved within the agreed timescale, we will hold a further meeting or meetings. We will seek to establish whether the situation is likely to change and may consider redeployment opportunities at that stage. If it is considered unlikely that you will return to work or that your attendance will improve within a short time, we may give you a written warning that you are at risk of dismissal. We may also set a further date for review.

### **Final Sickness Absence Meeting**

18. Where you have been warned that you are at risk of

dismissal, and the situation has not changed significantly, we will hold a meeting to consider the possible termination of your employment. Before we make a decision, we will consider any matters you wish to raise and whether there have been any changes since the last meeting.

## **Appeals**

19. You may appeal against the outcome of any stage of this procedure. If you wish to appeal you should set out your appeal in writing to your Line Manager, stating your grounds of appeal, within one week of the date on which the decision was sent or given to you.

20. If you are appealing against a decision to dismiss you, we will hold an appeal meeting, normally within two weeks of receiving the appeal. This will be dealt with impartially and, where possible, by a more senior director who has not previously been involved in the case.

21. We will confirm our final decision in writing, usually within one week of the appeal hearing. There is no further right of appeal.

22. The date that any dismissal takes effect will not be delayed pending the outcome of an appeal. However, if the appeal is successful, the decision to dismiss will be revoked with no loss of continuity or pay.

Updated: January 2020

# Equal Opportunities Policy

1. It has and will continue to be the policy of Universify Education to ensure equal opportunities in employment and receipt of contracts without discrimination on the basis of race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation, age, disability, gender reassignment, citizenship, marital or civil partner status, pregnancy or maternity or any other characteristic protected by law (hereinafter referred to as "Protected Characteristics") except where explicitly provided for by law.
2. All Staff and students ("Stakeholders") are evaluated on their skills and abilities without regard to any Protected Characteristic. This policy permeates all decisions, including but not limited to those involving Stakeholder compensation, benefits, hiring, promotion, training and development, and other terms and conditions of employment. Moreover, we believe that no Staff Member should ever be subjected to a work environment that is hostile because of a Protected Characteristic.
3. All Stakeholders should be able to enjoy a work environment free from all forms of discrimination; including harassment. Thus, this organization strictly prohibits and will not tolerate any such discrimination or harassment by any of its Stakeholders. Any Stakeholder who feels they are a victim of such discrimination must follow the procedures set forth set forth in this procedure and/or the Anti-Harassment Policy as applicable.

## **Discrimination**

4. Staff and Volunteers must not unlawfully discriminate against or harass other people including current and former Staff, job applicants, clients, students and visitors. This applies in the workplace, outside the workplace (when dealing with students, customers or other work-related contacts), and on off-site trips or events, including social events.
5. The following forms of discrimination are prohibited under this policy and are unlawful:
  - a. Direct discrimination: treating someone less favourably because of a Protected Characteristic. For example, rejecting a job applicant because of

their religious views or because they might be gay;

- b. Indirect discrimination: a provision, criterion or practice that applies to everyone but adversely affects people with a particular Protected Characteristic more than others and is not justified. For example, requiring a job to be done full-time rather than part-time would adversely affect women because they generally have greater childcare commitments than men. Such a requirement would be discriminatory unless it can be justified.
- c. Harassment: this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.
- d. Victimisation: retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
- e. Disability discrimination: this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

## **Recruitment and Selection**

6. Recruitment, promotion and other selection exercises such as redundancy selection will be conducted on the basis of merit, against objective criteria that avoid discrimination. Shortlisting should be done by more than one person if possible.

7. Vacancies should generally be advertised to a diverse section of the labour market. Advertisements should avoid stereotyping or using wording that may discourage particular groups from applying.

8. Job applicants should not be asked questions which might suggest an intention to discriminate on grounds of a Protected Characteristic. For example, applicants should not be asked whether they are pregnant or planning to have children.

9. Job applicants should not be asked about health or disability before a job offer is made, except in the very limited circumstances allowed by law: for example, to check that the applicant could perform an intrinsic part of the job (taking account of any reasonable adjustments), or to see if any adjustments might be needed at interview because of a disability. Where necessary, job offers can be made conditional on a satisfactory medical check. Health or disability questions may be included in equal opportunities monitoring forms, which must not be used for selection or decision-making purposes.

## **Disabilities**

10. If you are disabled or become disabled, we encourage you to tell us about your condition so that we can consider what reasonable adjustments or support may be appropriate. Please refer to our separate Disability Policy.

## **Transgender Staff and Students**

11. Universify Education supports transgender students and staff in their right to be accommodated with students of the gender they identify with.

12. If a student defines as a gender non-conforming individual, including but not limited to non-binary or gender-fluid, they have the right to choose which accommodation they would like to be accommodated in.

## **Part-time and Fixed-Term Work**

13. Part-term and fixed-term Staff Members should be treated the same as comparable full-time or permanent Staff Members and enjoy no less favourable terms and conditions (on a pro-rata basis where appropriate), unless different treatment is justified.

## **Breaches of this Policy**

14. We take a strict approach to breaches of this

policy, which will be dealt with in accordance with our Disciplinary and Capability Procedure. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.

15. If you believe that you have suffered discrimination you can raise the matter through our Grievance Procedure or Anti-Harassment Policy. Complaints will be treated in confidence and investigated as appropriate.

16. You must not be victimised or retaliated against for complaining about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Disciplinary and Capability Procedure.

Updated: January 2020

# Anti-Harassment Policy

1. Universify Education is committed to providing a happy and satisfying environment in which all individuals are treated with respect and dignity. Each individual has the right to work in an atmosphere that promotes equal opportunities and prohibits discriminatory practices, including harassment. Therefore, this organization expects that all relationships among persons at Universify Education (be they Staff Members, volunteers, or students, herein referred to as “Stakeholders”) will be cordial and free of bias, prejudice and harassment.

2. The Charity takes claims of harassment, as well as the procedures outlined below very seriously.

3. We expect all Stakeholders to similarly appreciate the seriousness of these issues and ask that all Stakeholders report any violations of this policy as soon as they occur by utilizing the procedure set forth herein. Stakeholders must not only commit themselves to following this policy and acting appropriately if they become aware of or feel they are a victim of harassment, but the Company prohibits the misuse of this policy by Stakeholders. Interfering with the proper functioning of this policy or improper use of the procedures set forth herein will be considered gross misconduct and dealt with in accordance with our Disciplinary and Capability Policy.

## Definition of Harassment

4. Harassment, on the basis of a Protected Characteristic, is a form of discrimination and is strictly prohibited. Under this policy, harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment. It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

5. Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation, citizenship or any other characteristic protected by law or that of



his/her relatives, friends or associates. Harassment is unacceptable even if it does not fall within any of these categories.

6. Harassment may include, for example:

- a. Unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
- b. Unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
- c. Offensive e-mails, text messages or social media content;
- d. Mocking, mimicking or belittling a person's disability;
- e. The effect of creating an intimidating, hostile or offensive work environment;
- f. The purpose or effect of unreasonably interfering with an individual's work performance; or
- g. Otherwise adversely affects an individual's employment opportunities.

7. A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

8. Sexual harassment constitutes discrimination and is illegal under UK law. The Equal Employment Opportunity Commission Guidelines define sexual harassment as unwelcome sexual advances, requests for sexual favours and other verbal or physical conduct of a sexual nature when, for example:

- a. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
- b. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- c. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.
- d. In general terms, sexual harassment is unwanted sexual attention or conduct of a persistent or

offensive nature made by a person who knows, or reasonably should know, that such attention or conduct is unwelcome or sexually offensive. Sexual harassment does not refer to occasional compliments of a socially acceptable nature or even indications of affection, which are immediately ceased once a Stakeholder indicates that they are unwelcome.

- e. Sexual harassment, however, may include a range of subtle and not so subtle behaviours and may involve individuals of the same or different gender. Depending on the circumstances, these behaviours may include, but are not limited to: unwanted sexual advances or requests for sexual favours; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, catcalls or touching; insulting or obscene comments or gestures; display or circulation in the workplace of sexually suggestive objects or pictures (including through e-mail); and other physical, verbal or visual conduct of a sexual nature.

## **Individuals and Conduct Covered**

9. These policies apply to all applicants and Stakeholders, and prohibit harassment, discrimination and retaliation whether engaged in by fellow Stakeholders or by someone not directly connected to the Company (e.g. an outside vendor, consultant or customer). Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business-related social events.

10. The Company never condones or approves of any conduct in violation of this policy. The Charity Trustees are responsible for assuring that no Stakeholder is subjected to conduct that constitutes discrimination or harassment under this policy.

## **Complaints Policy**

11. If you are being harassed or bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult or embarrassing, you should speak to your Line Manager, who can provide confidential advice and assistance in

resolving the issue formally or informally.

12. If informal steps are not appropriate, or have not been successful, you should raise the matter formally under the Company's Grievance Procedure.

13. The Company will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. We will consider whether any steps are necessary to manage any on-going relationship between you and the person accused during the investigation.

14. Once the investigation is complete, we will inform you of our decision. If we consider you have been harassed or bullied by an employee the matter will be dealt with under the Disciplinary and Capability Procedure as a case of possible misconduct or gross misconduct. If the harasser or bully is a third party such as a customer, student or other visitor, we will consider what action would be appropriate to deal with the problem. Whether or not your complaint is upheld, we will consider how best to manage any on-going working relationship between you and the person concerned.

## **Protection and Support**

15. Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action under our Disciplinary and Capability Procedure.

## **Record-Keeping**

16. Information about a complaint by or about a Member of Staff may be placed on the Staff's personnel file, along with a record of the outcome and of any notes or other documents compiled during the process. Records relating to a complaint will be kept for three years. These will be processed in accordance with our Data Protection Policy.

Updated: January 2020

# Disability Policy

1. Universify Education is committed to equality of opportunity for disabled people in accordance with its legal duties.
2. The aims of this policy are:
  - a. Support the ethos of Universify Education as a community which respects the rights of disabled students, to have equal access to the curriculum, extra-curricular and other services.
  - b. Equally value and encourage all students.
  - c. Foster positive attitudes towards disability within our community.

## Definition of Disability

3. Disability is defined as a physical or mental impairment that has a substantial and long-term negative effect on the ability to perform normal daily activities, as defined by The Equality Act 2010. This does not include addiction to, or dependence on, alcohol or non-prescription drugs.

## Job Applicants and Staff

4. It is the policy of Universify Educations to ensure that no job applicant or Staff Member receives less favourable treatment on the grounds of a disability. This applies to:
  - a. accessibility of application forms;
  - b. interview arrangements;
  - c. aptitude or proficiency tests;
  - d. job offers;
  - e. terms of employment, including pay;
  - f. promotion, transfer, and training opportunities;
  - g. dismissal; or
  - h. discipline and grievances.
5. Universify Education may make limited enquiries into the health or disability of job applicants for the following purposes:

- a. to help decide whether the applicant can carry out a task that is an essential part of the work;
  - b. to help find out whether the applicant can take part in an interview; or
  - c. to help decide if the interviewers need to make reasonable adjustments for the applicant in the selection process.
6. Universify Education is committed to making reasonable adjustments to avoid a Member of Staff being placed at a disadvantage compared with non-disabled people in the workplace.

### **Course Participants**

7. It is the policy of Universify Education to ensure that no course applicant or course student receives less favourable treatment on the grounds of a disability. This applies to:
  - a. accessibility of application forms;
  - b. application requirements;
  - c. admission to the course;
  - d. terms of admission to the course, including cost;
  - e. discrimination arising from a disability;
  - f. harassment;
  - g. victimisation; and
  - g. dismissal from the course, discipline, and grievances.
8. Universify Education is committed to making reasonable adjustments to avoid a student or potential student being placed at a substantial disadvantage compared with non-disabled students on the course.

### **Physical Access**

9. Under the Equality Act 2010 the Company is not required to remove or alter physical features.
10. The College sites at which Universify Education run cover wide areas with many old buildings of more than one storey and without lifts. Students are required to move around the site in order to access their lessons, activities, the common room and sleeping areas. This may necessitate the use of steps or stairs in buildings to access classrooms. Students with impaired mobility

will therefore be somewhat disadvantaged by these problems.

11. Universify Education will wherever possible make reasonable adjustment to mitigate against these necessary constraints but is unable to alter the buildings or the physical features of the sites on which it is based.

## **Education**

12. Staff will continue to be made aware of students with disability or special educational needs by the Course Director.

13. Staff will continue to be made aware of strategies to make "reasonable adjustments" within the classroom so as not to place disabled students at a substantial disadvantage in accessing the curriculum. Such strategies will be included in briefings sent to Staff before the start of the summer's Courses.

14. Staff will need to adapt their teaching to the learning patterns of all the students according to their abilities and needs. Such differentiation should be reflected in course outlines.

15. The implementation of reasonable adjustments to classroom management, teaching and expectations, should not prejudice the progress of other students or their health and safety.

16. Universify Education is not required under legislation to provide auxiliary support such as a classroom assistant, or auxiliary aids.

17. Universify Education will wherever possible make necessary arrangements to mitigate against these necessary constraints but is unable to alter the buildings or the physical features of the sites on which it is based.

## **Sporting & Recreational Activities**

18. Universify Education will continue to provide equal access to all course activities for disabled students, within the constraints of the physical nature of the site, the budgetary costs, the health and safety implications and difficulties of supervision.

19. Individual Risk Assessment and management

strategies will be provided for disabled students engaged in trips or activities.

20 Staff will continue to be made aware of students with disability or special educational needs by the Course Director.

### **Welfare Awareness**

21. Staff and students are to be made aware of disability and understand its effects and accept and support disabled students as part of the courses' life. This should be emphasised at the start of each course in the introductory talk and should be emphasised as necessary by the Group Leader of each group at registration meetings.

22. Universify Education's Equal Opportunities Policy, Anti-Bullying Policy, Codes of Behaviour and Student and Staff Handbooks, will be reviewed and updated to reflect the need for inclusiveness and regard to the difficulties faced by disabled students.

23. Universify Education will where necessary arrange with parent's appropriate regular means of communication with regard to the student's progress, behavioural issues and the effects of any medication.

Updated: January 2020

# Data Protection Policy

1. The Company needs to gather and use certain information about individuals. These can include customers, suppliers, business contacts, Staff Members, contractors, students, and other people the Company has a relationship with or may need to contact.
2. The policy describes how this personal data must be collected, handled and stored to meet the Company's data protection standards and to comply with General Data Protection Regulation (GDPR) and the law.

## Why This Policy Exists

3. This policy exists to ensure that the Company:
  - a. Complies with EU General Data Protection Regulation;
  - b. Protects the rights of Staff, customers and partners;
  - c. Is open about how it stores and processes individual's data;
  - d. Protects itself from the risk of data breach.

## Data Protection Law

4. The EU General Data Protection Regulation describes how organisations must collect, handle and store information. The rules apply regardless of how data is stored. In order to be compliant with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

## The Principles of EU General Data Protection Regulation

5. We will comply with the eight data protection principles in the DPA, which say that personal data must be:
  - a. Processed fairly and lawfully;
  - b. Processed for limited purposes and in an appropriate way;
  - c. Adequate, relevant and not excessive for the purpose;
  - d. Accurate;
  - e. Not kept longer than necessary for the purpose;
  - f. Processed in line with individuals' rights;
  - g. Secure; and
  - h. Not transferred to people or organisations situated



in countries without adequate protection.

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<sup>2</sup>This policy will continue to be reviewed and updated in line with the EU General Data Protection Regulation (the "GDPR").

6. "Personal data" means recorded information we hold about you from which you can be identified. It may include contact details, other personal information, photographs, expressions of opinion about you or indications as to our intentions about you. "Processing" means doing anything with the data, such as accessing, disclosing, destroying or using the data in any way.

## **Scope of this Policy**

7. This policy applies to the Company, including Staff Members, contractors and all other people working on behalf of the Company. The policy applies to all data that the Company holds relating to identifiable individuals, even if that information technically falls outside of the DPA.

## **Data Protection Risks**

8. This policy helps the Company to identify data security risks, including:
- a. Breaches of confidentiality;
  - b. Failure to offer choice in how data is used;
  - c. Reputational damage (for instance suffered if those outside the company gained access to sensitive data held by the Company).

## **Responsibilities**

9. Everyone who works for or with the Company has some responsibility for ensuring that data is collected, stored and handled appropriately. Everyone who handles data must ensure that it is handled and processed in line with this policy and with wider data protection principles.

10. The Charity Trustees are ultimately responsible for the Company meeting its legal obligations with regards Data Protection. The Charity is not obliged, because of its size, to have a Data Protection Officer, but it is imperative that the company meets responsibilities for:

- a. Keeping the Charity Trustees updated about the

- responsibilities, risks and issues with regards Data Protection;
- b. Reviewing all data protection policies and related policies, in line with an agreed schedule;
  - c. Arranging data protection training and advice for the people covered by this policy;
  - d. Handling data protection questions from Staff and anyone covered by this policy;
  - e. Dealing with subject access requests from individuals;
  - f. Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data;
  - g. Ensuring all systems, services and equipment used for storing data meet acceptable security standards;
  - h. Performing regular checks and scans to ensure security hardware and software is functioning properly;
  - i. Valuating third-party services that the company is considering using to process or to store data (e.g. cloud computing services such as Google Docs or Dropbox);
  - j. Approving any data protection statements attached to communications such as emails and letters;
  - k. Addressing any new data protection queries from third parties; and
  - l. Where necessary, working with other Staff to ensure marketing initiatives abide by data protection law.

## **General Staff Guidelines**

11. These are as follows:

- a. Only those people who need data for their work should be able to access it.
- b. Data should not be shared informally.
- c. The Company will provide training to all Staff Members to help them to understand their responsibilities when handling data.
- d. Staff Members should keep all data secure, by following these guidelines and taking all sensible precautions.
- e. Strong passwords should be used and should never be shared.
- f. Personal data should not be disclosed to unauthorised people.

- g. Data should be reviewed and updated.
- h. Staff Members should request help from their Line Manager or the Data Protection Officer if they are unsure about any aspect of data protection.

## **Storage of Data**

### **12. When Data is stored on Paper:**

- a. It should be kept in a secure place where unauthorised people cannot see it;
- b. When it is not required, the paper or files should be kept in a locked drawer or filing cabinet;
- c. Staff Members should make sure paper and printouts are not left where unauthorised people can see them; and
- d. Data print outs should be shredded and securely disposed of when no longer required.

### **13. When Data is stored Electronically:**

- a. it should be protected by strong passwords that are changed regularly and are never shared between Staff Members;
- b. if data is stored on removable media, these should be kept locked away securely when not being used;
- c. Data should only be stored on designated drives and servers and only uploaded to an approved cloud computing service;
- d. Servers containing personal data should be located securely away from the main office space;
- e. Data should be backed up frequently and the backups should be tested regularly;
- f. Data should never be saved directly to mobile devices like tablets or smartphones; and
- g. All servers and computers should be protected by approved security software and a firewall.

## **Data Use**

14. When working with personal data, Staff Members should ensure that the screens of their computers are always locked when left unattended. Personal data should not be shared informally. Staff Members should not save copies of personal data

to their own computers.

### **Data Accuracy**

15. Data should be held in as few locations as possible in order to better ensure the accuracy of data. Data should be updated as inaccuracies are discovered. For example, by changing or removing data that is inaccurate.

### **Subject Access Requests**

16. All individuals who are the subject of personal data held by Universify Education are entitled to:

- a. Ask what information the company holds about them and why;
- b. Ask how to gain access to it;
- c. Be informed how to keep it up to date; and
- d. Be informed how the company is meeting its data protection obligations.

17. The company can supply a standard request form; however, there is no requirement to use this. Individuals will not be charged to access their data. The data should be provided within 28 days. The Data Controller should always verify the identity of the person making the subject access request.

### **Disclosing Data for other reasons**

18. The law allows for, in certain situations, personal data to be shared with law enforcement agencies without the consent of the data subject. In these circumstances the Company will disclose the requested data, but only after ensuring that the request is legitimate and where necessary taking legal advice.

Updated: January 2020

# Health and Safety Policy

1. We are committed to ensuring the health and safety of our Staff and students and to providing a safe environment for all those attending our premises through regular assessments of risks in the work and study place.

2. In particular, we are committed to maintaining safe and healthy working and studying conditions through the control of the health and safety risks arising from our activities, and equipment; ensuring the safe handling and use of substances; consulting with our Staff and providing appropriate information, instruction, training and supervision; and taking steps to prevent accidents and cases of work-related ill health.

## **What is covered by this Policy**

3. In accordance with our health and safety duties, we are responsible for:

- a. Assessing risks to health and safety and identifying ways to overcome them.
- b. Providing and maintaining a healthy and safe place to work and study and a safe means of entering and leaving our premises, including emergency procedures for use when needed.
- c. Providing information, instruction, training and supervision in safe working methods and procedures as well as working areas and equipment that are safe and without risks to health.
- d. Ensuring that equipment has all necessary safety devices installed and that equipment is properly maintained.
- e. Promoting co-operation between Members of Staff to ensure safe and healthy conditions and systems of work by discussion and effective joint consultation.
- f. Regularly monitoring and reviewing the management of health and safety, and thereafter making any necessary changes and bringing those to the attention of all Staff and students, as appropriate.

## **Personnel responsible for the implementation of this Policy**

4. The Charity Trustees have overall responsibility for health and safety and the operation of this policy. The Charity Trustees are responsible for:

- a. The implementation of this policy statement and keeping it under review;
- b. Ensuring safety inspections are carried out;
- c. Ensuring that legal requirements are met, for example notifying any accidents reportable under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013); and
- d. Ensuring that any necessary health and safety risk assessments are undertaken regularly, and any recommendations are recorded and implemented.

The Charity Trustees may delegate the delivery of these responsibilities but retain ownership.

5. All Members of Staff have a duty to look after their own and others' health and safety. In addition, all Staff have a duty under common law to take care of students in the same way that a prudent parent would.

6. As such it is the responsibility of Members of Staff (teaching and non-teaching), to ensure that the relevant Head Office staff member is informed of any hazards present at Universify Education. In practice, this means 'if you see something which you consider to be a hazard' report it. These reports should be confirmed in writing.

7. There are several Acts of Parliament covering safety in schools including the Health and Safety at Work Act 1974 (HAS), and the regulations under that Act in particular the Management of Health and Safety at Work Regulations 1999; the Control of Substances Hazardous to Health Act 2002 (COSHH); and the Children's Act 2004; and all amendments to these Acts; as well as various Department for Education and Skills (DfES) regulations and Home Office regulations.

8. Health and Safety law requires the employer to assess the risks to health and safety. This does not mean that a separate written risk assessment is required for every activity as long as Universify Education has undertaken a common sense and proportionate approach. Where a risk assessment is carried out

however, a written record must be kept of the significant findings of the assessment.

## **Code of Practice**

9. A clean and orderly environment is essential for students and Staff of Universify Education. Residential Staff have a particular responsibility for ensuring that student accommodation, Staff rooms and common rooms are neat and tidy in order that cleaning Staff may undertake their duties. It is not the duty of the cleaning Staff to tidy up the personal belongings of students or Staff.

10. Periodic checks of the contents and layout of rooms should be made by Group Leaders and any other residential staff. Defective equipment, fittings and furniture should be reported immediately to the Course Director.

### **11. Key guidelines**

- a. Make sure that all fire exit doors are unlocked, and that all doors including fire doors are easy to open and free from obstruction.
- b. Ensure that free-standing furniture is not placed in such a position that it can be pushed over
- c. Avoid storing heavy equipment, materials etc. on top of tall cupboards and high shelves.
- d. Ensure that all floor areas are kept clear of obstructions other than furniture so that cleaning Staff are able to work safely and efficiently.
- e. As far as practicable, keep working surfaces clear so that cleaners can wipe down as necessary
- f. Report any insecure wall-mounted units.
- g. Make sure that light sockets are not left without a bulb, to avoid the possibility of electric shock
- h. Do not leave electric power cables, leads etc. trailing across the floor.
- i. Switch off and un-plug electrical equipment after use.
- j. Edged or pointed tools (such as scissors, knives, and compasses) should be regularly checked for damage and stored safely.
- k. Aerosol containers should be kept in a safe, cool place to which they should be returned after use. They should never be left in direct sunlight.

## Training

12. All Staff (whether temporary or permanent) will receive adequate training in health and safety to ensure that all Staff are competent to undertake their work safely and efficiently. For all new permanent staff Head Office will ensure that they receive the adequate training, for seasonal staff, volunteers, and tutors the Programme Manager will ensure they are adequately trained in Health and Safety.

## Emergency Evacuation and Fire Precautions

13. If the fire alarm sounds the following guidelines will apply:
- a. Staff will be informed of the specific emergency assembly points for each site during the pre-course briefing. Students will be informed in the Welcome talk at the start of each course and shown where the assembly point is.
  - b. All students and staff shall undertake a fire drill on the first day of the course.
  - c. All students and all Staff will proceed at once to the assembly area, remaining calm and walking quickly.
  - d. Close windows and doors as you go, but do not waste time doing so – getting out is more important.
  - e. Evacuate the building as quickly as possible at the nearest possible exit, including fire exits.
  - f. Do not stop to collect personal possessions.
  - g. Do not go back into the building until you are told it is safe to do so.
  - h. Outside normal hours, the front doors may be locked. Emergency keys are located at the College lodge.
  - i. For sites where there is no porter's lodge Course Directors will be informed of the location of emergency keys in the pre-course briefing.
14. If the fire alarm sounds during the hours of 7.00am-5.00 pm, students should assemble according to their student groups where the Group Leader or a staff member from their student group will call out the names of those students to ensure that everyone is present.
15. If the fire alarm sounds between the hours of 5.00pm



and 7.00am students should assemble in their relevant age groups. Group Leaders will then call of the names of those students to ensure that everyone is present.

16. The Group Leader should then report any missing students to the Course Director.

17. In the event of a real fire, the persons calling the roll should then go through the lists again and satisfy themselves that every student is indeed present. The student list should be checked with the signing-out book.

18. Adult employees should also be checked by the Course Director. To aid this process, checklists are kept in the Staff office.

19. In the event of a fire call 999 as soon as possible. On College telephones dial 9 – wait for a tone, then dial 999.

20. No-one may re-enter the building until given permission by the Course Director, or the Group Leader in the event of a fire practice, or by the Emergency services (in the event of a fire).

21. In accordance with the training statement above, all Staff (and students) will be trained to ensure they know what to do when they hear the fire alarm. If necessary, additional and repetitive training will be available.

22. If you discover a fire, you should not attempt to tackle it unless you have been trained or feel competent to do so. Never put yourself or anyone else in danger. You should operate the nearest fire alarm and, if you have sufficient time, call the Course Director or a senior Member of Staff and report the location of the fire.

23. All Staff should familiarise themselves with the instructions about what to do in the event of fire which are displayed on notice boards throughout the College. You should also know where the fire extinguishers are and ensure that you are aware of your nearest fire exit and alternative ways of leaving the building in an emergency.

### **Other Specific Hazards**

24. There are many potential hazards, this list outlines

examples of some, but not all, of these hazards.

- a. Student should not enter or make use any of the College kitchens; this should be made clear at the introductory talk at the start of the course.
- b. Litter must not be allowed to accumulate in such a way as could lead to a fire hazard. Empty tins should not be discarded thoughtlessly, especially on the lawns and fields, where they will be mown and become dangerous.
- c. Broken windows should be reported immediately. Students should NOT be asked to pick up broken glass. If necessary, a temporary barrier could be erected using chairs.
- d. Electrical work should be undertaken by persons who are employed to do it. This normally means external electrical contractors. Faulty equipment, loose, worn or

- frayed wiring, damaged plugs etc. should be reported immediately. Do not attempt to fix it yourself.
- e. Students must be made aware of the dangers of traffic in the UK and should be clearly informed of the fact that traffic drives on the left in the UK as part of the induction.
- f. When overhead work is being carried out, an area should be roped off to prevent danger to passers-by. Students must not climb ladders, scaffolding towers etc. They must not go on the College roof.

## **Equipment**

25. All Staff and students must use equipment in accordance with operating instructions, any instructions given by relevant teaching Staff and any relevant training. Any fault with, damage to, or concern about any equipment or its use must immediately be reported to the Course Director. No person should attempt to repair equipment unless trained and designated to do so.

## **First Aid**

26. There are first-aid boxes held by the Course Director and at the College Lodge. If you use items from these boxes, please inform the Course Director so that they can be re-stocked immediately.

## **Reporting for Employees**

27. The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) applies to schools. The Charity Manager will be responsible for reporting and investigating any incident under RIDDOR. Accidents which result in death or major injury must be reported immediately.

28. Major injury includes but is not limited to:
- a. a fracture other than to fingers, thumbs and toes;
  - b. amputation;
  - c. dislocation of shoulder, hip, knee or spine;
  - d. loss of sight (temporary or permanent);

- e. chemical or hot metal burn to the eye or any penetrating injury to the eye;
- f. injury resulting from an electric shock or electrical burn leading to unconsciousness;
- g. loss of consciousness caused by asphyxia or exposure to a harmful substance or biological agent;
- h. either of the following conditions which result from the absorption of any substance by inhalation, indigestion, or through the skin:
  - i. an acute illness requiring medical treatment;
  - j. loss of consciousness; or
  - k. acute illness requiring medical treatment where there is reason to believe that this resulted from exposure to biological agents, its toxins or infected material.

29. Any injuries that lead to a worker or a student being incapacitated for over 2 consecutive days (including weekends) needs to be reported. The report must be made within 24 hours of the accident.

30. Any reported cases of a work-related disease specified under RIDDOR, that affects an employee or a student and that a doctor confirms in writing.

### **Reporting for Students**

31. RIDDOR relevant injuries, illnesses and occurrences to students must be reported to the Programme Manager who will report the to the Charity Manager. Injuries to students and visitors who are involved in an accident at Universify Education are only reportable under RIDDOR if:

- a. The accident results in the death of the person and arose out of, or in connection with, course activity; or
- b. The accident results in an injury that arose out of, or in connection with, a course activity and the person is taken from the scene of the accident to hospital.
- c. Any injury to a student whereby the

student is taken from the scene of the accident to hospital will need to be reported under RIDDOR if it transpires to be serious.

### **National Health Alerts**

32. In the event of an epidemic or pandemic alert we will organise our operations and provide advice on steps to be taken by Staff, students and parents/guardians in accordance with official guidance, to reduce the risk of infection at the College as far as possible. Any questions should be referred to the Course Director.

### **Insurance**

33. The College has a wide and comprehensive range of insurance. Staff wishing to know any particular details should contact the Programme Manager.

### **Review of Policy**

34. Safety is an on-going concern. Additions to this policy can be made at any time in the future, for example if new course activities are added. Recommendations for any amendment to this policy should be reported to the Charity or Charity Trustees. This policy will be continually reviewed to ensure that it is achieving its stated objectives.

Updated: January 2020

# Risk Management Policy

## Introduction

1. The purpose of this policy is to ensure that adverse risks are minimised in order to maximise the potential of Universify Education. The policy has been written in accordance with the Charity Commission Risk Management Guidelines (CC26).
2. According to the Charity Commission's Risk assessment guidelines risk can be defined as "Anything that could prevent your charity achieving its aims or carrying out its strategies..."
3. All staff and volunteers at Universify Education are made aware of the potential risks the organisation may face and the procedures that are in place as part of their induction training.
4. This risk management policy should be used by trustees, directors, staff and volunteers to support Universify Education's internal processes. This will enable the organisation to respond to operational, strategic and financial risks regardless of whether they are internally or externally driven.

## Responsibilities

5. Trustee and directors are to;
  - a. Embed the risk management culture throughout Universify Education.
  - b. Set levels of risk tolerance for the organisation as a whole and in specific circumstances.
  - c. Communicate the charity's approach and report on risk management to the whole organisation
  - d. Set standards of conduct expected of staff and volunteers
  - e. Ensure that risk management is included when considering strategic decisions. The trustees and directors of the charity must believe that sound risk management is integral to both good management and good governance practice.
6. Risk management forms an integral part of Universify Education's decision-making and should be incorporated within strategic and operational planning.
7. Risk assessment should be conducted on all new activities and projects to ensure they are harmonised with the charity's objectives and mission.

8. According to the Company Charities legislation in the case of substantial risks and uncertainties the trustees and directors have the duty to report them.

9. Any risks or opportunities arising will be identified and reported to Universify Education trustees and directors. The insurer must also be kept up to date if any risks have been identified or there are any changes to Universify Education activities.

### **Areas to consider when assessing risk;**

As part of the risk-management process Universify Education assesses the following risks.

1. Strategic management
  - a. Universify Education strategies are reviewed annually and reported in the yearly impact report. The strategic planning process is to ensure that risks to the Charity are recognised and controlled where possible.
2. Health and safety
  - a. It is the responsibility of all trustees, directors, staff and volunteers to understand and apply the Health and Safety Policy. All will be provided with adequate training on risk management and their role and responsibilities in implementing this. If potential physical health and safety risks arise or individual error or incidents occur the trustees and directors should be informed, and further risk assessment should be performed either inhouse or externally.
3. Technical
  - a. All changes to Universify Education Policies must be amended in accordance with the current legislations governing youth activities such as;
    - i. Safeguarding
    - ii. The Children Act 2004
    - iii. Legal responsibilities that include complying with the Law and legislation such as; Companies House, Charity Commission, Employment legislations
4. Financial
  - a. As part of the strategic planning Universify Education are to assign and manage budgets. Universify Education expenditures and donations should be accurately recorded and regularly reviewed. This is to monitor the economic and financial effects of the charities' activities and prevent fraudulent activities.
  - b. Accurate records will assist in the projection of

Universify Education development.

This list is not definitive or exhaustive and will be updated to take into account changes to Universify Education policies, legislation and best practice.

### **Reviewing risk**

10. The charity will review and monitor the effectiveness of its risk management framework quarterly and update it as considered appropriate.

11. Any emerging high concern risks agreed by the trustees and directors will be assessed and evaluated to ensure high quality solutions in order not to damage Universify Education's potential to develop as a Charity and perform the Charity's activities.

Updated: January 2020



# On-Course Incident Response Policy

1. Universify Education is committed to a safe and secure environment for all staff and students. The Incident Response Policy will ensure that any emerging issues are dealt with quickly, safely and appropriately. The first course of action in any emergency will be to call the Emergency Services.

## **Incident Management**

2. The senior Universify Education on-course team member will act as the Incident Manager. They will remain the Universify Education point of contact for the incident, and will co-ordinate any on-site and post event actions that are required to deal with the situation.

3. By default, the Course Director of the relevant course will become the Incident Manager at the onset of any emerging incident or issue, including for incidents on multi-site courses. In the absence of the Course Director, this role will default to the Deputy Course Director. Usually, incident management will be passed back to the Course Director on their return. Where the incident occurs where the Course Director or Deputy Course Director are not present, the senior staff member will take control of the situation.

4. When an incident or an abnormal event occurs or emerges, the Incident Manager must inform the Universify Education Emergency Contact. The Emergency Contact will be kept aware and monitor the ongoing situation and determine whether and when to inform the Programme Manager.

5. The Incident Manager will remain in full control of the situation unless the Emergency Contact judges that:

- a. The on-site team needs additional co-ordination and management support
- b. The situation cannot be effectively controlled or managed by the on-site team
- c. The situation has escalated

6. The Incident Manager must inform the Porter's Lodge immediately if the incident occurs on College grounds and the emergency services have been called. All Course Directors and Deputy Course Directors must be familiar with their sites' Incident Response protocols (including fire procedures).

### **Emergency Contact**

7. The Emergency Contact procedure is in place throughout all periods of Universify Education course delivery. Emergency Contacts are drawn from the Head Office team to ensure that there is no conflict of responsibilities for on-course staff.

8. The duty period is Friday 9am to the following Friday 9am, beginning the Friday before any course begins, for use out of office hours (9-6) including at weekends.

9. The Emergency Contact is planned, owned and distributed by the Universify Education's Head Office team, and published to all permanent staff, Course Directors, Deputy Course Directors and Group Leaders. The duty can be filled by all appropriate Head Office individuals.

10. Each oncoming Emergency Contact will message all permanent staff, CDs and Deputy CDs, by noon on Monday, to remind them of their contact details. CDs/Dep CDs will pass on these details to their Group Leader team.

11. The Emergency Contact will normally be contacted by the CD/Dep CD. Group Leaders will make direct contact when the CD and Dep CD are unavailable or uncontactable.

12. The Emergency Contact should be called when:

- a. Anything occurs out of the ordinary
- b. The emergency services have been called in relation to an Universify Education student or staff member
- c. The press or local/university authorities are or are likely to be involved
- d. Any safeguarding issue

If in doubt and when in need of advice, the Emergency Contact should always be called.

### **Universify Education Requirements**

13. Every incident will be different and will demand a different response by Universify Education. However, the following are Universify Education standard requirements:

- a. Universify Education Student hospital admissions – refer to Para 16 of the Medical and First Aid Policy. If a staff or student member is taken by the emergency services to the hospital, the same rules apply; a member of Universify Education staff must attend the hospital until the Incident Manager determines otherwise (in consultation with medical staff). Universify Education staff who are accompanying an employee or a student should be relieved within three hours of being at the hospital, and regular contact should be maintained by the Incident Manager with those staff members.
- b. Notify parents /guardian or next of kin when there is or has been a danger to the Student's life or wellbeing. This phone call must be made by either the Course Director or a member of the Head Office team.
- c. Begin an Incident Management Register and record all actions and decisions, with timings and individuals involved. Once the incident is closed, the register will form the basis of the Head Office report and any subsequent review.
- d. Consider the need for professional support for those Students or Staff who have been closely involved in, or feel impacted by, the incident. This can be accessed through Head Office or through regional and national support numbers:
  - i Samaritans (free to call from any phone) 116 12
  - ii ChildLine (support to children up to the their 19<sup>th</sup> birthday) 0800 1111

# Anti-corruption and Bribery Policy

1. It is the Company's policy to conduct all business in an honest and ethical manner. Universify Education takes a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships.

2. Any Member of Staff or student who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

3. This policy does not form part of any Staff Member's contract and we may amend it at any time. It will be reviewed regularly.

## **Who must comply with this policy?**

4. This policy applies to all persons working for us or on our behalf in any capacity, including Staff at all levels, directors, officers, agency workers, seconded workers, volunteers, students, interns, agents, contractors, external consultants, third-party representatives and business partners. It also applies to any students attending one of our courses.

## **What is Bribery?**

5. Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.

6. Bribery includes offering, promising, giving, accepting or seeking a bribe. All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with your Line Manager. Specifically, you must not:

- a. Give or offer any payment, gift, hospitality or other benefit in the expectation that an advantage will be

- received in return, or to reward any advantage received;
- b. Accept any offer from a third party that you know or suspect is made with the expectation that we will provide an advantage for them or anyone else; and
  - c. give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure.
7. You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

### **Gifts and Hospitality**

8. This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or marketing our products and services. Gifts up to the value of £100 are acceptable as long as they are reported either to the Course Director (if during the course) or the Programme Manager (if outside of the summer). Course Directors must report gifts to the Programme Manager.
9. A gift or hospitality will not be appropriate if it is unduly lavish or extravagant, or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations or a tender process).
10. Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers), or be given in secret. Gifts must be given in our name, not your name.
11. Promotional gifts of low value such as branded stationery may be given to or accepted from existing customers, suppliers and business partners.
12. You must declare and keep a written record of all hospitality or gifts given or received. All accounts, invoices, and other records relating to dealings with third parties including students and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to

facilitate or conceal improper payments.

### **How to raise a Concern**

13. If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must report it in accordance with our Whistleblowing Policy as soon as possible.

Updated: January 2020

# Whistleblowing Policy

1. Universify Education are committed to conducting business with honesty and integrity and we expect all Staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

2. This policy covers all Staff, officers, consultants, contractors, volunteers, interns, casual workers and agency workers. This policy does not form part of any Staff Member's contract and the Company may amend it at any time.

## **What is Whistleblowing?**

3. Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to our activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations.

## **How to raise a Concern**

4. We hope that in many cases you will be able to raise any concerns with your Line Manager. However, where you prefer not to raise it with your Line Manager for any reason, you should contact any Charity Trustee.

5. We will arrange a meeting with you as soon as possible to discuss your concern. You may bring a colleague or professional representative to any meetings under this policy. Your companion must respect the confidentiality of your disclosure and any subsequent investigation.

## **Confidentiality**

6. We hope that you will feel able to voice whistleblowing concerns openly under this policy. Completely anonymous disclosures are difficult to investigate. If you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

## **External Disclosures**

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

8. The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to anyone external. Public Concern at Work operates a confidential helpline. Their contact details are at the end of this policy.

### **Protection and Support for Whistleblowers**

9. We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.

10. Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform your Line Manager immediately. If the matter is not remedied you should raise it formally using our Grievance Procedure.

11. You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action. In some cases, the whistleblower could have a right to sue you personally for compensation in an employment tribunal. However, if we conclude that a whistleblower has made false allegations maliciously or with a view to personal gain, the whistleblower may be subject to disciplinary action.

12. Public Concern at Work operates a confidential helpline. Their contact details are:

Public Concern at Work (Independent whistleblowing charity)	Helpline: (020) 7404 6609 E-mail: whistle@pcaw.co.uk Website: www.pcaw.co.uk
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Updated: January 2020



# IT and Communications Systems Policy

1. Universify Education's IT and communications systems are intended to promote effective communication and working practices as well as the safety and welfare of students. This policy outlines the standards you must observe when using these systems, when we will monitor their use, and the action we will take if you breach these standards. For staff a breach of this policy may be dealt with under our Disciplinary and Capability Procedure and, in serious cases, may be treated as gross misconduct leading to summary dismissal.
2. For students, a breach of this policy may be dealt with under our Student Discipline Policy.
3. This policy does not form part of any Staff Member's contract and the Company may amend it at any time.

## **Equipment Security and Passwords**

4. You are responsible for the security of the equipment allocated to or used by you, and you must not allow it to be used by anyone other than in accordance with this policy. You should use passwords on all IT equipment, particularly items that you take out of the office. You should keep your passwords confidential and change them regularly.
5. You must only log on to our systems using your own username and password. You must not use another person's username and password or allow anyone else to log on using your username and password.
6. If you are away from your desk you should log out or lock your computer. You must log out and shut down your computer at the end of each working day.

## **Systems and Data Security**

7. Staff Members should not delete, destroy or modify existing systems, programs, information or data (except as authorised in the proper performance of their duties).

8. Staff Members must not download or install software from external sources without authorisation from their Line Manager. Downloading unauthorised software may interfere with our systems and may introduce viruses or other malware.
9. Staff Members must not attach any device or equipment including mobile phones, tablet computers or USB storage devices to the Company's systems without authorisation from their Line Manager.
10. The Company monitors all e-mails passing through the system for viruses. Staff Members should exercise particular caution when opening unsolicited e-mails from unknown sources. If an e-mail looks suspicious do not reply to it, open any attachments or click any links in it.
11. Inform your Line Manager immediately if you suspect your computer may have a virus.

## Email

12. Adopt a professional tone and observe appropriate etiquette when communicating with third parties by e-mail. Staff should also include the Company's standard e-mail signature and disclaimer.
13. Staff Members who have an Universify Education email address should use it to communicate with students.
14. Staff Members that lack a Universify Education email address should copy in [info@universifyeducation.com](mailto:info@universifyeducation.com) into all email communication. Failure to do so will be regarded as breach of contract
15. Remember that e-mails can be used in legal proceedings and that even deleted emails may remain on the system and be capable of being retrieved.
16. Staff must not send abusive, obscene, discriminatory, racist, harassing, derogatory, defamatory, pornographic or otherwise inappropriate e-mails.
17. Staff should not:

- a. send or forward private e-mails at work which you would not want a third party to read;
  - b. send or forward chain mail, junk mail, cartoons, jokes or gossip;
  - c. contribute to system congestion by sending trivial messages or unnecessarily copying or forwarding e-mails to others who do not have a real need to receive them; or
  - d. send messages from another person's e-mail address (unless authorised) or under an assumed name.
- 18. Permanent staff should not use their own personal e-mail account to send or receive e-mail for the purposes of the business. Staff should only use the e-mail account provided by the Company.

### **Using the Internet**

19. Internet access is provided solely for business purposes. Staff and students should not access any web page or download any image or other file from the internet which could be regarded as illegal, offensive, in bad taste or immoral. Even web content that is legal in the UK may be in sufficient bad taste to fall within this prohibition. As a general rule, if any person (whether intended to view the page or not) might be offended by the contents of a page, or if the fact that our software has accessed the page or file might be a source of embarrassment if made public, then viewing it will be a breach of this policy.

20. We may block or restrict access to some websites at our discretion.

### **Personal Use of Our Systems**

21. We permit the incidental use of our systems to send personal e-mail, browse the internet and make personal telephone calls subject to certain conditions. Personal use is a privilege and not a right. It must not be overused or abused. We may withdraw permission for it at any time or restrict access at our discretion. Internet access is provided solely for business purposes.

22. Personal use must meet the following conditions:

- a. it must be minimal and take place exclusively outside of normal working hours (that is, during your lunch break, and before or after work), common sense applies if you have a personal emergency;

- b. personal e-mails should be labelled "personal" in the subject header;
- c. it must not affect your work or interfere with the business;
- d. it must not commit us to any marginal costs; and
- e. it must comply with our policies including the Equal Opportunities Policy, Anti-harassment Policy, Anti- Bullying Policy, Data Protection Policy and Disciplinary and Capability Procedure.

## **Monitoring**

23. Our systems enable us to monitor telephone, e-mail, voicemail, internet and other communications. For business reasons, and in order to carry out legal obligations in our role as an employer, your use of our systems including the telephone and computer systems (including any personal use) may be continually monitored by automated software or otherwise.

24. We reserve the right to retrieve the contents of e-mail messages or check internet usage (including pages visited and searches made) as reasonably necessary in the interests of the business, including for the following purposes (this list is not exhaustive):

- a. to monitor whether the use of the e-mail system or the internet is legitimate and in accordance with this policy;
- b. to find lost messages or to retrieve messages lost due to computer failure;
- c. to assist in the investigation of alleged wrongdoing; or
- d. to comply with any legal obligation.

## **Prohibited Use of our Systems**

25. Misuse or excessive personal use of our telephone or e-mail system or inappropriate internet use will be dealt with under our Disciplinary and Capability Procedure. Misuse of the internet can in some cases be a criminal offence.

26. Creating, viewing, accessing, transmitting or downloading any of the following material will usually amount to gross misconduct (this list is not exhaustive):

- a. pornographic material (that is, writing, pictures,

- films and video clips of a sexually explicit or arousing nature);
- b. offensive, obscene, or criminal material or material which is liable to cause embarrassment to us or to our clients;
- c. a false and defamatory statement about any person or organisation;
- d. material which is discriminatory, offensive, derogatory or may cause embarrassment to others (including material which breaches our Equal Opportunities Policy or our Anti-Harassment Policy or Anti-Bullying Policy);
- e. confidential information about us or any of our Staff or students (except as authorised in the proper performance of your duties);
- f. unauthorised software;
- g. any other statement which is likely to create any criminal or civil liability (for you or us
- hi. music or video files or other material in breach of copyright.

Updated: January 2020

# Social Media Policy

1. This policy is in place to minimise the risks to the Charity, its staff and students through the use of social media. This policy deals with the use of all forms of social media, including Facebook, LinkedIn, Twitter, Google+, Wikipedia, Instagram and all other social networking sites, dating apps, internet postings and blogs. It applies to use of social media for business purposes as well as personal use that may Universify Education in any way.
2. This policy does not form part of any Staff Member's contract and the Company may amend it at any time.
3. This policy applies to the above matters before, during and following termination of the course.

## About Social Media

4. Social media forms an important part of Universify Education's marketing and communications effort both during and after the course. It provides an important and effective way to communicate with students during the course.
5. Even when utilised sensibly and with caution employees are vulnerable to their personal details being exposed to a wider audience than they might otherwise have intended.
6. Social media and the private communication opportunities that they offer to users raise potential issues around safeguarding – opening up staff members to serious accusations.

## Personal Use of Social Media

7. Occasional personal use of social media during working hours is permitted by Staff Members so long as it does not involve unprofessional or inappropriate content, does not interfere with your employment responsibilities or productivity and complies with this policy.

## Prohibited Use

8. Staff must avoid making any social media communications that could damage the Company's

business interests or reputation, even indirectly.

9. Staff must not interact with Universify Education's students using dating apps.
10. Staff must not use social media to defame or disparage the Company, other Staff, students, parents or any third party; to harass, bully or unlawfully discriminate against other Staff or third parties; to make false or misleading statements; or to impersonate colleagues or third parties.
11. Staff must not express opinions on the Company's behalf via social media, unless expressly authorised to do so by their Line Manager. Staff Members may be required to undergo training in order to obtain such authorisation.
12. Staff must not post comments about sensitive business-related topics, such as the Company's performance, or do anything to jeopardise confidential information and intellectual property. Staff must not include Company logos or other trademarks in any social media posting or in their profiles on any social media.
13. Staff should not use social media platforms to communicate with parents or students without prior consent from the Programme Manager.
14. Staff may choose to use a 'Universify Education' profile for the summer – allowing them to add students without exposing their personal and private online profiles to them – this may only happen with the authorisation of the Course Director.
15. Staff should not form on-line 'friendships' with parents or students using their real profiles (this includes adding students as contacts or following them on twitter or Instagram).
16. Staff should avoid establishing these relationships at the end of the course.
17. Staff must not post images of students to their personal social media accounts.
18. Any communication with students by staff using electronic media should be via a method which provides for the exporting of the conversation history (such as WhatsApp) so as to ensure the

safety of both staff and students.

19. Any misuse of social media should be reported to the Staff Member's Line Manager.

### **Guidelines for Staff Members for Responsible use of Social Media**

20. You should make it clear in social media postings, or in your personal profile, that you are speaking on your own behalf. Write in the first person and use a personal email address.
21. Be respectful to others when making any statement on social media and be aware that you are personally responsible for all communications which will be published on the internet for anyone to see.
22. If you disclose your affiliation with us on your profile or in any social media postings, you must state that your views do not represent those of Universify Education (unless you have been authorised to speak on our behalf). You should also ensure that your profile and any content you post are consistent with the professional image you present to students, colleagues and parents.
23. If you are uncertain or concerned about the appropriateness of any statement or posting, refrain from posting it until you have discussed it with your Line Manager.
24. If you see social media content that disparages or reflects poorly on us, you should contact your Line Manager.

### **Telephone Numbers**

25. It is part of the fast-paced life at Universify Education that staff will need to contact students about updates, or alert them to a change of plans. In such a scenario, the Staff Member should make use of the on-site duty mobile which will be the main way in which communication between students and Staff should occur. However, if the duty mobile is unavailable and it is necessary to contact a student using your own mobile device staff should include another staff member in all telephonic communications.
26. At the end of the course all staff must delete students' numbers from their phones.



## **Taking Photographs and Videos**

27. Recording activities, trips and other moments at Universify Education is important. It is best practice to use Universify Education equipment for this, but where that is not possible, Staff Members should use their personal cameras and ensure that the media created is transferred to a Company computer and then erased from the personal device as soon as possible. All content should be uploaded to the marketing Google Drive and then deleted off of personal devices.

28. In signing the Student Agreement before they arrive all students have consented to having their photo taken and to its use by Universify Education.

## **Use of Instant Messaging (IM) Services**

29. If using IM services to communicate with students, Staff should only use IM services which provide for a logging and easy exporting of a conversation thread which they should do on a semi-regular basis.

30. Staff should aim to always involve a Group Leader in their communications with students via IM services so as to ensure that their actions are open to scrutiny.

31. Staff should ensure that their messages are open and clearly phrased so as to avoid ambiguity of meaning or purpose.

## **Use of Universify Education Social Media Assets**

32. Universify Education has a presence on multiple social media platforms, including (but not limited to) Facebook, Twitter, Instagram, YouTube and Google+.

33. No Staff Member shall post to any of these platforms as Universify Education or on behalf of Universify Education without previous authorisation from the Programme Manager.

34. Staff should be mindful that in posting to Universify Education's pages on its Social Media Accounts they are acting as the Company and as such they are liable to bring the Company and the name of the Company into disrepute if they do so recklessly or without due thought.

35. The Social Media presence of the Company should be monitored by the Head Office team.
36. At the end of a staff members' term of employment the Marketing team will revoke their access to social media accounts.

### **Breach of this Policy**

37. Breach of this policy may result in disciplinary action up to and including dismissal. Any Member of Staff suspected of committing a breach of this policy will be required to co-operate with our investigation, which may involve handing over relevant passwords and login details.
38. You may be required to remove any social media content that we consider to constitute a breach of this policy. Failure to comply with such a request may in itself result in disciplinary action.

Updated: January 2020

# Alcohol and Drug Misuse Policy

1. Universify Education is committed to providing a safe, healthy and productive working environment. This includes ensuring that all staff are fit to carry out their jobs safely and effectively in an environment which is free from alcohol and drug misuse and that students are aware of, and abide by, the rules relating to alcohol and drugs.
2. The purpose of this policy is to ensure that:
  - a. All Staff and students are aware of their responsibilities regarding alcohol and drug misuse and related problems.
  - b. Staff or students who have an alcohol or drug-related problem are encouraged to seek help, in confidence, at an early stage.
  - c. Staff or students who have an alcohol or drug-related problem affecting their work are dealt with sympathetically, fairly and consistently.
3. This policy applies to incidents or offences caused by alcohol or drug misuse at or outside work which may damage our reputation, and where staff are likely to be dealt with under our Disciplinary and Capability Procedure, and for students who are likely to be dealt with under our Student Discipline Policy.
4. We will not accept Staff arriving at work under the influence of alcohol or drugs, and/or whose ability to work is impaired in any way by reason of the consumption of alcohol or drugs, or who consume alcohol (out-with organized events) or take drugs (other than prescription or over the counter medication, as directed) on the College site.
5. We will not accept students under 18 being under the influence of alcohol or drugs at any point during their time with us.
6. This policy covers all Staff, students, volunteers, interns, contractors and agency workers. This policy does not form part of any Staff Member's contract and the Company may amend it at any time.

## **Identifying and Managing Drug and/or Alcohol related problems**

7. If you notice a change in a colleague's pattern of behaviour you should encourage them to seek assistance through their Line Manager. If they will not seek help themselves you should draw the matter to the attention of your Line Manager. You should not attempt to cover up for a colleague whose work or behaviour is suffering as a result of an alcohol or drug-related problem.
8. If you believe that you have an alcohol or drug-related problem you should seek specialist advice and support as soon as possible.
9. Where a Line Manager considers that deterioration in work performance and/or changes in patterns of behaviour may be due to alcohol or drug misuse they should talk to HR.
10. If your Line Manager has reason to believe that you are suffering the effects of alcohol or drugs misuse, they will invite you to an investigatory interview. The purpose of the interview is to:
  - a. Discuss the reason for the investigation and seek your views on, for example, the deterioration of your work performance and/or behaviour; and
  - b. Where appropriate, support you in seeking medical and/or specialist advice.
  - c. If, as the result of the meeting or investigation, your manager continues to believe that you are suffering the effects of alcohol or drugs misuse and you refuse to seek appropriate treatment the matter may escalate under our Disciplinary and Capability Procedure.
11. Universify Education's aim to ensure that the confidentiality of any Member of Staff experiencing alcohol or drug-related problems is maintained appropriately. However, it needs to be recognised that, in supporting Staff, some degree of information sharing is likely to be necessary.

### **Staff Consumption and Possession of Alcohol**

12. Staff Members, being over the age of 18 are all legally allowed to possess and consume alcohol. No Staff Member should be incapacitated at work due to alcohol. This would constitute gross misconduct under the Disciplinary and Capability Policy.
13. Staff of students aged under 18 must not consume

alcohol whilst on duty. It may be appropriate for pastoral staff of over 18 year old students to consume a small amount of alcohol at a scheduled event of activity, such as graduation receptions and formal dinners. This is limited to two glasses of wine and there will always be a designated member of staff who will not consume any alcohol.

14. Residential staff are free to consume alcohol if they are not working and not due to return to work that same working day or night. Incapacity due to alcohol should be avoided by residential Staff at all times – even outside of normal working hours.

16.. Consumption of alcohol by non-residential Staff outside of their working hours should be limited to avoid being in an unfit state to work.

17. Staff working should not under any circumstances socially engage with students outside of the working day and outside of the College Site unless there is a clear reason for doing so, permission has been sought by the Course Director and other staff are present.

18. Staff must not, under any circumstances, supply any student at Universify Education with alcohol outside of un-timetabled activities and never for under-18 year-olds.

19. Universify Education expects all Staff to demonstrate responsible behaviour at work, work-related functions and work-related social events and to act in a way that will not have a detrimental effect on the Company's reputation.

20. Universify Education expects all Permanent Staff to demonstrate responsible behaviour at work, work-related functions and work-related social events and to act in a way that will not have a detrimental effect on the Company's reputation. If you represent us at external events where alcohol is served, you are considered to be "at work" regardless of whether you do so outside normal working hours. Consequently, we will expect you to remain professional and fit for work at all times.

## **Searches**

21. We reserve the right to conduct searches for drugs or alcohol (in accordance with the conducting a search policy) on College site premises, including, but not limited to, searches of lockers, filing cabinets and desks, bags, clothing and packages.

22. Any drugs or alcohol found as a result of a search will be confiscated and action may be taken under the relevant disciplinary procedure.

### **Student Consumption and Possession of Alcohol**

23. Students over the age of 18 must not consume alcohol on the College site unless it is in the Bar areas. Alcohol must not be consumed in students' rooms on the College Site;

24. Students must not consume, solicit or otherwise acquire alcohol. Any student under the age of 18 found in possession or under the influence of alcohol will be considered to be in breach of the Student Disciplinary Policy.

25. Any student who turns 18 whilst on the course will be considered to be under the age of 18 for the purposes of this policy throughout their time at Universify Education.

Updated: January 2020

# Smoking Policy

1. Universify Education is committed to protecting the health, safety and welfare of all staff and students by providing a safe place of work protecting all students, workers, service users, customers and visitors from exposure to smoke. All of our workplaces are smoke-free in accordance with the Health Act 2006 and associated regulations. All Staff, students and visitors have the right to a smoke-free environment. This policy does not form part of any Staff Member's contract and it may be amended at any time.

## **Where is Smoking Banned?**

2. Smoking is not permitted at any time anywhere in the workplace, on the college site or (for course-delivery staff) in the presence or sight of students. The ban applies to anything that can be smoked and includes, but is not limited to, cigarettes, electronic cigarettes, pipes (including water pipes such as shisha and hookah pipes), cigars and herbal cigarettes.

## **Where is Smoking Permitted?**

3. On-course staff over 18 years of age may only smoke outside, outside of College grounds and not in the presence of students during breaks. When smoking outside, staff must dispose of cigarette butts and other litter appropriately. Students under 18 years of age must not smoke at any point while at Universify Education.

## **Breaches of this Policy**

4. Breaches of this policy by any Staff Member will be dealt with under our Disciplinary and Capability Procedure and, in serious cases, may be treated as gross misconduct leading to summary dismissal. Breaches of this policy by students will be dealt with under our Student Discipline Policy, Course Rules and Terms and Conditions. Smoking in smoke-free premises or vehicles is also a criminal offence and may result in a fixed penalty fine and/or prosecution.

Updated: January 2020

# Anti-Bullying Policy

1. We believe that all students have the right to live and be educated in an environment which is supportive, caring and safe, and where there is mutual respect, courtesy, kindness and co-operation. Bullying is anti-social behaviour and it will not be tolerated in any form by Universify Education. This policy has been developed with due regard to the duties and obligations under existing legislation and for the safeguarding and well-being of all students.

## Forms of Bullying

2. Bullying is deliberately hurtful behaviour to someone as a single incident or over a period of time. It can be either physical, verbal or indirect or a combination of any of these forms.

3. Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation.

4. Bullying can take the form of physical, verbal and non-verbal conduct. Bullying may include, by way of example:

- a. Physical or psychological threats;
- b. Overbearing and intimidating levels of supervision; or
- c. Inappropriate derogatory remarks about someone's performance.

5. Legitimate, reasonable and constructive criticism of a worker's performance or behaviour, or reasonable instructions given to workers in the course of their employment, will not amount to bullying on their own.

6. Cyber-bullying includes the use of ICT in the following ways:

- a. Texting or emailing unpleasant, frightening, offensive or derogatory mobile phone messages;
- b. 'Sexting', where sexually inappropriate mobile phone pictures and messages of one person are used by another person to upset, harass or demean



- the person in the pictures;
  - c. Posting abusive or demeaning comments on social networking sites such as
  - d. Facebook and Twitter, or in chat rooms; or
  - e. Deleting or ignoring a person's messages on social networking sites or in chat rooms.
- 7. Sexual and sexist bullying includes:
  - a. Making any offensive, derogatory or demeaning comment or innuendo to a person linked to their gender, sexuality or sexual activity;
  - b. Displaying sexual or pornographic pictures on any electronic device with intent to insult, demean or harass another person; or
  - c. Any unwanted physical conduct or coercion into a sexual act.
- 8. Racist and religious bullying includes making any offensive, derogatory or demeaning comment to a person linked to their race, nationality, ethnicity, religion or belief, or cultural practices.
- 9. Homophobic bullying includes making any offensive, derogatory or demeaning comment or innuendo to a person linked to their sexuality (or perceived sexuality) to upset, harass, humiliate or isolate that person.
- 10. Disability bullying includes making any offensive comment or physical interference towards another person who has a mental or physical disability or a learning difficulty, whereby that disability or learning difficulty is exploited with the intent to upset, harass, humiliate or isolate that person.
- 11. Gender-based bullying includes making any offensive comment or physical interference towards another person based on the gender they identify with, whereby their gender identity is exploited with the intent to upset, harass, humiliate or isolate that person.

## **Tackling Bullying**

- 12. Prevention - The following procedures are intended to discourage bullying in all its forms.
  - a. Unauthorised absence from class will be

- reported by the Tutor to the Course Director and will then be followed up by the Group Leader.
- b. Poor academic performance is monitored and addressed by the Course Director.
  - c. Group Leaders will see any member of their group, by appointment, during the day, who wishes to discuss any personal problem with them.
  - d. Group Leaders will be informed of anyone in their group who has reported or is suspected of being bullied or bullying, and asked to monitor the situation.
  - e. Residential Staff will report anyone who is absenting themselves from meals or not eating normally.
  - f. The issue of bullying and anti-social behaviour will be addressed in daily Course Director meetings,
  - g. The pastoral team will maintain constant vigilance around College at all times. Any student whose behaviour is a cause for concern will be discussed at a meeting between the Course Director, and relevant Group Leader.
  - h. Universify Education will discourage the formation of racial or ethnic cliques and insist on the use of English in and out of lessons.
  - i. Students will be advised that Members of Staff do have the ability to stop bullying and are encouraged to speak to them.
  - j. Students will be advised that anyone who feels that they are being bullied, or who knows that someone else is being bullied, should tell any member of the academic, pastoral or residential Staff. The disclosure will be passed on to and dealt with by the Course Director in the first instance.

All complaints of bullying will be taken seriously, investigated, dealt with appropriately, effectively, sensitively and as confidentially as possible, and responded to in a consistent manner.

13. Preventative Measures to stop cyber-bullying:

- a. All students are required to adhere to the Colleges' 'Acceptable Use of IT Policy' for the safe use of the internet. Certain sites are blocked by the College's filtering system and Staff may monitor students'

use. Students' email use may also be monitored by the College.

- b. Guidance is offered on the safe-keeping of names, addresses, passwords, mobile telephone numbers and other personal details.
- c. Mobile telephones are to be used with discretion and not in lessons unless expressly for teaching purposes, as directed by the Tutor.
- d. The use of cameras on mobile telephones is not allowed in seminars (unless with express permission) nor in washing and changing areas.

14. Recording, reporting and monitoring bullying:

- a. Students are encouraged to report incidents of bullying to any member of the academic or on-course Staff of their choice.
- b. Students may also choose to give information anonymously by a note.
- c. All incidents of bullying should be recorded and reported to the relevant Group Leader. The Course Director should be copied into all reports.
- d. Where students have been involved in a bullying incident, they will be observed to ensure that the behaviour is not repeated.

15. Dealing with a report of bullying:

- a. Reports of bullying, where received by a named student should be reported to the relevant Group Leader.
- b. The Staff Member receiving the report should ensure the immediate well-being of the student reporting the incident.
- c. Where reports of bullying are made anonymously then they should be discussed in a confidential meeting of the Group Leader to establish whether the victim can be identified. Where they can procedures should follow as normal. Where the student cannot be identified all Staff should continue to monitor their groups as normal for signs of bullying occurring.
- d. All reports should be dealt with as confidential within the Staff body.

16. Dealing with observations of bullying:

- a. If a Member of Staff observes, or believes they observe bullying then they must intervene immediately to end the instant instance of the behaviour.
- b. Staff should take the names of all involved.
- c. Staff should ensure the immediate well-being of the suspected victims of the incident.
- d. Staff should (where applicable) report the matter to the Group Leader for the group who will oversee the response.
- e. Students who have been bullied will be supported in the following ways:
  - offered an immediate opportunity to discuss what happened, particularly their feelings, with their Group Leader or any Member of Staff of their choice.
  - Being reassured that they have done the right thing by reporting the incident, if applicable, and that Universify Education will be investigating the incident and taking it seriously.
  - Being offered on-going and continuous support, if appropriate.
  - Working together to restore their self-esteem and confidence, if appropriate.
- f. The above forms of intervention will be aimed at supporting and empowering students who have experienced bullying rather than encouraging a view of them as victims.

17. Students who have bullied will be helped in the following ways:

- a. Discussing what happened and discovering why they became involved.
- b. Exploring different perspectives of the incident, as appropriate.
- c. Establishing all hurtful and offensive behaviour and the need to change.

18. Universify Education will impose sanctions on students who have bullied in accordance with its Student Discipline Policy. The type of sanction will depend upon the severity of the incident. Where appropriate, and only with the consent of the victim, Universify Education, in addition to sanctions, will arrange a conciliation meeting with the students involved in the bullying to facilitate their well-being and the cohesion of the group and the course.

Updated: January 2020

# Complaint Management Policy

1. Complaints can come to all levels of Universify Education Staff in many forms and from many people. All Staff should be equipped to respond appropriately to these as they arise. This document outlines the procedures established at Universify Education to manage complaints.

## **The Complainant**

2. Complaints from Tutors regarding other Universify Education Staff are to be treated according to the Grievance Policy and as such should be referred to the Course Director according to those procedures.

3. Complaints from Pastoral Staff regarding other Universify Education Staff are to be treated according to the Grievance Policy and as such should be referred to the Course Director according to those procedures.

4. Complaints from students, Tutors or Pastoral Staff which fall within the ambit of the Student Discipline Policy should be treated in line with that policy.

5. Complaints from students which do not fall within the ambit of the Student Discipline Policy should be treated according to this Complaints Procedure.

6. Complaints from parents should be treated according to this Complaints Procedure.

7. Complaints from College Staff / Fellows should be treated according to this Complaints Procedure.

8. Any complaint which concerns a report of harm (whether psychological/emotional or sexual) of a student under the age of 18 then the procedure in the Safeguarding Policy should be followed.

## **The Recipient of the Complaint**

9. Any Member of Staff can receive a complaint. It is therefore important that these basic rules are followed.

- a. The recipient of the complaint should immediately refer it in its entirety to the Course Director unless the subject of the complaint is a Tutor in which case the reference should be to the Programme Manager.
- b. If both the Course Director and Programme Manager are subject to the complaint, then it should be referred to the Charity Manager.
- c. If the Course Director is subject to a complaint then the Programme Manager should be notified by person receiving the complaint.
- d. The recipient of the complaint should be open and understanding, ensuring that they do not take negativity or anger on the part of the claimant as a personal attack or challenge.
- e. The recipient of the complaint should be helpful and respectful and give the complainant their undivided attention.
- f. The recipient of the complaint should not be defensive in receiving the complaint, nor attempt to apportion blame, but rather should remain positive.
- g. The recipient of the complaint should make an immediate record of the complaint in line with the Documentation section of this policy.
- h. The recipient of the complaint should under no circumstances disclose the existence or receipt of the complaint to the subject(s) of the complaint.
- i. Students will be advised that in the first instance if they have a complaint they should go to their Group Leader, and failing that, to go to another Group Leader or the Course Director.
- j. Parents will have contact details for the Course Director and Head Office and it should be expected that most complaints from parents will be addressed to them. All Staff though should be ready to potentially receive a complaint from a parent.

### **The Form of the Complaint**

10. If a complaint is received via an email then the full email should be forward along with a covering note to an appropriate individual.

11. If a complaint is received via a phone call:

- a. The recipient should offer the complainant the chance to make a written complaint
- b. The recipient must record the conversation which they should then write up into a formal record following the procedures in the Documentation section of this policy and ensure that a phone number is taken for contacting the complainant (regardless of whether they are onsite). This should then be sent immediately to an appropriate person; and
- c. It is important to summarise the issues to clarify and check that the complaint has been understood.

12. If a complaint is received in person:

- a. The recipient should offer the complainant the chance to make a written complaint
- b. The recipient should be sure to take a full note of the conversation which they should then write up into a formal record following the procedures in the Documentation section of this policy and then ensure that this is sent immediately to an appropriate person
- c. It is important to summarise the issues with the complainant to clarify and check that the complaint has been understood.

13. If a complaint is received in writing then the recipient should be sure to make a copy of the written complaint and place it in the designated secure location. The original should then be sent to the person identified at 2.A.i along with a covering note which is written in accordance with the procedures in the Documentation section of this policy.

**Course Complaints Procedure:**

If there is any problem with your course, we want to be the first to hear about it:

If you're experiencing a problem during the course, then please contact your **Course Director**

If you're experiencing a problem before or after the course, then please contact **admissions at** [info@universifyeducation.com](mailto:info@universifyeducation.com).

It is essential that you contact us as soon as possible so that we can try to rectify the situation on the spot. In the unlikely event that the matter remains unresolved after 5 working days, then please **ask** to speak with a manager and we will do our utmost to find a satisfactory solution.



## **Documentation**

14. The record of the complaint, however it is received, should:
- a. Use objective language to clearly state the facts
  - b. Present information (where possible) in chronological order
  - c. Uses quotations marks wherever necessary to make clear what is reported speech and to whom it is attributed and whether or not the reportage is verbatim;
  - d. Be typed, or neatly and legibly written in pen or biro
  - e. Use clear and unambiguous language throughout
  - f. Include, where necessary, dated and initialled corrections
  - g. Include the name of the author of the record of the complaint, their role in the Company, the date and time it was received and the date and time it was written up
  - h. Be signed by the author.

## **Complaints Management Procedure**

### **Stage One**

15. The Complaint should be received in accordance with the procedures outlined above. All complaints which fall under this Complaints procedure should be forwarded to the appropriate person.

16. If the recipient of the complaint feels that it can be resolved by them then they should, when reporting the matter, suggest the course of action they think appropriate – this may be authorised by the individual to which they are reporting the complaint.

17. If the complainant wishes to submit their own notes of a verbal conversation then they may do so and the recipient of the complaint should advise them to whom it should be sent and by when. This will normally be within 24hrs and to an appropriate person. This may be submitted with the help of a third party if they choose to do so. In the event that the Course Director is the recipient of the complaint they should nevertheless complete the same formal report and written notes.

### **Stage Two**

18. Once the Course Director (or appropriate person) has received the formal report of the complaint from the recipient of the complaint they must decide whether to:

- a. Take no further action.
- b. In the event that the appropriate person chooses not to investigate the complaint they must give reasons for this decision. (This decision may be challenged by a review.)
- c. Refer the complaint to an external agency if required.
- d. Initiate an investigation of the Complaint, within Universify Education, if further information is required.

This decision should be taken within 24 hours of receipt of the report

### Stage Three

19. Once an investigation has been initiated the appropriate individual must investigate the complaint immediately:

- a. The complaint should be investigated swiftly and without undue delay.
- b. The investigation should be collaborative, with an aim of establishing the facts of the matter regarding which a complaint has been made.
- c. Due attention should be paid to all company policies in the conducting of the investigation.
- d. The investigation should be documented to a level sufficient for a clear review of its method and findings.

20. Following the investigation, and within one day of completion, the investigator will:

- a. Where necessary, convene a meeting with the complainant in order to discuss the outcome of the investigation and any action to be taken;
- b. Send a full written response to the complaint to the complainant detailing the outcome of the investigation and any action to be taken; and
- c. Inform the complainant of their right to a review if they are unsatisfied with the action taken.

- d. The sorts of actions which may be appropriate in response to a complaint are action against a student in line with the Student Discipline Policy/Course rules; action against a member of Universify Education Staff in accordance with the Staff Disciplinary and Capability Policy; and review of Universify Education's policies and procedures.

#### Stage Four

21. The fourth stage is the review stage, is reached either at the conclusion of Stage Three or at the decision to take no action at Stage One. If the complainant feels that their complaint has not been satisfactorily resolved they may ask for the response to be reviewed. The review should be conducted by the Charity Directors.

22. The review should examine all areas of the handling of the complaint from the first instance of the complaint being made to a Member of Staff through the response by the individual investigating, any investigation and any response subsequent to investigation.

23. The review should be conducted as soon as possible, preferably within two working days of the review being requested. The review should involve, but not be limited to talking with those involved in the response to, and the investigation of the complaint; and reviewing all documentation from the complaint and subsequent response and investigation.

24. The Charity Directors or their appointed representative should meet with the complainant to present the findings of the review. The complainant has a right to be accompanied at any such meetings by another Member of Staff or union representative not acting in a legal capacity.

25. Where the review finds a failing, procedural or substantive, in the conduct of the complaint procedure by any individual involved in the response (excluding the complainant), the Charity Directors will be empowered to, at their discretion do one or more of the following:

- a. Change or alter the decision made in response to the complaint at first instance.
- b. Order the complaint to be reconsidered by the next most senior member of Universify Education not involved in the review or the initial response

- and/or investigation.
- c. Initiate disciplinary proceedings against some or all of those involved in the response to the complaint – these shall be conducted under the Staff Disciplinary and Capability Policy and may be treated as gross misconduct.

26. There is to be no further internal review or appeal of the decision or findings of the review.

Updated: January 2020

# Conducting a Search Policy

1. Universify Education is committed to safeguarding and promoting the welfare of both staff and students. Accordingly, there may be occasions when it becomes necessary to search the person, the belongings or the room of a student. These instructions set out the circumstances in which such searches can be carried out and the means by which it should be done, in accordance with the Education and Inspections Act 2006 and DFE Guidance for Schools on Screening, Searching and Confiscation (14 February 2014, updated 23 September 2016).
2. Head Office or the Course Director of the student concerned may authorize or carry out a search. In all circumstances the consent of the students to any search should be requested. A second adult witness must always be present. Incident reports must be submitted about any such search, listing all the main details. Affected students' parents should always be contacted after any search, regardless of the outcome.
3. At Universify Education, given students' good conduct and taking into account the very good relationships between students and staff, it is unlikely that searching students will be necessary, but there are some occasions when it may be; at those times, this policy should be followed.
4. There are two types of search: those with consent and those without consent.

## Searching with Consent

5. Universify Education staff can search students with their consent for any item which is banned by the course rules. Universify Education is not required to have formal written consent from the pupil for this sort of search – it is enough for the staff member to ask the student for them to turn out their pockets or if the staff member can look in their locker or bag.
6. If the student refuses to comply, this is not necessarily an admission of guilt; however, the matter should be referred to a senior member of staff if appropriate.

## Searching without consent

7. Items that can be searched for under these powers

include knives, weapons, alcohol (minors), illegal drugs and stolen items (referred to as prohibited items). The search should always be carried out in the presence of another staff member, if possible.

8. The search may be carried out if you have reasonable grounds of suspecting that a student is in possession of a prohibited item.

### **Carrying prohibited items**

10. If a student is suspected of carrying a prohibited item they should be asked, in the presence of a second adult witness, to turn out their pockets. Staff should not touch the student but can ask them to remove any outer clothing to check for prohibited items (outer clothing refers to any item which is not immediately touching the skin).

11. If possession is not confirmed but is still suspected, police involvement may be required.

12. Parents or guardians only need to be informed of the search if prohibited items have been discovered.

### **Searches of a Pupil's Personal Property**

13. There may be circumstances in which staff wish to search a student's personal property, such as a bag, mobile phone or locked box. Under common law powers, any item may be searched if a student gives consent. If a student does not consent to a search, it is only possible to search for the prohibited items listed above.

14. The search must be witnessed by a second adult and, ideally, the student. The fact that a search has taken place must be recorded (i.e. a record of the incident is emailed to the Course Director or Programme Manager).

15. Parents or guardians only need to be informed of the search if prohibited items have been discovered.

### **Searches of college property**

16. Those authorised to carry out searches may search college property, such as a student's desk, if they believe illegal drugs or

weapons or stolen property to be stored there. Prior consent can be sought, but individuals should be made aware that Universify Education may still proceed with a search even if consent is refused. The decision to go ahead in such circumstances must take into account the likelihood of an offence having been committed. A second adult witness should always be present and, if possible, the student concerned.

17. For less serious items, the same rules apply as above, but the extent and nature of the search should be proportionate to the value of the item sought and the likelihood of the item being found. Great care must be taken to avoid persistent targeting of individuals where allegations of victimisation or discrimination might arise.

18. Forcible entry into locked college property is only justified in extreme circumstances and requires the sanction of the Course Director and the college staff.

19. Parents/guardians should be informed of the search if prohibited items have been found.

### **Off-site trips**

20. This policy applies both in and outside of college sites, and may be a requirement during an off-site trip. The adult in charge of the trip should attempt to contact the Course Director. If this isn't possible and a search is necessary, the adult in charge is empowered to carry it out, following all the above procedures. A second adult should act as a witness. A record must be kept and an incident report submitted in due course.

Updated: January 2020

# Medical and First Aid Policy

1. Universify Education implements appropriate policies for the care of students who are unwell. These include first aid, care of those with chronic conditions and disabilities, dealing with medical emergencies and the use of household remedies.
2. **Accommodation** for students who are unwell will be adequately staffed, adequately separated from other students and in separate accommodation for male and female students where this is necessary. In addition to any provision on site, students have access to local medical, dental, optometric and other specialist services or provision as necessary. Details of who to contact are provided to course staff.
3. Prescribed medicines are given only to the student to whom they are prescribed. Students allowed to self-medicate are assessed as sufficiently responsible to do so.
4. The confidentiality and rights of students as patients are appropriately respected. This includes the right of a boarder deemed to be “Gillick Competent” to give or withhold consent for their own treatment. (Gillick competence is used in medical law to decide whether a child (16 years or younger) is able to consent to their own medical treatment, without the need for parental permission or knowledge. A child will be Gillick competent if they have sufficient understanding and intelligence to understand fully what is proposed).
5. Prior to admission students and parents are asked to complete a questionnaire about the student’s past medical history. In submitting the medical and arrivals form parents and guardians give consent for investigations and treatment to be carried out at the local doctor's discretion or by a medical practitioner.
6. If a student needs to see a doctor, dentist or optician the Group Leader will ensure that an appointment for the student is made. If a student needs to see a Doctor at another time an appointment can be made at the local surgery and the student will be accompanied by their Group Leader, or appropriate deputy.
7. Records are kept of any medication or treatment administered to a pupil whilst under the care of Universify



Education. Records are kept of all major accidents in the incident log. Major and minor accidents and illnesses are recorded.

8. First Aid arrangements are in operation to ensure that all pupils, members of staff and visitors will receive immediate First Aid in the event of an accident, no matter how minor or major. Universify Education has qualified first aiders. The company ensures that initial/repeat training is given as required:

- a. Basic First Aid Kits are provided to every Group Leader. Used items must be replaced as soon as possible, and the contents checked on handover to the next holder.
- b. The Course Directors are responsible for checking and updating the contents of the site first aid boxes, where held.
- c. Controlled drugs are kept secure by the appropriate member of staff.

9. Chronic Conditions and Disabilities.

- a. Appropriate staff members will be made aware of students' particular health problems. Universify Education provides guidance in how to deal with these.
- b. Prior to starting a course at Universify Education parents/guardians of students under 18 must complete and submit a form detailing any particular health problems which their child may have. For students over 18 they may complete and submit the form themselves.
- c. All on-course staff will receive guidance on common chronic conditions.

10. Management of medication, including household remedies.

- a. The appropriate member of staff will administer over-the-counter medications and prescribed medications to the named individual.
- b. Should a pupil refuse to take medication staff should not force them to do so and it may be necessary to inform their parents.
- c. Students who need inhalers must bring their own and staff must know where students keep their spare inhaler. Staff should be prepared to hold an additional spare inhaler (provided by the student) if a student wishes.

11. Storage of medicines by staff.

- a. It is the responsibility of the Course Director to ensure that all medications are stored appropriately.
- b. A list of all medications stored should be kept. It is the responsibility of the Course Directors to carry out checks at the start of each course. A copy of this checklist should be kept by the Course Director in the Course Director's office.

12. Off-site trips.

- a. A first aid box should always be taken on off-site trips.
- b. Children who have asthma should take their inhalers with them.
- c. In the case of a child with a severe allergy condition their medication, including adrenaline in case of emergency should be with them at all times. A member of staff accompanying the child should know how to administer the adrenaline if required.
- d. Diabetic children should take a blood glucose monitor, insulin and form of fast acting sugar with them.

13. Hygiene.

- a. Protective disposable gloves are available in the first aid kits. These should be used when staff are dealing with spillages of blood or other bodily fluids. It is essential that spillages of bodily fluids are dealt with quickly and safely, ensuring that measures are taken to prevent others from being exposed to the potentially harmful fluids and to minimise the spread of the infection.
- b. Anything which has been used to clean up blood or a wound should be placed in a plastic bag and disposed of in the appropriate bin.

14. Confidentiality.

- a. Pupils should be aware that they can discuss any matter with the Course Director or GP in complete confidence.

- b. Any breach of that confidence would be discussed with the pupil first and only if it is thought that the health of other pupils at Universify Education was at risk, or that it was in the pupils' own interest to share the information.

15. Emergency Procedure.

- a. Where necessary the emergency services should be called immediately (999) and the Course Director is informed.
- b. A member of staff must accompany a student to hospital.
- c. The Course Director should inform the student's parents and the Programme Manager at the earliest possible opportunity.

Updated: January 2020

# Safeguarding policy

This policy applies to the whole of Universify Education's workforce, including volunteers and trustees. This policy is available for parents online, a paper copy and/ or translation is available on request.

This policy is based on:

- Department for Education guidance;
- 'Keeping Children Safe in Education' January 2021;
- 'Working Together to Safeguard Children' July 2018;
- Dealing with Allegations of Abuse against Teachers and Other Staff and the Education (Independent College Standard) (England) Regulations 2010 (as amended)

## **Universify Education's commitment to Safeguarding**

1. Universify Education recognises its responsibility for safeguarding and promoting the welfare of children. Universify Education seek to establish a safe and nurturing environment for all students and staff. Because of the day-to-day contact with children, Universify Education Staff have a responsibility to be vigilant to the outward signs of abuse, and act if they know or suspect that a child is being abused. Safeguarding is the responsibility of everyone within the company that may come into contact with children on the course. Universify Education will apply this policy equally to any child regardless of age, gender, ethnicity, disability, sexuality, faith or belief.

2. Universify Education will:

- Uphold a culture of ongoing vigilance towards safeguarding
- Treat safeguarding as everyone's responsibility
- Maintain openness around discussing concerns in the belief that 'it could happen here'
- Ensure students know they can approach any adult at Universify Education and they will receive a consistent, supportive response
- Provide clear procedures and support for reporting concerns and setting acceptable standards of behaviour

3. This means that all staff, whether voluntary, seasonal or

permanent, are required to report any safeguarding concerns to a Designated Safeguarding Lead and undertake safeguarding training, as deemed appropriate by Universify Education. We have established and will maintain links with relevant agencies and co-operate as required with enquiries of a child protection nature. We will keep accurate written records of concerns on students even where referral is not appropriate immediately and ensure that all child protection records are kept securely, remain confidential, and separate from the main student file.

4. This also means that Universify Education will undertake to follow the specific Local Authority's Safeguarding Children's Board procedures for all locations in which we deliver our courses. In all cases of abuse, or suspected abuse, we acknowledge the statutory obligations placed on us by Section 157 of the [2002 Education Act](#). We will therefore ensure that this policy and our procedures are consistent with the requirements of:

- a. Working Together to Safeguard Children (2018)
- b. Keeping Children Safe in Education (2021)
- c. Children Act 1989/2004
- d. Education Act 2002 (S157), including:
  1. Safeguarding Vulnerable Groups Act 2006
  2. Independent Colleges Regulations 2010 (as amended)
  3. Department for Education: 'Safe to Learn' 2010

5. We will review our policy and procedures annually with all changes communicated to staff and we will ensure that we have a designated Member of Staff for safeguarding who has received appropriate training and support for this role. We will also maintain a number of Designated Safeguarding Leads, currently listed as:

- Alex Whitton ([alex.whitton@universifyeducation.com](mailto:alex.whitton@universifyeducation.com))
- Bertina Ho ([bertina.ho@universifyeducation.com](mailto:bertina.ho@universifyeducation.com))

6. All staff will have access to requisite training for their role, this includes ensuring that:

- a. The designated Member of Staff receives updated training (child protection and inter-agency work) every 2 years approved by the OSCB or NSPCC and that this training is disseminated to all others in Universify Education at least every 3 years in line

with statutory requirements.

- b. All staff responsible for the decision on hiring staff who will interact with children have undergone safer recruitment training and abide by our safer recruitment policy.
- c. All staff at all levels have access to training and briefing sessions in safeguarding with refresher training every 3 years.
- d. Seasonal Staff and voluntary Staff who work with children are to be trained in Universify Education's safeguarding procedures. This includes ensuring that:
  - (1) All newly appointed Staff and volunteers will have induction training which includes child protection.
  - (2) All staff are aware that any inappropriate relationship between staff and a participant of any age on the course will result in instant dismissal. In cases where the law is broken, the appropriate authorities shall be involved.
  - (3) All Staff and volunteers understand their responsibilities in being alert to, and acting appropriately in, cases of abuse or suspected abuse.
  - (4) All staff are aware of their pastoral responsibilities (as outlined in their contracts and job specifications) and that any other type of relationship between a staff member and course participants, regardless of their age (including students aged over 18 years of age), will be deemed inappropriate and shall lead to instant dismissal. Please refer to **Positions of Trust** (paragraph 10).
  - (5) All staff, trustees and volunteers understand that there is a procedure to be followed in dealing with allegations made against teaching and non-teaching staff and volunteers. This procedure must be followed on all occasions (see Department for Education guidance: Dealing with Allegations of Abuse against Teachers and Other Staff

available from the Child Protection Officer).

## **Safer Recruitment and Delayed Suitability Checks**

7. All our staff, whether seasonal or permanent, will be recruited in accordance with our Safer Recruitment Policy, which includes:
  - a. Enhanced DBS checks or (international) a Certificate of Good Conduct from their local police (translated)
  - b. Before employment begins, two validated reference checks which specifically indicate the candidate's suitability to work with vulnerable adults and children under the age of 18.
  - c. Reporting to the Disclosure and Barring Service any person (whether employed, contracted, volunteer or student) whose services are no longer used because they are considered unsuitable to work with children. This will be done within one month of the individual leaving the Company.
  - d. In cases where a member of residential Staff is suspended pending investigation of a child protection nature we will undertake to resolve the investigation as quickly as reasonably possible to enable the member of staff to return. Universify Education may, at our discretion based on the nature of the investigation, provide alternative accommodation

Delayed Suitability Checks where a DBS or equivalent suitability check has been applied for but not yet received for a member of staff. In these cases, the following measures will be taken:

- e. If residential, the member of staff will be accommodated in a part of the facility that students do not access
- f. Unsupervised access to students will not be allowed until a satisfactory check has been obtained
- g. Teachers will only teach with the door open with a DBS'd member of staff present in the room

## **Prevention and Support**

8. We recognise that high self-esteem, confidence,

supportive friends and good lines of communication with a trusted adult helps to safeguard students. Universify will therefore:

- a. Establish and maintain an ethos where children and young people are encouraged to talk and are listened to.
- b. Ensure children know that there are staff whom they can approach if they are worried or in difficulty.

At Universify Education, we respect the students. The atmosphere is one that encourages all students to do their best. We provide opportunities that enable the students to take and make decisions for themselves. We recognise that abuse and neglect can result in underachievement. We strive to ensure that all our children make optimum educational progress.

### **Student and Staff Ratios**

9. In the interests of student and staff welfare, courses will be staffed to support a ratio of:
  - a. 1 staff member to 8 students

The levels are minimum. Also applicable:

- a. never less than 3 residential staff with a 14-16 age group
- b. one qualified first aider as resident with every student group and on every day trip (1:15)

### **Adult-Child Interaction**

10. **Positions of Trust.** Adults who work with children should avoid any conduct which would lead any reasonable person to question their motivation and intentions. Adults working with under-18s are in a Position of Trust; the Sexual Offences Act (2003) states that any person in a position of trust engaged in a sexual activity **of any sort** with students under the age of 18 is **breaking the law** even though the UK legal age of consent is 16.

11. **Physical Contact.** There are occasions when it is entirely appropriate for staff to have some physical contact with children but this should always be consistent with their professional role and responsibilities. Physical contact should take place only when it is necessary in relation to a particular activity. It should take place in a safe and open environment, i.e. one easily observed by



others, and be for the minimum time necessary. These situations may include:

- a. When a child is in distress – staff should comfort or reassure a child in an age-appropriate way whilst maintaining clear professional boundaries
  - b. For restraint and physical intervention - if staff have failed to diffuse situations any other way, physical intervention may be used to manage a child's or young person's behaviour if it is necessary to prevent personal injury to the child, other children or an adult, to prevent serious damage to property or in what would reasonably be regarded as exceptional circumstances. When physical intervention is used it should be undertaken in such a way that maintains the safety and dignity of all concerned
- First Aid – staff should ensure another member of staff is aware of the action being taken, explain to the student what is happening and record it.

Staff should:

- a. Not use physical force as a means of punishment and discipline. The use of unwarranted force may constitute a criminal offence
- b. Not touch a student in any way that could be considered inappropriate
- c. Not indulge in horse-play
- d. Not block the exit or safe passage of a child that is distressed.

12. **Behaviour Management.** Staff should not use any form of degrading treatment to punish students. Sarcasm and demeaning or insensitive comments are not acceptable. The use of corporal punishment is not acceptable. Any sanctions or rewards should be in line with the Universify's policy as outlined in the training and the Volunteer Handbook.

13. **Fairness.** Staff should exercise care when selecting students for specific activities or privileges to avoid perceptions of favouritism or unfairness. Methods and criteria for selection should always be transparent and subject to scrutiny.

14. **Use of appropriate language.** Staff should:

- a. Not shout at students (except in situations of danger)
- b. Not swear in the vicinity of or at students
- c. Not ridicule or bully students
- d. Not make suggestive remarks or gestures towards

students (or towards colleagues while students are present)

15. **Infatuations and Sexual Contact.** Occasionally, a student may develop an infatuation with an adult who works with them. Staff should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is above reproach.

- a. An adult, who becomes aware that a child or young person is developing an infatuation, should discuss this at the earliest opportunity with the Course Director so appropriate action can be taken to avoid any hurt, distress or embarrassment. There is further guidance in the On-Course Playbook, which is provided to all volunteers.
- b. All staff should clearly understand the need to maintain appropriate boundaries in their contacts with children. Intimate or sexual relationships between students and staff will be regarded as a grave breach of trust. Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is also unacceptable.
- c. Any sexual activity may be regarded as a criminal offence and **will always** be a matter for disciplinary action. Children are protected by specific legal provisions regardless of whether they consent or not. The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts. It may also include non-contact activities, such as causing children to engage in or watch sexual activity.
- d. Staff should:
  - a. Not have any form of communication with a child which could be interpreted as sexually suggestive or provocative i.e. verbal comments, letters, notes, electronic mail, phone calls, texts, physical contact
  - b. Not make sexual remarks to, or about, a child
  - c. Not discuss their own sexual relationships with or in the presence of children

16. **Appropriate appearance.** Staff should dress in ways that are appropriate to their role and in line with the Universify dress code. Clothing should not be revealing, sexually provocative or give rise to misunderstanding or political/cultural offence.

17. **Alcohol, drugs & smoking.** Staff must abide by the alcohol, drugs and smoking policies provided to them in the Volunteer handbook and in their training materials.

- a. Staff must not have consumed alcohol prior to supervising students or return to houses/colleges under the influence of alcohol which causes their behaviour to be disruptive or makes them a risk to students.
- b. All Universify Education sites are non-smoking environments. Staff are not permitted to smoke anywhere on any campuses including boarding houses. Students must be informed of the smoking ban and that disciplinary action will be enforced if the ban is ignored.
- c. Smoking inside a building is a serious matter due to the fire risk and tainting of interior decoration, so this would prompt a final warning as per the disciplinary procedures. Minor infringements can probably be covered by a verbal warning, though repeat offenders will need to be dealt with sternly.
- d. We need to recognise that in some countries smoking is less of a taboo than in the UK and parents may permit even quite young students to smoke. Nevertheless, we have to adhere strictly to our non-smoking policy for both staff and students as per our agreement with schools/colleges.
- e. Proven drug taking/buying will result in the staff member being removed immediately from their position. Students proved to have bought/taken drugs will be immediately removed from the course and sent home at the earliest opportunity.

18. **Communication with students.** Communication between students and staff, by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones, text messaging, e-mails, digital cameras, videos, web-cams, websites and blogs. Staff should not share any personal information with a student. They should not request, or respond to, any personal information from the student (during and after the programme) and should ensure that all communications are transparent and open to scrutiny. Therefore staff should:

- a. only make contact with students for professional reasons
- b. recognise that messaging is rarely an appropriate

response to a child in a crisis situation or at risk of harm. It should only be used as a last resort when other forms of communication are not possible – direct calling should be the first resort when a student is in a crisis situation or at risk of harm

- c. not use internet or web-based communication channels to send personal messages to a child – always have at least a second staff member included in all communications

19. **Accommodation.** All staff should note that among the higher-risk times in accommodation settings are the following:

- a. early morning when students are getting up
- b. at bedtime/lights out
- c. during showering, particularly if accommodation is mixed sex
- d. when students are getting changed for sports activities

In order to minimise risks, staff must adhere to the following, except where doing so may prejudice student safety:

- a. During higher-risk times members of staff must keep to same sex accommodation areas or common areas on the ground floor
- b. No member of staff can go to accommodation areas of the opposite sex after timetabled bedtime, without being accompanied by a same sex staff member
- c. No member of staff may enter a student's bedroom unless the door is kept wide open or unless accompanied by another member of staff
- d. A member of staff must never enter a changing room of the opposite sex
- e. Male/female showers are clearly signposted and must be respected. A member of staff should not go into a showering facility of the opposite sex.

## Reporting a Concern

20. Students are with Universify Education for usually one week. This limits time for abuse to occur, to be noticed, or to be expressed. We recognise that students who are abused may find it difficult to disclose this to Staff who they have only known for a short while. Therefore, we will do all we can to foster a culture of openness and trust, as well as equipping Staff with the knowledge needed to recognise abuse should it occur.

21. It is also possible that students, may feel that their time away

from home is their opportunity to disclose abuse in their lives. In both instances a concern for the student may arise and it is the responsibility of any staff member concerned about a student to voice their concern.

22. It is a requirement of the Children Act (1989) and the National Minimum Standards for Boarding Schools that adults looking after children (those under the age of 18) should be aware of the risks of abuse (by adults or other young people), and take steps to reduce those risks. They should know what to do if they suspect that someone is being physically, sexually, emotionally abused or neglected, or if someone tells them that this is happening. This includes physical and sexual abuse that is occurring on site, or to a student of Universify Education at home or offsite.

## **Whistleblowing**

23. All Staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of their colleagues. We recognise that students cannot be expected to raise concerns in an environment where staff fail to do so.

24. It is noted that the provisions of Section 175 of the Education Act, place a general duty on host university colleges to safeguard and promote the welfare of children in their care and, as such, Staff will adhere to other related College policies, i.e. Behaviour Policy, Anti-bullying Policy, Health and Safety etc.

25. As part of their induction training all new Members of Staff at Universify Education are given an explanation of this policy as part of their induction training and the steps that Universify Education will take when concerns are raised by a staff member or a student.

## **Equal Opportunities and Safeguarding**

26. Some students may be vulnerable to an increased risk of abuse. It is important to understand that this increase is always due to societal attitudes and child protection procedures that fail to acknowledge students' diverse circumstances, rather than the individual student's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues, learning disabilities and reluctance on the part of some adults to accept that abuse can occur.

27. To ensure that all of students receive equal protection, we will give special consideration to students who are:

- disabled or have special educational needs
- living in a domestic abuse situation
- vulnerable to being bullied, or engaging in bullying
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality
- do not have English as a first language

## **Recognising Abuse**

28. There are four categories of abuse to recognise in safeguarding:

- a. Physical abuse - any abuse that causes physical harm.
- b. Emotional Abuse - any abuse causing negative effects on emotional development.
- c. Sexual Abuse - forcing a child to engage in sexual activities, behave in sexually inappropriate ways or by exposing them to sexual activities.
- d. Neglect - persistent failure to meet a child's basic physical and/or psychological needs. This failure can then impair their development and/or physical and mental health.
- e. For full details of the categories of abuse and what to look out for see Part 1 of [Keeping Children Safe in Education](#).

We must also be aware that abuse can be both active and passive, that is to say someone can actively harm a child or they can fail to act to prevent harm to a child.

29. Other forms of abuse include Female Genital Mutilation, trafficking and modern slavery, Peer on peer abuse, Child Sexual Exploitation, Drug Exploitation, forced marriage, Radicalisation and Extremism, Bullying/ Cyberbullying, fabricated or induced illness.

## **Prevent Policy – Radicalisation and Extremism**

30. Under the Counter Terrorism & Securities Act 2015 Universify Education has a responsibility to have due regard to the

need to prevent people from being radicalised or drawn into terrorism. This initiative is known as PREVENT and it is designed to try and reduce the likelihood of people supporting terrorism or becoming terrorists. It also aims to reduce the risk of radicalisation happening within institutions. 'Prevent' refers to all ages not just students under 18.

31. PREVENT Terminology and Responsibility.

- a. Radicalisation: the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind
- b. Extremism: holding extreme political or religious views which may deny rights to any group or individual. Can be expressed in vocal or active opposition to core British values. Extremism can refer to a range of views, e.g. racism, homophobia, right-wing ideology, any religious extremism.
- c. Core British Values:
  - a. Democracy
  - b. The rule of law
  - c. Individual liberty
  - d. Mutual respect and tolerance of different faiths or beliefs (compliant with the Equality Act 2010)
- d. Universify Education meets this responsibility by educating staff in the terminology and the risks. Guidance on how to deal with issues and arising situations is provided in the On-Course Playbook. If any member of staff is concerned that a student is showing signs of becoming radicalised and involved in an organisation which could ultimately harm the student then this needs to be reported centre to the Designated Safeguarding Officer.

## Handling a Disclosure

### Suspecting a student may be at risk of harm

32. There will be occasions when you suspect that a student may be at risk, but you have no quantifiable evidence. In these circumstances, you should try to give the student the opportunity to talk or communicate in their preferred method. The signs you have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill. It is fine to ask the student if they are 'okay' or if you can help in any way.

### If a student discloses to you

33. If a student communicates to you any risks around their

safety or wellbeing you must let them know that you must pass the information on. The point at which you do this is a matter for professional judgement. Never promise confidentiality as we must act with the student's best interests in mind. During your conversation:

- Allow them to speak freely
- Ask open, non-leading questions
- Remain calm with composed reactions
- Give reassuring nods or words of comfort
- Do not be afraid of silences
- Under no circumstances ask investigative questions
- At an appropriate time tell the child/young person that in order to help them you must pass the information on
- Do not automatically offer any physical touch as comfort

34. If the child is in immediate harm you must notify the Designated Safeguarding Lead immediately and failing that contact the local authority. Irrespective of immediate harm, always report the conversation to the Designated Safeguarding Lead. Write up the situation and series of events as soon as possible and seek support if you feel distressed.

35. Staff must notify the Designated Safeguarding lead using the contact information outlined at the end of this policy. They must also complete an incident report form to document any concerns or disclosures as soon as possible.

36. Following a referral to the Designated Safeguarding lead they will complete a risk assessment of the situation to determine the next steps. The Designated Safeguarding Lead and safeguarding team will then work with the appropriate individuals and organisations, including Universify staff, local authorities, schools, social services and the police to determine the best course of action to safeguard a child and will always seek to act in the best interests of the child. See Reporting safeguarding concerns diagram for more details.

## **Supporting staff**

37. We recognise that Staff who have become involved with a student who has suffered, or is suffering, harm, may find the situation stressful and upsetting. We will support Staff by



providing an opportunity to talk through their anxieties with an HR lead, and/or the Designated Safeguarding Lead and we will seek further support whenever needed.

## **Information sharing**

38. We recognise that information sharing is crucial to effective safeguarding. We will share the appropriate information with necessary organisations to safeguard students.

39. We will pass any safeguarding concerns arising during the programme on to a student's school. We will seek confirmation from schools that they have received this information. Where a concern is ongoing we may also contact the local authority. Where there is the possibility that a child could be at risk of abuse or neglect, Universify Education is required to refer the child to their school, Social Work or the Police, and under these circumstances, the parent/guardian would not normally be contacted first.

40. In the case of a serious incident we will inform schools and the student's parents/ guardians, at the earliest possible moment unless doing so would pose a risk to a student. This time will generally be after any local authorities, such as the police, local authority or social services have been consulted.

41. Safeguarding information will be kept securely and separate to a student or staff member's personnel file.

## **Online safety**

42. We recognise that the internet and online technologies can pose specific risks to children that come in three main forms

- Content – being exposed to illegal or harmful material
- Contact – exposure to harmful online interaction, including adverts and adults posing as children
- Conduct –online behaviour that increases the likelihood of harm e.g. bullying or sending explicit images

43. All staff receive appropriate training to highlight the risks posed by working online as well as our responsibility to safeguard children online. The staff code of conduct in the Volunteer Handbook outlines expectations of staff working with children online. Failure to follow this code of conduct may result in disciplinary action.

44. Our course rules and welcome talk identify the risks our

students face online and outline our online behaviour expectations for all students. Failure to follow this code of conduct may result in disciplinary sanctions.

45. All online sessions are recorded for the purposes of monitoring.

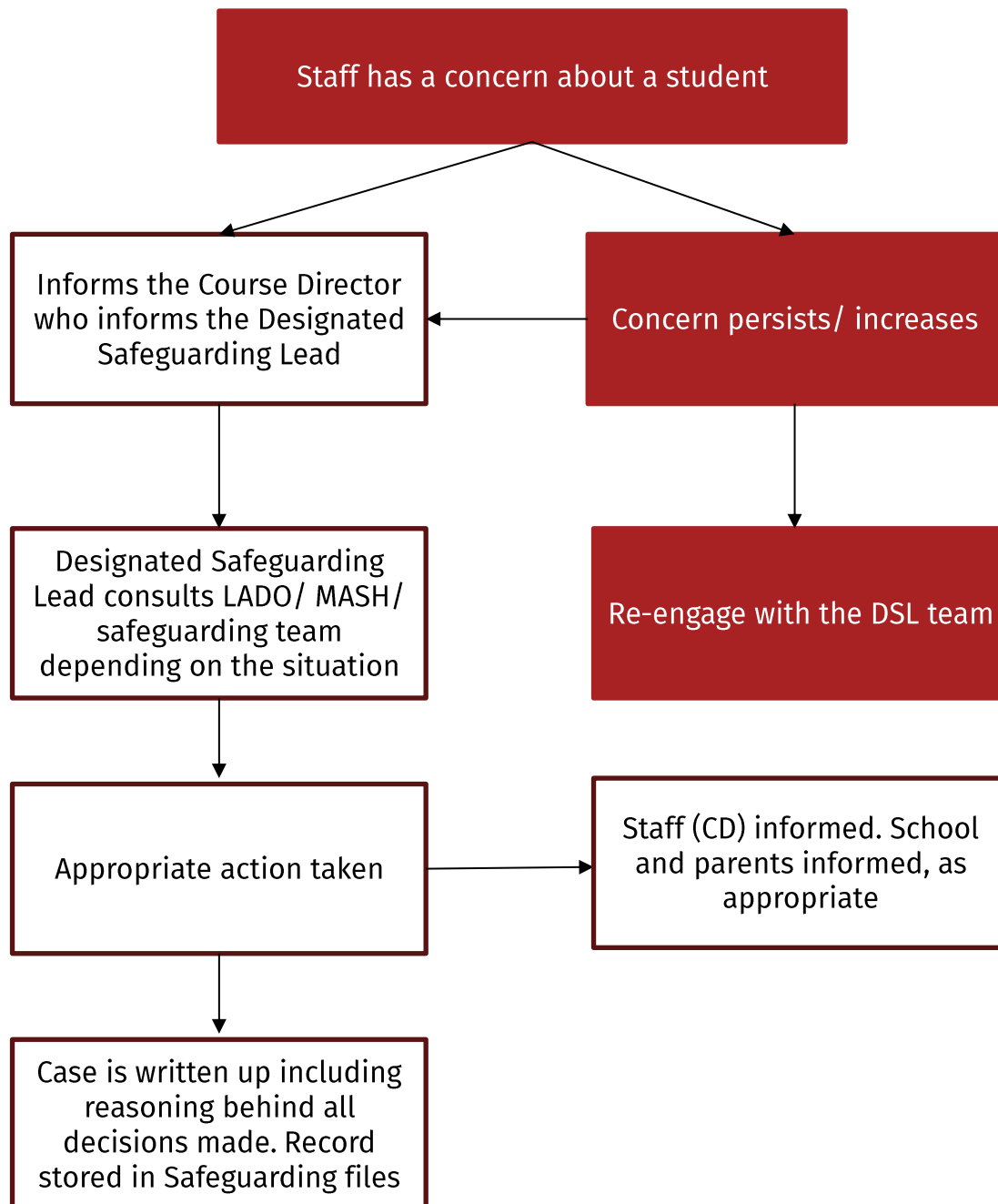
- Online classes are recorded via Zoom
- Coaching sessions are recorded via Bramble.io
- Two Universify volunteers trained in online safeguarding will be present in all online classes
- Where Zoom breakout rooms are used a staff member will go between breakout rooms to carry out spot checks
- Universify's safeguarding team will carry out spot checks of all recordings, including key word searches for all coaching transcripts

46. Risk assessments and appropriate measures are carried out to mitigate risks arising from delivering our programme online. This includes operating waiting rooms, password protecting classes, and limiting access to sessions.

Updated: July 2021

Review: July 2022 (or sooner if required)

### Raising a safeguarding concern



# Allegation Management Policy

1. Universify Education takes all allegations seriously and has a duty of care to any employee or student against whom an allegation has been made, as well as the individual making the allegation. This policy seeks to outline a fair and consistent process by which an allegation may be dealt with quickly, thoroughly and objectively.
2. A safeguarding allegation is any information indicating that a member of staff/volunteer/student may have:
  - a. Behaved in a way that has or may have harmed a child/vulnerable adult.
  - b. Possibly committed a criminal offence against or in relation to a child/vulnerable adult.
  - c. Behaved towards a child or children (or vulnerable adults) in such a way that indicates they would pose a risk of harm if they worked regularly or closely in the future with a child/vulnerable adult.
  - d. Behaves in a way or behaved in a way that indicates they may not be suitable to work with children

## **Making an allegation**

3. Anyone including a staff member, student, or member of the public can make an allegation against a member or student of Universify Education. In all cases Universify Education will:
  - a. Take the matter seriously and keep an open mind.
  - b. Not promise confidentiality to the informant.
  - c. Make a written record of the allegation using the informant's words (including time, date and place where the alleged incident took place, what was said and anyone else present; signed and dated).

## **Handling an allegation**

4. If an allegation is made against a staff member it should be passed onto the Designated Safeguarding Lead. Where the allegation is against the Designated Safeguarding lead it must be passed onto another Designated Safeguarding Lead. The allegation will then be handled by the Designated Safeguarding Lead in accordance with the rest of this policy and using professional judgement.

## **Investigation**

5. When handling an allegation the Designated Safeguarding

Lead will consider if the allegation is about a former member of staff or volunteer, and will contact the police if the child has been harmed (or there may have been intent), needs support, or a crime has been committed. The police and/or child social services should determine next actions.

6. If the allegation is about a current member of staff the Designated Safeguarding Lead will contact the Local Authority's Designated Safeguarding Officer to consider the nature, content and context of the allegation and agree on the following:

- a. What further information is required.
- b. What immediate action needs to be taken to protect the student.
- c. When and what should the parents be told.
- d. Whether suspension of the staff member is necessary.
- e. Whether the case needs to be referred to the police, social care or if an internal meeting needs to be held to determine next steps.
- f. Whether there are no further actions.

After consulting the Local Authority Designated Officer the accused should be notified of the allegation, with the amount of detail agreed with the Local Authority Designated Officer. They should be informed of the likely course of action.

7. A named person must be appointed within Universify Education to support the accused during any investigation. If further investigation is required the Designated Safeguarding Lead will convene a meeting with the Universify Education Safeguarding team to conduct an investigation and agree next steps. When conducting an investigation the Designated Lead must:

- a. Maintain confidentiality throughout the process.
- b. Provide the accused with a full opportunity to answer the allegations.
- c. Complete the investigation within a month and,
  - (1) If unsubstantiated or malicious within a week;
  - (2) If there is no disciplinary hearing 3 days;
  - (3) If there is a disciplinary hearing within 15 days.

## **Suspension**

8. Suspension should happen where behaviour has been intolerable or there has been a disciplinary breach of sufficient weight. This will always be very carefully considered. The individual will inform the person to be suspended as soon as possible in writing and no later than 1 working day of the

decision being made. In all cases, Universify Education will:

- a. Record the decision to suspend, the alternatives considered and why they were not used.
- b. Pair the suspended staff member with a colleague to act as their point of contact throughout the investigation.
- c. Provide support for the staff member if they are returning back to work.
- d. Inform the police if the investigation reveals a crime may have been committed.

## **Decision**

9. To conclude the investigation the Designated Safeguarding Lead must determine the nature of the allegation as either:

- a. Substantiated - sufficient evidence to prove the allegation.
- b. Malicious - deliberate act to deceive and sufficient evidence to disprove the allegation.
- c. False – sufficient evidence to disprove the allegation
- d. Unsubstantiated - insufficient evidence to prove or disprove the allegation

## **Dismissal or resignation**

10. If the alleged individual resigns or leaves, the allegation must still be followed up and the Disclosure and Barring Service notified if appropriate. Likewise, in the case of dismissal the safeguarding team must decide whether the DBS should be informed.

## **Record keeping**

11. The allegation, how it was followed up and resolved, and any actions taken must be recorded and shown to the individual against whom the allegation was made. If the allegation is a malicious one it should be removed from any records kept on the individual.

12. At the conclusion of all cases the Designated Safeguarding Leads must review the case and whether any improvements can be made to procedures and practices to

prevent a similar occurrence and improve processes.

13. Records of all allegations and investigations are to be kept for 10 years.

## **Contact sheet**

### **Universify Education Designated Safeguarding Leads**

Alex Whitton (alex.whitton@universifyeducation.com)

Bertina Ho ([bertina.ho@universifyeducation.com](mailto:bertina.ho@universifyeducation.com))

### **NSPCC**

NSPCC helpline - 0808 800 5000 (24 hours)

[help@nspcc.org.uk](mailto:help@nspcc.org.uk)

<https://www.nspcc.org.uk/>

Childline (for those under 18) - 0800 1111

### **Online safety**

Professionals Online Safety Helpline - 0344 381 4772

[helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk)

## Oxfordshire Local Authority and safeguarding service

LADO Alison Beasley	<a href="mailto:Alison.beasley@oxfordshire.gov.uk">Alison.beasley@oxfordshire.gov.uk</a>	01865 815956	07833436649
Safeguarding Co-Ordinators	Contact if the LADO is unreachable		
Donna Crozier	<a href="mailto:Donna.cozier@oxfordshire.gov.uk">Donna.cozier@oxfordshire.gov.uk</a>	01865 816382	07901331799
Sandra Barratt	<a href="mailto:Sandra.pasquet@oxfordshire.gov.uk">Sandra.pasquet@oxfordshire.gov.uk</a>	01865 323457	07785453264
Lorna Berry	<a href="mailto:Lorna.berry@oxfordshire.gov.uk">Lorna.berry@oxfordshire.gov.uk</a>	01865 895955	07912 474375
LADO team	If you can't reach any of the LADOS team use this contact <a href="mailto:Lado.safeguardingchildren@oxfordshire.gov.uk">Lado.safeguardingchildren@oxfordshire.gov.uk</a>	01865 810603	
Multi-Agency Safeguarding Hub (MASH)	For all immediate concerns about a child <a href="mailto:Mash-childrens@oxfordshire.gcsx.gov.uk">Mash-childrens@oxfordshire.gcsx.gov.uk</a>	03450507666	
LCSS Central	For any non-immediate concerns and for no names disclosures <a href="mailto:LCSS.Central@oxfordshire.gov.uk">LCSS.Central@oxfordshire.gov.uk</a>	03452412705	

## Cambridgeshire Local Authority and Safeguarding services:

LADO	<a href="mailto:lado@cambridgeshire.gov.uk">lado@cambridgeshire.gov.uk</a>	01223 727 967 (office hours) 01733 234 724 (emergency)
MASH	<a href="mailto:MASH.C&amp;F@cambridgeshire.gcsx.gov.uk">MASH.C&amp;F@cambridgeshire.gcsx.gov.uk</a>	03450455203 (office hours) 01733234724 (out of hours)

Updated: July 2021

Review: July 2022 (or sooner if required)



# Student Attendance Policy

1. It is important that students are present for all compulsory activities and that staff are always aware of their whereabouts. Registration must be adhered to by all staff and students:

- a. All students must come down to breakfast to register by 8:45am
- b. All students must register after the evening activity.
- c. Students must register after lunch.
- d. Students must report to a staff member from their group at the beginning of every compulsory group activity. Students will be told in advance when and where they will be expected to be present.
- e. Students must sign out with their group leader in groups of 3 or more when they are permitted unsupervised free time. They must then sign back in at the time they are given.
- f. In addition, all students must carry their mobile phone, the number of which the pastoral staff will always have to hand. Students must remain contactable throughout the day, ensuring their phone is sufficiently charged.

Updated: January 2020

# Student Discipline Policy

1. Universify Education requires all students to abide by a set of common rules. All the rules are in place to protect students and to ensure that all of our students are able to make the very most of their time with us. All students are provided with Student Rules.

## **Behaviour Guidelines**

2. We expect our students to make the most of their stay with us by following these guidelines:

- Safety – don't do anything that could put yourself or others in danger. Make sure a member of staff always knows where they are.
- Respect – treat other people and the college with respect
- Organisation – be prepared for lessons and activities. Be punctual.
- Instructions – follow all instructions given by Universify Education staff and members of college.
- Effort – make a good effort at everything during the course

## **Rules and Discipline**

3. Failure to comply with the course rules, provided on our website and in the student handbook, will lead to Universify Education taking disciplinary action. This includes a series of steps, clearly described below, which can lead to dismissal from the course depending on how bad the behaviour was.

4. Universify Education reserves the right to amend these rules as it sees fit. The rules are not designed to be exhaustive and where an action falls outside of the scope of these rules, Universify Education reserves the right to initiate disciplinary sanctions, which are listed below.

## **Sanctions**

5. Staff have full discretion in what level of sanction to apply. Being honest and genuinely remorseful may lead to less serious sanctions being imposed, whilst being dishonest may make matters worse. We will also consider your previous conduct and levels of engagement with the course when deciding the most appropriate sanction.

6. The levels of sanctions at Universify Education are: Warning, Minor Sanctions, Major Sanctions, Final Warning, and Dismissal.

### **Warnings**

7. Warnings can be given by any member of staff if they are unhappy with any aspect of your behaviour. The staff member will make a record of this, and may speak to your Group Leader, but no further action will be taken if you don't break the rules again. Warnings will be given for any behaviour contradictory to the five guidelines you have been given; Safety, Respect, Organisation, Instructions and Effort. Being late, behaviour likely to annoy others on college site and being disorganised are examples of actions that will result in a warning.

### **Minor sanctions**

8. Minor Sanctions may involve a loss of privileges or missing an activity. Your Group Leader will take the decision to impose minor sanctions and will decide what these sanctions will be. Minor sanctions may be imposed if:

- a. You have already been warned but you continue to break the rules, or
- b. There is a serious infringement of the rules.

### **Major sanctions**

9. Major Sanctions are similar to minor sanctions but for a longer duration/greater impact and your parents will be contacted. Bullying, rudeness, and leaving site without permission are examples of behaviour that will lead instantly to a major sanction. They will be imposed if:

- a. You continue to break the rules after minor sanctions have been imposed, or
- b. There is a serious infringement of the rules, likely to have had an impact on others and/or your safety and/or wellbeing.

### **Final warnings**

10. Final Warnings involve a meeting with the Course Director, and in certain cases the Programme Manager. You will have to sign an agreement acknowledging that this is a Final Warning. Your parents/guardian will be informed. Further sanctions may also be imposed. Possession of banned items will

lead automatically to a Final Warning (and, potentially, instant dismissal) as will serious instances of bullying and rudeness. A Final Warning will be imposed if:

- a. You continue to break the rules after major sanctions have been imposed, or
- b. There is a very serious infringement of the rules which calls into question your suitability to remain on the course.

### **Dismissal**

11. Dismissal will be imposed for the most serious of disciplinary issues, or sustained unacceptable behaviour. If you are dismissed from the course, you will be sent home at the expense of you/your parents/guardian, as early as practically possible. You may be excluded from teaching and activities before you leave and you may be required to move to a room off campus if you cannot be put on a flight back home that day. You are likely to be dismissed if we believe you remaining on the course would pose a risk to your own or other students' welfare, or if you break UK law.

Updated: January 2020

# Trips and Activities Policy

(including the Code of Practice for Staff on Excursions)

1. Universify Education by its very nature has a large number of off-site trips and activities it is important that staff are aware of their responsibilities and that students' safety and welfare is upheld at all times.

## **Before the trip or activity**

2. If any visit, educational, sporting or social, involves any element of dangerous activity, the relevant risk assessment should be consulted.

3. The relevant risk assessment will be consulted before any day trip

## **Staffing Matters**

4. Staff accompanying the trip are responsible for the behaviour and wellbeing of students.

5. Trips must be preceded by a staff brief covering:

- a. Risk assessment
- b. Timings
- c. Emergency procedures
- d. Student medical needs
- e. Relevant contact numbers
- f. Itinerary
- g. The designated lead for each coach (where applicable)

6. Following the staff brief students should receive a trip brief from Group Leader covering:

- a. Timings
- b. Emergency procedures
- c. Relevant contact numbers
- d. Itinerary
- e. Points of interest about the trip
- f. Expectations of behavior
- g. What to bring

## **The Trip**

7. Each Group Leader should bring:
  - a. their issued First Aid Kit
  - b. at least two hard-copy lists of their students on the trip and accompanying photos of their students
  - c. Signs for the bus
  - d. Any maps or other relevant information should be given out.

Check students':

- e. suitability of clothing for the trip.
- f. all students have the emergency contact numbers.
- g. All students have necessary medication.

A register is taken:

- h. Before boarding any transport
- i. On arrival at the destination
- j. On regrouping
- k. At any point when the journey is broken
- l. On departure

Once all the occupants are on the bus, the doors must be closed and a final name check and head count done. This is the responsibility of the designated leader of each bus.

8. Every check should be by name and not just by a "head count".
9. When using transport staff must ensure all seat belts are fastened and students remain on their designated bus.
10. Staff are responsible for good behaviour on any transport including:
  - a. Not dropping litter
  - b. Abiding by drivers' rules including food and drink
  - c. Alcohol is not consumed on any Universify Education transport
11. A staff member must be the first off the coach or out of the minibus to guide students off safely.

## **On Arrival**

12. Where appropriate the Group Leader provides the list of students and timings on the trip to the main reception.

13. A central meeting point is established and communicated to students. Students are reminded:

- a. What to do if lost
- b. Emergency procedures
- c. Timings they need to adhere to

## **Incidents**

14. All incidents should be dealt with and recorded according to the same incident reporting process used throughout the course.

Updated: January 2020

# Missing Student Policy

## Preventative measures

- a. All staff members are required to keep track of all students assigned to their group at all times, irrespective of student age. If the student is on free time, you must know when you are expecting to see them again, and the student must be clear on when they are expected to be seen again. Someone is missing as soon as they are not in a place they ought or have told to be.
- b. Roll call your students by name, regularly. You must do this:
  - i. Every morning
  - ii. Every evening
  - iii. Before getting onto transport
  - iv. After getting onto transport
  - v. Before going into a visit location
  - vi. Before leaving a visit location
  - vii. Whenever you have moved the group through a busy area
  - viii. Use common sense in roll calling at necessary times
- c. Have a register of your students for all trips and visits
- d. Reinforce the policy that no student may leave his or her group for any reason without speaking to the Group Leader.
- e. Reinforce the practice that other students in the group should tell the Group Leader or other appropriate staff member if they notice that their buddy or anyone else in the group is not present
- f. Do not become so involved in the activity at hand that the staff member loses track of the participants. Always know where everyone is.
- g. Do not allow students, particularly under 18s, to be idle for long periods; idle children look for something else to do and wander off without even realising that they are leaving the group environment.

## Should a student go missing

- h. If a student goes missing, the following steps must be followed:
  - a. On a trip or visit:
    - Remain calm to avoid disquieting the other students
    - Call the student's mobile phone
    - Stop the activity and ask the students about the



last time they saw the missing student and if they know where they went. If no one knows, pull the group together, have them sit on the ground or floor, tell them that you will be right back to restart the activity, and leave them with another member of staff. Never leave the group alone. Call for back-up if no helper is present.

- Call the Course Director and tell them that you are beginning a contained search in the immediate area.
- Don't hesitate in seeking help to track a student down. This could be a police officer in the vicinity, visit attraction employee, etc ie anyone who can help secure the area and co-ordinate others to help. Provide the name, basic characteristics of the student (hair colour, age, size, weight), any description you may have that would help others search (such as clothing that they were wearing), and how long it has been since anyone has seen the student.
- Call the Course Director, Head Office or Duty Holder. Make sure that you speak to someone - don't just leave a message. Additional support will be brought to you as soon as possible.

b. Inside the college:

- Check with student's friends, roommate, all staff members etc. Have 2 staff check the student's room.
- Search the immediate premises including halls, toilets, and other activity areas. Call the student's name as you search.
- Inform the porters to help watch the exits to prevent the missing student from leaving the site.
- Go outside and do a sweep around the perimeter of the building.
- If student is still not found and has not responded to calls/texts, inform the lodge.

c. In all cases:

- Keep calling the student's mobile
- Keep all staff up to date, at all times
- As soon as you feel that you have exhausted the obvious options, report the matter to Head Office/Duty Holder
- Tell everyone involved as soon as the student is found

- If the police become involved, the parent should be informed by the Head Office.

Updated: January 2020

# Visitor Policy

1. Security of all persons at Universify Education is of the highest priority, and the security of students is paramount at all times. Universify Education takes all reasonable steps to prevent unauthorised entry to its premises, in line with the need to strike a reasonable balance between security and access for parents, tutors and other potential visitors.

## Security

2. Different sites have different levels of access, and some college sites are shared with other summer courses, therefore for security:
- a. Only Universify Education can have access to student accommodation (with the exception of parents/guardians during pick-up and drop-off days, college cleaning staff and, where necessary, college staff).
  - b. Staff should exercise vigilance and common sense when dealing with a situation in which a visitor is present on the college site, particularly if they are interacting with students.
  - c. Staff should challenge un-badged strangers without putting themselves at risk, particularly if they are acting in an unusual way (e.g. they are unaccompanied and in an unusual area such as a private office, a classroom or a boarding area). Un-badged strangers should always be reported to college or Universify Education staff.
  - d. Valuables which are left unattended are vulnerable to pilferers and opportunist thieves. Staff and students are personally responsible for the security of their possessions.

## Visitors

3. All visitors (except uniformed emergency service personnel on an emergency call) must book in with the Group Leader of the student they are visiting. Visitors will be escorted by a member of staff until they have joined their student.

## Family Visits

4. Family members and friends are welcome to visit our students while they are on the course with us, but it is important that this is in accordance with the regulations

below:

- a. Permission for a non-emergency visit must be sought from the Course Director at least 48 hours before the time of the intended visit.
- b. The Course Director reserves the right not to give permission if there is a serious and unworkable clash with the timetable, e.g. being away on a day-trip.
- c. Visits may be organised during a day trip, but these must also be approved in writing by the Course Director 48 hours before. The rest of the visitor policy still applies to these visits.
- d. In an emergency, the Course Director must be contacted and a Member of Staff will meet the visitors at the College entrance, or other appropriate location to facilitate the meeting with the student concerned.
- e. In accordance with the Visitor Policy, all visitors, including parents/guardians and other family members, must register with a staff member on arrival. They must not turn up at the College site without notifying the Course Director.
- f. All visitors must comply with the College's visitor rules, while on the College site.

Updated: January 2020

# Staff and volunteer recruitment and payment policy

## Introduction

1. Staff and volunteers are vital to the operations of Universify Education. They provide support to the organisation and to those enrolled on the programme. The purpose of this policy is to ensure that we recruit and maintain staff fairly.

## Staff and Volunteer Recruitment

2. The recruitment processes are as follow;
- a. A skills audit must be performed to identify the skills and experience needed prior to advertising paid and voluntary opportunities. The results of the audit will then be used to determine the requirements needed to include within the job description.
  - b. Prior to advertising the vacancies, the roles both paid and voluntary must be summarised and included within the advertisement. This is to help potential candidates better understand their roles within Universify Education.
  - c. To encourage a diverse range of applicants, vacancies can be advertised online utilising Universify Education social media channels such as Facebook and LinkedIn. Universify Education should also utilise its existing connections by advertising through board members' social media channels and the Universify Education Website.
  - d. Once applications for staff and volunteers have been received the Universify Education staff member in charge of recruitment will select appropriate candidates to invite for interviews. At the interviews the selected applicants will be assessed further, decisions of the successful candidates will then be collective made between the staff member in charge of recruitment and the Universify directors.
  - e. Preceding the appointment of the chosen candidate both voluntary and paid will be asked for references. All staff and volunteers will apply for

DBS checks once appointed.

- f. The successful candidates will then go through an on boarding process of meeting senior members and others that are involved with Universify Education.

In addition to this recruitment process all staff and volunteers are subject to our Safer recruiting policy.

3. To ensure a fair and non-discriminatory recruitment process Universify Education will follow the UK Employment legislations

### **Induction and Training**

4. Additional training required by the roles should be clearly stated within the vacancy advertisements.
5. Depending on the role of staff and volunteers appropriate training will be discussed and arranged by Universify Education.

### **Paid Staff**

6. Salary amount for staff must be agreed by the board of trustees and directors prior to appointment. Payment amounts should be agreed in line with the financial forecast of the Charity.
7. Details of hours, duties and payment will be described in detail within staff contracts.

### **Reviewing the volunteer and staff recruitment and pay policy**

8. This policy is subject to review and changes in accordance to changes in Employment Laws and Universify Education operations.

Updated: January 2020

# Universify Education Conflict of Interest Policy

## Introduction

1. The purpose of this policy is to protect the integrity of Universify Education and to enable volunteers, staff and beneficiaries to have confidence in the organisation's decision-making process. The policy has been written in accordance with the Charity Commission guidance and Companies Act 2006.
2. According to the Charity's Commission guidance conflicts of interest can be defined as "...any situation in which a trustee's personal interests or loyalties could, or could be seen to, prevent them from making a decision only in the best interests of the charity."
3. According to Companies Act 2006 section 252 defines persons "connected" as;
  - a. members of the director's family (see section 253);
  - b. a corporate body with which the director is connected (as defined in section 254);
  - c. a person acting in his capacity as trustee of a trust—the beneficiaries of which include the director or a person who by virtue of paragraph (a) or (b) is connected with him, or the terms of which confer a power on the trustees that may be exercised for the benefit of the director or any such person, other than a trust for the purposes of an employees' share scheme or a pension scheme;
  - d. a person acting in his capacity as partner of the director, or a firm that is a legal person under the law by which it is governed and in which—the director is a partner,
    - a partner is a person who, by virtue of paragraph (a), (b) or (c) is connected with the director, or
    - a partner is a firm in which the director is a partner or in which there is a partner who, by virtue of paragraph (a), (b) or (c), is connected with the director.
4. The wording of 'trustee' within the statement above also applies to directors as Universify Education is a limited company

by guarantee. It is the directors' and trustees' legal duties to ensure that they act only in the best interest of Universify Education. Staff and volunteers should also understand and follow the policy.

### **In practice**

5. To avoid any conflicts of interest, whether that be personal, professional or business, and which could influence decisions being made without the interest of the charity the directors and trustees must identify and declare any potential conflicts of interest.
6. Once appointed as a director or trustee one must disclose in writing any connections that could potentially be in conflict, such as but not limited to personal relationships or a post held at another competing organisation. Staff and volunteers are to also declare any personal or business interests that may influence any decisions made against the charity's best interest. Written declarations will then be kept and updated when applicable.
7. If a personal relationship between two employees, directors and trustees develops within the organisation, the onus is on those involved to declare the relationship. The declaration will then help monitor that any decisions made by the charity were not influenced by personal relationships. Universify Education reserves the right to move one of the employees concerned if it deems it necessary to do so.
8. Any trustee's benefits and pay are to be discussed and authorised by other trustees, Universify Education directors and the Charity Commission. The benefits and pay must then be declared, recorded and updated when applicable.
9. If in doubt any potential conflict must be declared anyway, and clarification should then be discussed by other directors and trustees.

### **Managing conflicts of interest**

10. In the case of conflict of interests being identified and declared due to loyalty owed to another organisation or connected person, the unconflicted directors and trustees can authorise conflicts of interest by applying the conditions below;
  - a. the conflicted director is absent from the part of the meeting at which there is discussion of any



- arrangement or transaction affecting that other organisation or person;
- b. the conflicted director does not vote on any such matter and is not to be counted when considering whether a quorum of directors is present at the meeting;
- c. the unconflicted directors consider it is in the interests of the charity to authorise the conflict of interests in the circumstances applying.

11. The conditions above are also listed within section 9 of the Universify Education Governing Document.

Updated: January 2020