



PORTFOLIO OF SUPPORTING POLICIES AND DOCUMENTS



JANUARY 1, 2020
College of Companion Animal Studies (CCAS)

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Portfolio of supporting Policies CCAS

Introduction

The College of Companion Animal Studies aims to provide industry relevant qualification relating to animal care and welfare. The organisation is run by experienced industry experts with over a decade of teaching experience.

Student progression and achievement is our main focus and we will provide support for students and related work placements online, via telephone and face to face.

1.10.1 Staffing Structure

The college is owned by Miss Kelly McGrath and Miss Jenny Best. Both hold sufficient qualifications in relation to animal care, veterinary care and hydrotherapy. Both hold a level 5 teaching qualifications, Level 4 A1 & V1 awards.

All aspects of running the college e.g. exam booking, assessment completion and post internal verification will be completed by either Miss Best or Miss McGrath.

As the college grows bigger Miss Best and Miss McGrath will take a quality assurance role focusing on internal verification and standardisation. At this point suitably qualified teachers will be employed to maintain day to day running of the course and ensure all materials are up to date and meet current industry standards.

1.10.2 Procedure for Internal Moderation

The key principles underlying internal verification are that:

Each course or group of courses has a named lead internal verifier / moderator and an appropriate number of internal verifiers/moderators.

A sampling plan will be produced either at course, assessor, programme or centre level on a risk based approach in line with Awarding Body guidelines.

Individual assessment briefs are internally checked before being distributed to learners, where assessment is not prescribed by the awarding body. If any issues are identified by the Internal Verifier, they should be addressed by the Assessor prior to issue.

A representative sample (minimum 10%) including a selection of assessments / assignments from all assessors across all units / modules / levels and across all assessment sites is internally verified or moderated

Evidence requirements are met, appropriate standards maintained and assessment is valid, authentic, practicable equitable and fair

Internal verification/moderation ensures that assessors clearly understand what evidence is required to meet the assessment outcomes / criteria.

Internal verification/moderation provides appropriate feedback to assessors.

Records are kept of the IV/moderation process and made available for audit.

Where IV takes place in the workplace, any health and safety issues which are noted during the IV visit are reported to the divisional health and safety representative to action as appropriate.

The outcomes and any actions resulting from internal verification / moderation are followed up, acted upon, reported and signed off in course internal verification / moderation meetings.

Appeals are documented and where appropriate, forwarded on to the external verifier / standards moderator, in line with the awarding body's requirements.

Standardisation / moderation should take place when a unit or assignment is delivered and assessed by more than one person, standardisation must be carried out before any formal assessment and internal verifications has taken place. Standardisation is the process to discuss and mutually assess a sample of learner work to reach a consensus. This will be done with reference to the assessment criteria and assessment guidance provided in the qualification specification.

An audit of the internal verification and standardisation /moderation processes in each Department/Curriculum/Centre/ Operational area will take place at least once each year with formal reports presented to the senior management team.

1.10.3 Procedures for managing Internal & External Assessment /Examinations and Invigilation

Internal/External assessments will be programmed in a suitable room in line with the JCQ ICE requirements. The learners will be sat an acceptable distance apart and the room will be free from materials that may aid successful completion of the assessment. The environment will be an appropriate temperature and the level of noise will be kept to a minimum, this will be supported by the appropriate signage of 'examinations occurring' & 'please be quiet'.

Invigilators will be suitably trained and standardised. Prior to the examination the invigilator will pick up the examination papers and other appropriate documents such as the examination checklist, incident log and expected student details.

Invigilators will be a separate member of staff to the staff member that delivered the course.

The Fit to sit policy applies for all students taking examinations/assessments. This prevents the student appealing for special circumstances follow a failed attempt.

[Fit to Sit Policy](#)

CCAS operates a "fit to sit" policy. This means that if you sit an examination or submit an assignment you are declaring yourself fit to sit the assessment and no extenuating circumstances will be accepted.

If you were to become physically unwell at any point during the examination you must alert the examination invigilator **immediately**. In these cases the invigilator may end the examination to allow you to receive medical assistance.



Once alerted the invigilator will decide whether you can continue with the examination or need to be taken for medical assistance.

Student Name _____

Course _____

Examination _____

Date _____ Signature _____

Invigilator name _____

1.10.4 Procedure for dealing with and reporting Malpractice / Maladministration

Malpractice is an act deliberately undertaken by candidate/s or/and the staff of the approved centre which wrongly gives the impression that assessment criteria has been met, and which may lead to the fraudulent claim of an award or unit certificate.

Malpractice may occur in work based assessment, internal centre examination, tests or external examination.

Malpractice may take a number of forms and may involve individual candidates, centre staff or both (this list is exhaustive)

Candidates

Collusion

Two or more candidates work collaboratively together to provide work based assessment evidence or an assignment for submission. Efforts may be made to superficially disguise the similarities between their work

Plagiarism

A candidate copies the work of another candidate without permission and tries to pass it off as his / her own

Fabrication

A candidate makes up evidence for work based assessment.

Examination malpractice

Candidate may cheat by copying or communicating with another candidate, taking unauthorized materials into an examination or (rarely) employing a proxy to take the examination in their place. All candidates must abide by the JCQ examination rules which will be discussed at induction and prior to each examination.

Staff malpractice

Centre and / or training practice staff may feel under pressure, either from the candidate or as a result of centre / training practice pressures such as shortage of time or resources and a requirement to meet targets, to unfairly assist candidates. This may be via help with producing written work or by being over generous in assessing practical competence or awarding written marks.

Invalid certification claims

Claims for certification are made before all assessment requirements are met

Failure to quality assure

Failure to comply with quality assurance requirements as set out in the OCN Centre documents.

Malpractice is always intentional or the result of grossly neglected procedures. It is distinguished from poor assessment and / or quality assurance practice which results from inexperience and / or unintentional centre maladministration. Centre quality assurance procedures must therefore demonstrate mechanisms to educate, support and supervise both new candidates and staff with regards to acceptable assessment practice.

If a case of malpractice is suspected the centre will investigate the instance.

If a candidates work is involved in an investigation, no claims for certification will be made for that candidate, or any other candidate within that TP until the investigation is over and acceptable practice is resumed.

An action plan should be implemented for the candidate / centre involved.

Confidentiality must be maintained at all times for all of the practice involved.

If after investigation the centre considers that malpractice has occurred the HOC must file a report

1.10.5 Statement on Access to Assessment

The College of Companion Animal Studies (CCAS) (“the College”) requires that learners provide evidence of their learning through assessment.

Assessments may take the form of the following (Assessment types):

- Multiple Choice Questions (MCQ)
- Examinations – both written and MCQ
- Assignments
- Portfolio – either written or eportfolio inclusive of case studies.
- Practical assessment

Assessments need to be fair. This will be achieved by:

- Using the same assessment methods for each learner on the same course
- Standardising the marking approach of the assessors
- Using post internal verification to ensure the marking meets the same level and reflects the grading criteria.

Assessment methods must be appropriate. This will be achieved by:

- The depth and breadth of knowledge required to achieve a pass grade on an assessment will be based upon the course accreditation level.
- The required assessments will contain at least 2 assessment types.

Assessment design and approval:

1. Assessment designs will be created by the curriculum lead. The level of assessment is based on the accredited qualification level.
2. Once designed the assessment is pre-internally verified to ensure that the level of assessment meets that of the course and that the language used is appropriate for the level of learner.

To be able to assess all assessors must hold relevant subject specialist qualifications.

Prior to marking, standardisation of all assessors marking the assessment will take place. The standardised marking will have been completed by the curriculum lead and justifications will be provided.

Assessors will receive College of Companion Animal Studies (CCAS) assessor training and assessments will be countersigned until the assessor is deemed to be marking fairly and consistently inline with the course level/expectation.

Assessors that do not already hold a D32/33 or Assessor award will work towards the qualification taking up to 12 months to complete.

Assessment grades will be centrally held by the College in a password protected document. No paper copies will be held. Back up of the grade document will be locked in a secure place.

Reasonable adjustment

All requests for reasonable adjustments will be processed. Reasonable adjustment application and assessment must have been made prior to sitting the assessment.

Reasonable adjustments that may be approved:

- Allowing extra time to complete the assessment
- Adapting material e.g. Braille
- Learner assistant; Sign language interpreter, reader
- Environmental adaptation; removing stimuli
- Changing assessment type e.g. from written to verbal
- Additional use of technology e.g. voice activated software.

The aim of reasonable adjustment is to allow the student 'their normal way of working'. The assessment method must still meet the requirements of the specification, be rigorous, assessable and be able to be moderated and/or verified.

1.10.6 Procedure for dealing with Complaints

At the College of Companion Animal Studies (CCAS) our intention is to ensure that all complaints are handled promptly, fairly, consistently, and proportionately. This procedure applies to all complaints, both formal and informal, by students, customers and stakeholders.

A complainant who wishes to make a complaint may do so either in writing or verbally.

All complaints made in writing are classed as formal complaints. All complaints made verbally will be classed as an informal complaint.

Complaints can be e-mailed to enquiriesccas@outlook.com.

All complaints will be acknowledged within 5 working days. Following investigation, a response to the complainant will usually be provided within 10 working days of the acknowledgement unless the complaint is particularly complex, when the complainant will be informed of reasons for the delay. Complaints against Staff.

If a complaint is received specifically about a staff member of College of Companion Animal Studies (CCAS) it should be immediately passed to the complaints officer who will review the complaint and take appropriate action. The person who made the complaint will be notified of the outcome within 10 working days, if the investigation into the complaint is likely to cause delay the person who complained will be notified.

An independent Safeguarding and Complaints officer will oversee complaints that have not been satisfied by the centre.

Safeguarding and Complaints officer:

Name James Bidwell

Complaints we cannot investigate:

- A decision made where the correct procedures / processes / regulations have been followed (e.g. disciplinary).
- Anonymous communications.
- Something outside the control or responsibility of the College.

- Something that happened some time ago. Investigations will not take place after twelve weeks of an alleged incident occurring.
- A liability claim, or other litigation matter.
- A complaint regarding an academic judgement on FE work, for example the grade awarded for a piece of assessed work.
- The College will not accept a complaint lodged by a third party, other than a parent, carer or guardian of a 14-17 year old student.

Response

The response – a reasoned judgement – will be sent to the complainant within 15 working days of receiving a complaint; however, complex cases will, unavoidably, take longer to investigate with due care and thoroughness. The complainant will, in any event, be kept informed of the progress of any investigation.

Appeal

Any comments about the way in which the complaint was dealt with, or any appeal against the findings and action, should be made to the director of the college within 10 days of receipt of the outcome. The director will review the evidence and respond to the appellant within 15 working days of receiving the appeal.

Equality Monitoring

To comply with the Equality Act 2010 and ensure fair treatment for all, College of Companion Animal Studies (CCAS) will collect data on the 'protected characteristics' of complainants, i.e.:

- Race
- Disability
- Sex
- Age
- Gender reassignment

- Religion / belief
- Pregnancy / maternity
- Sexual Orientation

All information is confidential, seen by a limited number of staff and College of Companion Animal Studies (CCAS) reporting mechanisms guarantee data protection.

Complaints Made to External Organisations

External organisations will not normally investigate complaints until the College's complaints procedure, including appeal, has been exhausted.

Complaints about Further Education can be made to;

Complaints Team, Skills Funding Agency, Cheylesmore House, Quinton Road, Coventry, CV1 2WT or email complaintsteam@sfa.bis.gov.uk.

1.10.7 Procedure for dealing with Learner Enquiries and Appeals against Assessment Decisions

It is the intention of 'Centre Name' that the assessment process will be transparent, fair and just for all learners. All learners have the right to appeal against any assessment decision.

Any learner may appeal against an assessment decisions if you feel:

- That you have been treated unfairly
- The assessment decision to be wrong or invalid
- The assessment process to be unfair or wrongly carried out
- The assessment or teaching methods to be inappropriate
- The assessment process to be unreliable or inconsistent
- The course work and content not meeting the course outline

A copy of this policy will be publicly displayed. A copy of this policy will be provided to all learners induction. Written records will be kept of all appeals. At any stage a learner can seek the support of an advocate or friend to assist with an appeal.

The stages of the process follow:

Stage 1 In the first instance you should discuss your concerns with your tutor. Your tutor will reply to your concerns within five working days. The decision will be given both verbally and in writing.

Stage 2 If unable to resolve your appeal or complaint informally you can appeal in writing to the Programme Manager at College of Companion Animal Studies (CCAS)(“the College”). Your appeal will be investigated, assessed and a decision will be given to you in writing within 14 days.

Stage 3 If you are still not satisfied with the result of your appeal, you can request for your appeal to be forwarded to an Appeals Committee. The Committee will consist of the directors. The Committee will respond to your appeal in writing within 4 weeks. The result of the Appeals Committee is final.

Appeals Procedure – on placement

College of Companion Animal Studies (CCAS)(“the College”) has an appeals policy across all aspects of student assessment. An addition to this policy focuses on the management of appeals related to assessment and coaching in the work place.

Candidates have a right to appeal against any training assessment decision they feel is unfair or inappropriately carried out.

It is the responsibility of the Clinical Coach/mentor to ensure that their candidates are familiar with the appeals procedure in practice.

Procedure

The Candidate should first discuss the issue with their Clinical Coach/mentor and or Lead Clinical Coach. The Candidate must request the appeal within 10 working days of any assessment decision.

If the issue cannot be resolved the Candidate has the right to refer the appeal to their centres Internal quality assurer (IQA).

The Internal quality assurer (IQA). will review the evidence and issues surrounding the assessment and discuss the appeal with the Candidate and Clinical Coach.

Appeals to the Internal quality assurer (IQA) must be by the Candidate within 10 working days after discussing the issue with the Clinical Coach and a decision made by the Internal quality assurer (IQA). within 10 working days.

The candidate will be kept informed at all stages

1.10.8 Staff Recruitment / Induction / Development Policy / Statement

CCAS will ensure that all staff are suitably qualified for the role that they are employed to complete.

All staff will be given training on the below if their employed role requires so:

- Learner registration and certification

- Internal moderation training
- Assessment training
- Assessment tools e.g. ePortfolios

All teaching staff permanent or freelance will be required to hold the below:

- National teaching qualification: Level 3 Award in Education and Training, equivalent or higher.
- Specialist qualifications at least one level higher than the teacher is assessing.
- Working toward or hold a D32/33, A1 or relevant TAQA award.

Induction of staff will include training on:

- Safeguarding learners
- Review of all policies and procedures relevant to role
- Professional working
- Systems training

Each new staff member will be assigned a mentor to support the staff member until they are deemed to hold sufficient knowledge of the working practice of CCAS.

All assessor staff will be subject to regular internal quality assurance checks and will be given timely and constructive feedback.

Regular feedback will be gathered from learners to aid with the review of staff support, creation of learning materials and assessment feedback quality. This will inform the staff bi-annual review of performance and the annual appraisal.

The feedback gained from learners, mentor and the staff member will inform the individuals and companies need for staff development and the staff member will be supported through the development process.

1.10.9 Health and Safety Policy / Statement

STATEMENT OF GENERAL POLICY

College of Companion Animal Studies (CCAS) fully accepts the obligations placed upon it by the various Acts of Parliament covering health and safety.

Safety Officer

The Safety Officer is a nominated manager responsible for co-ordinating effective health and safety policies and controls across the organisation.

The Safety Officer is responsible for:

- the production and maintenance of the Company's policy and ensuring that Department Guidelines are consistent with policy;
- its application;

- monitoring and reporting on the effectiveness of the policy;
- the provision of general advice about the implication of the law;
- the identification of health and safety training needs.
- the safety officer is the Company's formal link with the Health and Safety Executive, Environment Health Departments and other external agencies;
- the production and maintenance of any health and safety documents or codes of practice as necessary for any relevant area of the Company services where this is required.

HEALTH AND SAFETY MANAGEMENT PROCESS

College of Companion Animal Studies (CCAS) believes that consideration of the health, safety and welfare of staff is an integral part of the management process. The provision of the Health and Safety at Work etc Act, associated Codes of Practice and other relevant Directives will be adopted as required standards within the Company. Responsibility for health and safety matters shall be explicitly stated in management job descriptions.

The College of Companion Animal Studies (CCAS) approaches health and safety in a systematic way, by identifying hazards and problems, planning improvements, taking executive action and monitoring results so that the majority of health and safety needs will be met from locally held budgets as part of day-to-day management, although many health and safety problems can be rectified at little additional cost.

HEALTH, SAFETY AND WELFARE GUIDELINES

It is the policy of College of Companion Animal Studies (CCAS) to require departmental managers to produce appropriate departmental health and safety policies or guidelines. These should embody the minimum standards for health and safety for the department and the work organised within it.

It shall be the responsibility of the manager to bring to the attention of all members of his or her staff, the provisions of the guidelines, and to consult with appropriate Health and Safety Representatives about the updating of these guidelines. Suggested model contents of a guideline are:

- a clear statement of the role of the department;
- regulations governing the work of the department;
- clear reference to safe methods of working, for example nursing procedures, manufacturers' manuals;
- information about immediate matters of health and safety concern, such as fire drills, fire exits, first aid;
- training standards;
- the role and identity of the Health and Safety Representative;
- names of specialist advisers who can be approached about the work of the department;
- the manager responsible for organisation and control of work;

- accident reporting procedures;
- departmental safety rules;
- fire procedures;
- policies agreed by the Company.

IDENTIFICATION OF HEALTH AND SAFETY HAZARDS

ANNUAL AUDIT AND REGULAR RISK ASSESSMENTS

It is the policy of College of Companion Animal Studies (CCAS) to require a thorough examination of health and safety performance against established standards in each department, **at least** annually. The technique to be adopted for such examinations will be the 'Safety Audit'. The Audit requires review of:

- standards laid down in the policy;
- departmental guidelines;
- relevant regulations;
- environmental factors;
- staff attitudes;
- staff instructions;
- methods of work;
- contingency plans;
- recording and provision of information about accidents and hazards and the assessment of risk.

The information obtained by the Audit will be used to form the basis of the plan for the department for the following year.

Managers have a continual responsibility for the elimination of hazards in order to maintain a safe working environment and will also be expected to carry out regular **risk assessments** in line with the Health and Safety Executive Guidelines; that is follow the 5 steps:

- Identify the hazards
- Decide who might be harmed and how
- Evaluate the Risks and decide on precautions
- Record the findings and implement the precautions
- Review the assessment and update when necessary

SAFETY REPRESENTATIVES

College of Companion Animal Studies (CCAS) will support Safety Representatives in carrying out their role and give all reasonable assistance. Safety Representatives will be encouraged to discuss specific health and safety issues with the relevant Head of Department. They may also formally report hazardous or unsafe circumstances to the Head of Department and will be formally notified of the remedial action taken or be given a reason why the action cannot be taken.

TRAINING

Health and Safety training shall be incorporated within annual training programmes, as part of the development of a systematic training plan. Health and Safety training needs will, therefore, be identified and planned for in the same manner as other training needs.

RECORDS, STATISTICS AND MONITORING

The Company will operate systems for recording, analysis and presentation of information about accidents, hazard situations and untoward occurrences. Advice on systems will be provided by the Safety Officer, in conjunction, where appropriate with specialist advisory bodies for example local Environmental Health Departments, and the responsibility for the operation of these systems rests with managers and supervisors at all levels. Information obtained from the analysis of accident statistics must be acted upon and, where necessary, bids for additional expenditure made to the Chief Executive.

REPORTS TO THE HEALTH AND SAFETY EXECUTIVE

The responsibility for meeting the requirements of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1985 (RIDDOR) to the Health and Safety Executive, shall rest with the Chief Executive as delegated to the Safety Officer.

THE OCCUPATIONAL HEALTH SERVICE

It is the policy of the Company to obtain independent Occupational Health advice when required. Such services can include counselling on health and associated matters, investigation of hazards and accidents, environment studies, health interviews and employment medicals.

FIRST AID

It is the policy of the Company to make provision for First Aid and the training of 'First Aiders' in accordance with the First Aid Regulations (1982). The Safety Officer is responsible for ensuring the Regulations are implemented and for identifying training needs.

FIRE

The Chief Executive is responsible for ensuring that the staff receive adequate fire training, and that nominated fire officers are designated in all College of Companion Animal Studies (CCAS) premises. The Chief Executive delegates these responsibilities to the Directors.

In addition the Company will nominate a Fire officer who will:

- report and advise on the standard of fire safety in the Company's premises and the standard of fire training of its staff;
- undertake overall responsibility for fire training;
- assist in the investigation of all fires in the Company's premises and to submit reports of such incidents.

LIFTING AND HANDLING

Managers are responsible for informing staff of safe lifting techniques. The Safety Officer will identify specific training needs and ensure training in lifting and handling is provided to staff who require it.

NON-SMOKING ON COMPANY PREMISES

College of Companion Animal Studies (CCAS) policy is that there will be no smoking in its buildings. The overall aim is to reduce smoking and so save life, reduce risk of fire, prevent unnecessary illness and chronic disability. These rules also extend to e-cigarettes / vaping.

CONTROL OF SUBSTANCES HAZARDOUS TO HEALTH

The Control of Substances Hazardous to Health Regulations (COSHH) require the Company to identify those substances which are in use and which are hazardous to health (as legally defined) and to assess the risk of those substances. The Company must also provide and use controls to prevent exposure to substances hazardous to health; maintain controls by monitoring exposure, or by health surveillance of employees; and provide information, instruction and training for employees on all these matters. The Safety Officer is responsible for implementing these Regulations.

COMPUTER INSTALLATIONS AND VISUAL DISPLAY UNITS

All new computer installations must adhere to the British Standard Specifications and comply with the Health and Safety (Display Screen Equipment) Regulations 1992. All new employees operating such equipment are expected to read the Health and Safety Executive guidance entitled 'Working with Display Screen Equipment'. New employees who regularly use VDUs will be required to undergo sight screening.

CONTROL OF WORKING TIME

College of Companion Animal Studies (CCAS) is committed to the principles of the Working Time Regulations. No member of staff is expected to work more than 48 hours per week (including overtime) unless there are exceptional circumstances. Similarly all other requirements of the regulations e.g. in relation to breaks, night workers etc. will be complied with.

HEALTH AND SAFETY AND THE INDIVIDUAL EMPLOYEE

The Health and Safety at Work Act requires each employee 'to take reasonable care for the Health and Safety of himself and of other persons who may be affected by their acts and omissions' and co-operate with management to enable management to carry out their responsibilities under the Act. Employees have equal responsibility with the Company for Health and Safety at Work.

The refusal of any employee to meet their obligations will be regarded as a matter to be dealt with under the Disciplinary Procedure. In normal circumstances counselling of the employee should be sufficient. With a continuing problem, or where an employee leaves their self or other employees open to risk or injury, it may be necessary to implement the formal stages of the Disciplinary Procedure.

1.10.10 Equality and Diversity Policy / Statement

College of Companion Animal Studies (CCAS) recognises that discrimination and victimisation is unacceptable and that it is in the interests of the Company and its employees to utilise the skills of the total workforce.

It is the aim of the College to ensure that no employee or job applicant receives less favourable facilities or treatment (either directly or indirectly) in recruitment or employment on grounds of age, disability, gender / gender reassignment, marriage / civil partnership, pregnancy / maternity, race, religion or belief, sex, or sexual orientation (the **protected characteristics**).

Our aim is that our workforce will be truly representative of all sections of society and each employee feels respected and able to give of their best.

We oppose all forms of unlawful and unfair discrimination or victimisation. To that end the purpose of this policy is to provide equality and fairness for all in our employment.

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

Our staff will not discriminate directly or indirectly, or harass customers or clients because of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation in the provision of the Company's goods and services.



This policy and the associated arrangements shall operate in accordance with statutory requirements. In addition, full account will be taken of any guidance or Codes of Practice issued by the Equality and Human Rights Commission, any Government Departments, and any other statutory bodies.

RESPONSIBILITIES OF STAFF

Responsibility for ensuring that there is no unlawful discrimination rests with all staff and the attitudes of staff are crucial to the successful operation of fair employment practices. In particular, all members of staff should:

- comply with the policy and arrangements;
- not discriminate in their day to day activities or induce others to do so;
- not victimise, harass or intimidate other staff or groups who have, or are perceived to have one of the protected characteristics.
- ensure no individual is discriminated against or harassed because of their association with another individual who has a protected characteristic.
- inform the college if they become aware of any discriminatory practice.

THIRD PARTIES

Third-party harassment occurs where a College of Companion Animal Studies (CCAS) employee is harassed, and the harassment is related to a protected characteristic, by third parties such as clients or customers. College of Companion Animal Studies (CCAS) will not tolerate such actions against its staff. The Company will fully investigate and take all reasonable steps to ensure such harassment does not happen again.

RIGHTS OF DISABLED PEOPLE

The College of Companion Animal Studies (CCAS) attaches particular importance to the needs of disabled people.

Under the terms of this policy, College of Companion Animal Studies (CCAS) will:

- make reasonable adjustment to maintain the services of an employee who becomes disabled, for example, training, provision of special equipment, reduced working hours.
- include disabled people in training/development programmes;
- give full and proper consideration to disabled people who apply for jobs, having regard to making reasonable adjustments for their particular aptitudes and abilities to allow them to be able to do the job.

EQUALITY TRAINING

A series of regular briefing sessions and memos will inform staff of equality issues/changes.

MONITORING

The College of Companion Animal Studies (CCAS) deems it appropriate to state its intention not to discriminate and assumes that this will be translated into practice consistently across the organisation as a whole. Accordingly, a monitoring system will be introduced to measure the effectiveness of the policy and arrangements.

The system will involve the routine collection and analysis of information on employees by gender, marital status, ethnic origin, sexual orientation, religion / beliefs, grade and length of service in current grade. Information regarding the number of staff who declare themselves as disabled will also be maintained.

There will also be regular assessments to measure the extent to which recruitment to first appointment, internal promotion and access to training/development opportunities affect equal opportunities for all groups.

GRIEVANCES/DISCIPLINE

Employees have a right to pursue a complaint concerning discrimination or victimisation via the Company Grievance or Harassment Procedures.

Discrimination and victimisation will be treated as disciplinary offences and they will be dealt with under the Company Disciplinary Procedure.

SEND POLICY

College of Companion Animal Studies (CCAS) (“the College”) believes that:

- The success of all students is the shared responsibility of all staff
- All students are entitled to a broad and balanced curriculum which is personalised and focused on outcomes
- Teaching and learning should be adapted to suit the needs of learners and recognise different routes to achievement
- Early and accurate identification of Special Educational Need, and/or Disability (SEND), is essential
- There needs to be a flexible continuum of provision for students with SEND
- It is important that staff are given appropriate training to allow them to meet a wide range of SEND needs within the student community they teach.
- Students should be encouraged to provide their feedback on learning as part of continuous improvement

1. An environment where students progress and achieve to their potential, based upon a timely assessment of need, which results in a supportive, secure and enabling environment where the student feels valued
2. Access to a broad, balanced, curriculum with sufficiently individualised targets and assessment opportunities taking into consideration the views and wishes of students, or their advocates, and accounting for their age, maturity and capability
3. Access to an appropriate study programme, a full range of college services, and the wider aspects of college life
4. Effective access to appropriate members of College and, where appropriate, external support staff to ensure that an individual's needs are fulfilled

The College seeks to ensure that all individuals are supported to fulfil their academic potential through the mitigation, wherever possible, of any barriers. In addition, this policy is guided by the College's statutory responsibilities under the Children and Families Act (2014) as defined by SEND Code of Practice (2015), which identifies that 'mainstream educational settings (including post 16 institutions) must use their best endeavours to secure the special educational provision called for by the student's or young person's needs.'

The SEND Code of Practice sets out the vision that: "Professionals who work with students and young people who have a special educational need should strive to enable them to achieve at school and college, and make a successful transition to adulthood, including finding paid work, living independently and participating in their community."

To this end the policy seeks to ensure that the needs of all applicants who have special educational needs and disability are appropriately provided for during their contact with the College by ensuring that each individual (and parents, guardians, and carers where appropriate) has access to:

- appropriate guidance, support, and mentoring prior to enrolling at the college and during their studies
- accurate, and sensitively delivered, assessments which enable the effective planning of transition processes
- a suitable study programme where individual needs can reasonably be met in an educational context, including access to appropriate support and resources
- an agreed programme of support which is based upon the up-to-date, relevant, assessment of needs provided by the individual prior to starting their study programme
- relevant support services, from the date of enrolment to help them achieve
- a regular review of their needs, during their course of study, so that appropriate, relevant, support can be varied or maintained.

The College works with parents and professional agencies to discharge our distinct and statutory duties towards our applicants and our learners. We believe in adopting a graduated approach to SEND on a spectrum of lowest need, which we term 'SEN support' up to those with higher needs

where they have an 'Education, Health and Care (EHC) Plan'. This graduated approach to inclusion, admission and support ensures that the college evaluates and where possible, meets the SEN and disabilities needs through differentiation and consequently our obligations and best endeavours in accordance with the Equality Act 2010.

However, in the unusual event where an EHCP is undeclared prior to admission and where the College is unable to meet additional needs adequately despite best endeavours and all reasonable adjustments, the College reserves the right to withdraw the place.

1.10.11 Statement on Student Support including:

- **advice and guidance procedures-** Please see admissions policy, application process RPL
- **obtaining a Unique Learner Number (ULN) and a Learner Record (PLR) if requested –** Request must be submitted via email to enquiriesccas@outlook.com
- **credit transfer, exemption and Recognition of Prior Learning –** See APL/RPL Policy
- **initial assessment and induction**
Learners will be required to submit an application which will include a statement of academic achievement prior to undertaking the course. CCAS will set the entry requirements for the courses to be able to realistically support learners with progression. Induction of the learner will include; introduction to tutor, online platform, relevant policies and procedures and the process of the chosen course completion.
- **a process to protect the interests of learners in the event of withdrawal –** If at any point the centre were to decide to withdraw from the market the centre would create an exit strategy to protect learners and support them in gaining their qualification.

Admissions Policy

The College of Companion Animal Studies (CCAS) seeks to make the admissions process as smooth as possible. The College welcomes feedback on this policy and processes as part of its transparent and continuous improvement process.

This policy provides applicants with clear statements as to what they can expect from the College and also sets out a number of statements which the College will abide by and in some cases, restrictions which the College is required or has decided to adopt in order to safeguard its wider community or to protect the standards on individual programmes.

This policy applies to all applicants who are seeking admission to either campus of the College for any of the following Further Education (FE) course types including:

- First time applications to full-time programme of study
- Learners who are already at the College and wishing to progress from one programme of study to another
- Part time applicants to either classroom based or work-place study

The College will ensure that applicants receive information on admission, the applicant will speak with the Course Tutors prior to admission in order to help them decide on the course of study best suited to their needs.

The College will provide help and support to applicants at all stages of the admissions process by providing telephone support and by offering applicants the opportunity to view the online platform.

Applicants with disabilities or learning difficulties are guided to access appropriate support from the College's Learning Support teams and will be given the opportunity to disclose their support needs at application.

Applications Process

Application forms are available to be downloaded from the college website.

Application forms are also available in hard copy via email/telephone request.

Applications for full time or part time FE and apprenticeship programmes can be made either by completing and returning a hard copy application by post or by completing an application online

Applicants are regularly updated as to the stage their application has reached and receive replies to all correspondence within 10 working days of receipt.

Entry Criteria

The College has published academic entry criteria for all courses.

Applicants for whom English is a second language may be asked to complete an assessment of their reading, writing and comprehension as a condition of entry.

Students under the age of 16 may be admitted provided that they are enrolled for sound educational reasons, that safeguarding arrangements are in place and that any admission is authorised by the Deputy Principal prior to enrolment.

Applicants for the Veterinary Nursing Care Assistant course planning to progress onto a Level 3 Veterinary Nursing Diploma, will be subject to/reminded of the Royal College of Veterinary Surgeons (RCVS) 'Guidance on Recruitment of Students with Disabilities' and the RCVS fitness to practice guidelines.

Initial Assessment

Any information from initial assessments will be used to determine the appropriate level of study and used as a diagnostic for assessing potential learning support needs for students to help them with their studies. Reasonable adjustments to the initial assessment process may be made for candidates with disabilities.

Equality and Diversity

The College welcomes applications from applicants irrespective of their age, disability, family responsibility, marital status, race, ethnicity, nationality, faith, gender or sexual orientation, in line with the College's Single Equality Scheme.

Special Educational Needs and Disability

College of Companion Animal Studies (CCAS) encourages participation in its learning programmes by all sections of the community and the industries it serves and welcomes applications from applicants who have a disability.

College of Companion Animal Studies (CCAS) will assess whether students with learning difficulties and / or disabilities are able to follow a programme of study most suitable to their needs, with best endeavour to provide appropriate support within available College resources. This support will be monitored and amended as necessary.

If the College is unable to meet additional needs adequately, or can only do so by compromising the learning experience which would disadvantage the applicant, the College undertakes to inform the applicant immediately the situation is apparent.

All applicants who accept an offer will receive an email link to the College online Registration Form which will include a Disability Questionnaire. This will give applicants who have not declared a disability on their original application, the opportunity to inform the College of any help and support that they will require during their studies.

Information provided in relation to disability will be used in the initial assessment of applications to ascertain whether the College offers an appropriate programme of study to adequately meet the needs of the learner.

The Learning Agreement will contain clear statements specifying precisely what the College is offering to the student and details of the commitment the student is making to the College. Any changes to the student's circumstances will automatically require a full review of the Learning Agreement. Applicants with additional needs that are identified part way through their course of study will be counselled and guided through an assessment process to establish how or in certain circumstances whether they can be supported through the remainder of their course.

Curriculum Delivery & Quality Improvement Policy

The purpose of this policy is to provide a policy framework to all those who deliver, enable and support learning. The policy aims to ensure that all decisions and activities support the promotion of excellence in Teaching, Learning and Assessment (TLA), success for all and result in the continual and sustainable improvements in practice.

This policy is placed in the context of The 2014 Professional Standards for Teachers and Trainers

College of Companion Animal Studies (CCAS) (the College) has a sustained commitment to:

1. Placing the learner at the centre of the entire journey from independent advice and guidance to progression to work and/or Further/Higher Education whilst providing support which extends equality of opportunity to all.
2. Planning, delivery, assurance and continual improvement of inclusive TLA that empowers, stretches and challenges every individual appropriately so they meet curriculum expectations and fulfil their individual potential through:

Clear, unambiguous and unbiased advice and guidance aligned to the Matrix Standards and the National Careers Strategy, which utilises staff expertise to assess the skills, knowledge, aspirations and potential of every individual to ensure that they are provided with a programme of study which best fulfils their current, and expressed future, aspirations and needs.

Effective assessment of learners' initial abilities to support the setting of appropriate, but challenging, targets for achievement and to ensure that appropriate support is provided to ensure equality of opportunity in meeting these.

Assessment for Learning that involves the frequent use of:

- a variety of valid, reliable, sufficient, fair assessment methods generating formative, and summative, judgements of learners' progress;
- constructive feedback providing clear targets which, and effective guidance that, enables learners to improve knowledge, skills competence, and the professional skills necessary to support independent learning;
- Accurate and sufficient assessment records that inform learner targets, the planning of delivery, and the reporting of progress to colleagues, learners, and other stakeholders.

Personalisation of TLA which draws upon learners' skills, knowledge and prior experiences to provide a programme of instruction, coaching and support which ensures they progress effectively towards their personal goals.

Facilitation of an interactive, participative, curriculum which involves learners in planning the pace, and content, of TLA so that they develop appropriate professional, independent, learning skills.

As enshrined within the College's SEND policy, the College seeks to ensure that all individuals are supported to fulfil their academic potential through the mitigation, wherever possible, of any barriers. In addition, this policy is guided by the College's statutory responsibilities under the Children and Families Act (2014) as defined by SEND Code of Practice (2015).

Delivery of a broad Study Programme which prioritise the development of independent, professional, learners who (in addition to fulfilling curriculum goals) acquire:

- sustainable personal, entrepreneurial, and employment-related skills which prepare them for future careers;
- research and study skills which support progression, through FE/HE, to further study; o further improvements, including qualifications where appropriate, to Literacy, Numeracy, and Digital Literacy skills.

Pastoral support for all learners which, delivered in a form appropriate to the needs/mode of study, ensures that learners can fulfil their potential by mitigating, as far as practicable, barriers to achievement through:

- Ensuring that all learners have access to pastoral staff who understand, and can respond effectively to, their specific needs within a timely period; o Promoting engagement with

specialist Student Support teams to provide additional technical, or emotional, support to mitigate more severe issues

- Providing access to specialist Learning Support that enables learners to mitigate the potential impact of learning difficulties, or disabilities, upon their studies.
- Ensuring dynamic contributions from students through a range of fora, resulting in quantitative and qualitative analysis of feedback, followed by effective, timely, action to address student requests and requirements within the budget envelope.

Consultation with learners – individually and collectively:

Student surveys are commissioned throughout the academic year to gain feedback on the student experience during their learning journey at the College. ☒ Managers undertake focus group activities with students to elicit feedback about their courses or any other aspects of student life.

3. Ensuring that Quality Assurance, and Quality Improvement, activity effectively identifies opportunities to further develop curriculum delivery through:

- Accurate, and timely, use of information from a range of sources to ensure that, where delivery does not meet expectations, prompt and effective action is taken to identify, mitigate, and remove barriers to progress.
- Empowering innovation, experimentation, and creativity by teachers, coaches, and instructors, to effectively utilise new methods of TLA to ensure that delivery motivates, inspires, and stimulates curiosity resulting in the improved effectiveness and success of learning.
- Delivery of a high quality, responsive programme of Continuing Professional Development that is explicitly focussed upon identifying and fulfilling the needs of practitioners, ensuring that positive impacts can be measured through rigorous follow-up activity.
- The sustainable management and creation of resources, including the learning environment, that enable practitioners to inspire learners, enhance effective integration of theory into practice, and reflect changing expectations of curriculum delivery.

4. Maintaining a culture of professionalism, accountability, and responsibility amongst staff where a sustained committed to raising standards is:

- Providing encouragement, training and support for its employees to gain the skills and qualifications that will support their future employability and meet the needs of the College.
- Informed by experimentation, collaboration, sharing good practice and the meeting of identified requirements for further skills, knowledge and (where appropriate) qualifications.
- Characterised by a staff team who take responsibility for the development and assurance of their own TLA, specialist subject knowledge and contextual development.

[APL policy](#)

The purpose of the Accreditation and Recognition of the Prior Learning Policy (A/RPL) and Accreditation and Recognition of Prior Experience Policy is to identify a process for the College which fits the expectations and requirements of all the stakeholders in the process, namely:

- prospective learners
- examining / awarding bodies and the qualifications offered
- inspecting bodies (Ofsted, QAA, OCN)
- regulatory bodies (Office for Students)

The process for the collection and presentation of evidence for assessment are learner driven. Learners are provided with sufficient information to enable them to provide evidence to 'make their claim'. In the event of difficulties, they will have access to specialist support through subject-specialist A/RPL, A/RPE Advisers. This support will be provided where possible by phone, fax or email. No additional support can be provided unless the learner has enrolled for a course and no certification can be called for until the learner is registered with the awarding body. Although learners will not receive formal tuition during the process of making an A/RPL, A/RPE claim, additional support is given for which a fee will be charged and will need to reflect the volume of work involved in the A/RPL A/RPE, process. The rate will be based on the standard hourly rate calculated at the time and this will be available upon application.

Course Tutors will manage the process from the point at which learners begin their programme of study. This involves assessment, informing Student Admissions of the outcome of the A/RPL A/RPE, learner, internal verification and accreditation.

REASONABLE ADJUSTMENT (Taken from Skills and Education Group/ABC Awards)

A reasonable adjustment is any action that helps to reduce the effect of any barriers or difficulty that places the learner at a substantial disadvantage in an assessment situation.

The general principles which are applied to our decisions about reasonable adjustments are as follows:

- The nature of the reasonable adjustment is determined according to the assessment needs of the individual learner.
- Account is taken of the learner's usual method of working.
- Arrangements are such that they accurately reflect the learner's achievement and competence to work in a sector, and do not give a misleading picture of the learner's ability.
- Arrangements do not reduce the validity and/or reliability of the assessment, and do not compromise the integrity of the assessment;
- No unfair advantage accrues to the learner where reasonable adjustments are applied.

Examples of reasonable adjustment (this is not exhaustive):

Assessment difficulty	Assessed need/available support from centre
Slower reader*	Reader for assessments and coloured paper handouts.
Slower writer*	Scribe
Slower processing*	Additional time provided for assessment completion. Up to 25% extra time depending individual learner need.
Impairment *	Sight- Larger text handouts and appropriate lighting (in line with availability at site)

	Hearing – Recording of lecture/lesson allowed. Lip reading conscious where applicable to individual learner. Short term memory loss – Recording of lecture/lesson allowed. Physical disability (may be linked to learning difficulty e.g. coordination)– Each individual case will be considered and if appropriate removal of practical units may be removed and replaced with additional theory where possible. Unit certification may be available where a full qualification is unable to be gained due to inability to complete practical elements.
Learning difficulty*	Dyslexia – extra time, reader, scribe * ASD – Support as suggested from educational psychologist assessment/EHCP where possible to do so.
*Extent of reading/scribe/support available to the learner will depend on learners identified need, level of qualification and regulatory restrictions. Each learner will be provided with an individual learning plan which will detail the learners needs and support provided by the centre.	

If a learner’s normal way of working is identified as often needing additional support (during delivery and learning activities) or the learner has notified the college that they are struggling or experiencing difficulties during learning the learner will be supported as needed and referred for the appropriate support e.g:

- The centre where applicable will inform the learners school detailing the learning need identified by the centre.
- Depending on severity the centre will direct the learner to an appropriate professional e.g. GP/DR, Assessment centre.

The centre may identify additional learner support needs through:

- Through review of the interview process
- Initial assessment
- Student statements/EHCP
- Students identifying their difficulties
- Tutors/Lecturers identifying the students’ normal way of working.

1.10.12 Procedure for Quality Assurance Review of the Course (monitoring learner progress, review and feedback)

The policy commits College of Companion Animal Studies (CCAS) (“the College to maintain and improve the quality of its teaching and learning provision through the processes of continuous improvement and quality assurance.

The policy applies to all staff and all students. The objective is to embed effective quality processes that are rigorously implemented to foster a culture of continuous improvement in all facets of The College.

The policy focuses on the 10 strategic priorities of The College:

1. To improve the quality of teaching, learning and assessment.
2. To modernise and reform the curriculum.
3. To grow, consolidate or reduce the curriculum offer.
4. To improve student progression, employability and wider student outcomes.
5. To increase the involvement of business/employers in curriculum design and delivery.
6. To enhance the learning environment.
7. To more effectively support students.
8. To more effectively support teaching staff
9. To improve the student voice
10. To develop effective partnerships

The policy supports The College by:

- Ensuring high quality of teaching, learning and assessment.
- Meeting students' needs and facilitating 'Student Voice' activity.
- Meeting the priorities of the Skills Funding Agency (SFA).
- Meeting standards set by national inspection regimes; most particularly OFSTED and QAA.
- Dealing promptly and fairly with complaints
- Meeting the requirements of internal and external audits.
- Meeting Awarding Organisation requirements.
- Meeting the needs of business.
- Identifying strategies for improvement.
- Ensuring quality assurance processes are rigorous.
- Making best use of the talent and energies of the College staff.

College of Companion Animal Studies (CCAS) ("the College is committed to improving the quality of its provision by:

- Ensuring high standards of professionalism through continuous professional development (CPD).
- Implementing rigorous self-assessment processes.
- Embedding effective policies and procedures.
- Analysing performance against college targets and impact assessing necessary interventions.
- Ensuring all staff employed by the College are engaged in improving the quality of provision.

The quality process involves a cycle of activities of which course reviews and self-assessment are central.

The major elements are:

- Identifying and action planning priorities at different levels of The College.
- Establishing performance indicators/targets against which provision is judged.
- Collecting data in order to measure performance.
- Analysing performance against challenging targets and performance indicators.
- Implementing and monitoring quality improvement plans.
- Issuing reports on quality matters for the college leadership team and the governors.

This cyclical process occurs at college, curriculum, team and course level throughout The College.

Implementation and Review

The cyclical self-assessment process is supported by a series of activities, procedures and practices.

It is the responsibility of:

- Leaders to identify the strategic priorities of The College in response to internal and external drivers and initiatives.
- Curriculum lead and other designated staff to develop and review College policies and associated procedures, guidelines and strategies.
- Leaders, Curriculum and Business Support Managers to:
 - Self-assess their area of provision and contribute to the College Self-Assessment Report.
 - Conduct appraisals of all their staff.
 - Establish induction and mentoring arrangements for all new staff or for staff with new responsibilities.
 - Devise and co-ordinate an area training and development plan.
 - Ensure that course teams and teachers keep electronic records of meetings, maintain electronic course files, and complete the annual area self-assessment cycle, including the administration of the induction and student surveys.
 - Carry out a programme of lesson observations/reviews supported by the Quality, Performance and Innovation Department.
 - Maintain and review standard quality service agreements.

It is the responsibility of the Quality Assurance officer to:

- Manage the annual quality cycle.
- Review quality improvement plans (QIP) for impact amending as appropriate.
- Monitor Awarding Organisation reports and action plan where necessary.
- Monitor and report on the complaints procedure, to ensure response targets are met.
- Manage and report on student/employer survey processes and action plan accordingly.
- Manage and report on the lesson observation programme, putting into place recommended improvements.
- Manage and report on internal inspection processes, ensuring recommendations are implemented.
- Provide, manage and report on participation and impact of staff CPD opportunities.
- Manage and report on the impact of the Senior Practitioner team.

- Ensure, through audit, that all staff comply with quality policies and procedures.

Teachers/course teams to complete area self-assessments by:

- Reviewing student retention, achievement, success and destinations.
- Reviewing induction.
- Reviewing teaching, learning, resourcing and assessment in mid-course.
- Providing a Summary Course Review at the end of each course. OR, for short courses, providing a summary course review at the end of each course and to:
- Provide effective and appropriate teaching, training and support for learning.
- Maintain current electronic course files, including electronic minutes of meetings.
- Undertake appropriate development and training.
- Offer flexibility within schemes of work to include all students at all times and to ensure courses fulfil individual needs.

STAFF INVOLVEMENT PROTOCOL

As defined by the Chartered Institute of Personnel and Development (CIPD), staff involvement is ‘a range of processes designed to engage the support, understanding and optimum contribution of all employees in an organisation and their commitment to its objectives’.

The benefits of introducing a Staff Involvement Strategy to the College are anticipated to be:

- Improved decision making processes and outcomes
- Improved efficiency
- Better recruitment and retention of staff
- Greater staff satisfaction
- Better delivery of teaching, learning and other services and therefore improved learner and employer satisfaction

College of Companion Animal Studies (CCAS) will develop and promote a working culture in which the views of staff are embedded in the processes for decision-making about planning, quality of teaching and learning, and proposals for change.

We will abide by the following principles:

- Staff involvement should be a routine part of discussion relating to day to day operations and improvement
- Staff involvement in proposals for change should take place at as early a stage as possible
- Information for staff should be comprehensive, timely, concise and in plain English
- Where there are limits or boundaries to involvement, we need to be clear about these from the outset and manage expectations about who can be involved, how to be involved and what is possible within constraints
- The involvement process should be as easy and time/resource efficient as possible whilst also allowing staff time to contribute

Staff are actively involved in making decisions about quality of delivery, planning and proposals for change through:

- Team meetings
- Appraisals and 1-2-1 meetings
- SAR and COSAR processes

Feedback

Staff give their opinions and ideas, which can influence decisions, but are not actively involved in the decision-making process.

- Staff Survey
- Tutor Forums

Information

Staff are informed of issues and decisions via:

- All Staff Briefings
- Weekly communication e.g. memo
- Staff News
- Email
- Minutes of meetings

1.10.13 Data Protection Policy / Statement and Privacy Notice

College of Companion Animal Studies (CCAS)(“the College”) abides by the Data Protection Act 1998 and, from 25 May 2018, under the General Data Protection Regulation (GDPR).

The College needs to keep certain information about employees, learners and other users to allow it to monitor performance, achievements, and health and safety, for example. It is also necessary to process information so that staff can be recruited and paid, courses organised and legal obligations to funding bodies and government complied with. To comply with the law, information must be used fairly, stored safely and not disclosed to any other person unlawfully. To do this, the College must comply with the Data Protection Principles which are set out in the Data Protection Act 1998 and, from 25 May 2018, the General Data Protection Regulation (hereafter referred to as the GDPR).

2. The Types of Information Covered by Data Protection Legislation

Personal Data, Data Protection legislation applies to personal information relating to a living person. It applies not only to computerised or automated personal data, but also to information held in manual filing systems. Included are such items of information as name, date of birth, contact details, title and gender, but also less obviously personal data such as IP addresses, online identifiers

and pseudonyms. The legislation also applies to any records where an individual can be directly or indirectly identified from the information present, even where the name is not included.

Sensitive Personal Data Also known as **Special Category Data**, this is the subset of **Personal Data** where the data items are especially sensitive and need a greater level of protection. These include ethnic origin, health data, religion, sexual orientation, and biometric information.

3. The College's Responsibilities

Under the Data Protection Act and the GDPR, the data protection principles set out the main responsibilities for the College. These require that data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- d) accurate and, where necessary, kept up to date
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing

The College must have a lawful basis for processing any personal information, and must make this clear in the privacy notice.

The majority of subject access requests will be dealt with through individual Data Officers.

4. The Rights of Individuals Whose Data is Processed by the College

- The right to be informed The College is obliged to provide fair processing information, and does so through its privacy notices.
- The right of access Individuals have the right to access their personal data, and this access will be provided as quickly as possible – we are legally bound to provide the data within one calendar month. This data will usually be provided free of charge, with the only exceptions being where the request is found to be unfounded, excessive or repetitive.

To access your personal data or to contact the College about other matters covered by this Policy, please write to, email or phone the Data Protection Officer at:

Data Protection Officer email: enquiriesccas@outlook.com

3. The right to rectification Individuals are entitled to have personal data rectified if it is inaccurate or incomplete.

4. The right to erasure an individual is entitled to request the deletion or removal of personal data where there is no compelling reason for its continued processing. It should be noted that the College is legally obliged to process and retain much of the personal information it holds.

5. The right to restrict processing Individuals have the right to restrict the College from processing certain aspects of their personal data if one of the following circumstances applies:

- The accuracy of the data is contested
- The individual objects to the processing of the data in principle
- The College's processing of the data is unlawful ²
- The College wishes to delete the data, but the individual has need of the data for legal purposes

6. The right to data portability Individuals may request an electronic copy of their personal data to use for their own purposes. The College will make every effort to provide the data in a form that is useable and acceptable to the individual, and this will be done without charge.

7. The right to object Individuals have the right to object to: ² Direct marketing – the College will stop processing for this purpose on receipt of an objection. ² Data processing for research or statistics – the College will engage with the individual to come to an agreement within the law.

Data processing in the College's legitimate interests - the College will engage with the individual to come to an agreement within the law.

8. Rights in relation to automated decision making and profiling Individuals who have any concerns about automated or computerised decision making should refer them to the Data Protection Officer.

9. Responsibilities of Staff

To ensure that any information that they provide to the College in connection with their employment is accurate and up to date.

To inform the College of any change to information which they have provided.

To check the information that the college will send out from time to time, giving details of information kept and processed about staff, and change any information that is incorrect or incomplete.

To comply with the guidelines for data collection and processing when, as part of their responsibilities, they collect information about other people, (for example learners' course work, opinions about ability, references to other academic institutions, or details of personal circumstances).

10. Responsibilities of Learners

To ensure that all personal data provided to the College is accurate and up to date.

To ensure that changes of address, next of kin etc. are notified to the College, preferably via the Learner Portal, but alternatively via Student Admin and/or their Course Tutor.

To ensure that they keep their passwords to College networks and systems secret and secure.

To report to the College's IT Services team if they suspect their account security has been breached.

11. Data Security

In order to ensure the security of personal information, IT Services will:

maintain a high level of security guarding the College's network and systems

require a change of network password for staff every 90 days

wipe hard drives and memory of all equipment before disposal

In order to ensure the security of personal information, staff are required to:

lock their IT device using -L or [Ctrl]-[Alt]-[Delete], then [Enter] when leaving their PC/Surface/Laptop unattended

keep their passwords secret

avoid opening emails on a projected screen – private information may be displayed to anyone else in the room or even outside via the window

when emailing personal data, password protect in an attachment and phone the password through to a trusted number

refer all requests for disclosure of personal data from external sources to be dealt with via the central register

check the email addresses of intended recipients before sending any email, as email programs often incorrectly predict email addresses you are typing in

consider using BCC to restrict visibility of other recipients' addresses when emailing to a group of recipients (especially where there are large numbers of recipients or some external addresses).

Where the College processes data on behalf of other organisations, e.g. conducting external DBS checks, it will comply to ICO requirements.

12. Loss or Theft of Personal Information

All incidences of loss or theft of personal information must be reported immediately to the College's Data Protection Officer (the Director of Information and Funding). A data or IT security incident relating to breaches of security and/or confidentiality could range from computer users sharing passwords, to the loss or theft of personal information either inside or outside the College.

A security incident is any event that has resulted or could result in:

The disclosure of personal/sensitive/confidential information to any unauthorised person.

The integrity of the system or data being put at risk.

Threat to personal safety or privacy.

Legal obligation or penalty.

All incidents must be reported to the Data Protection Officer in the first instance, as soon as possible after the event.

In the case of a potential breach, the Data Protection Officer will instigate an investigation into the incident and will decide whether it needs to be reported to any regulatory bodies, in particular the Information Commissioner's Office (ICO). If a breach has occurred, the ICO will be informed within 72 hours of the incident, and if appropriate all data subjects concerned will also be contacted and informed. If possible, the offending paperwork, data or communication will be retrieved as soon as possible. The Data Protection Officer will retain a central register of all such incidents occurring within the College, whether or not they resulted in a breach.

The following is a list of examples of breaches of security and breaches of confidentiality. It is neither exclusive nor exhaustive and should be used as a guide only. If there is any doubt as to what constitutes an incident, you should consult the Data Protection Officer who will decide what action should be taken.

Examples of a breach of confidentiality:

Finding confidential/personal information either in hard copy or on a portable media device outside College premises or in any of the College's unsecured common areas.

Finding any records about a staff member, student, or applicant in any location outside the College's premises.

Passing information to unauthorised people either verbally, in writing or electronically.

13. Subject Consent

In many cases, the College can only process personal data with the consent of the Individual. In some cases, if the data is sensitive, express consent must be obtained. Agreement to the College processing some specified classes of personal data is a condition of acceptance of a learner onto any course, and a condition of employment for staff. This includes information about previous unspent criminal convictions (all convictions in the case of staff).

Therefore, all prospective staff and learners will be asked to sign a Consent to Process form, regarding particular types of information when an offer of employment or a course place is made. A refusal to sign such a form can result in the offer being withdrawn.

14. How long to keep records:

Record type	Length of time kept	Amendments/reasoning
Qualification records	6 years post qualification and/or certification	N/A
Learner assessments, declarations, relating IQA work etc	1 years post certification	This may be extended if there is a delay in EQA activity but details will be destroyed thereafter.
Learner personal records	3 years post qualification Security question details: 6 years post qualification certification	To be able to answer security question in relation to qualification request.
Learner records in the circumstance of withdrawal/failed application	1 year post application/withdrawal	This may be extended is there is a dispute of any kind.
Assessment site details and agreements	3 years post final use of assessment site	This may be extended is there is a dispute of any kind.
Staff personal records	6 years post staff employment	
Staff Assessment/IQA records	6 years post learner qualification certification	

15. Conclusion

Compliance with the 1998 Data Protection Act, and from 25th May 2018 the GDPR, is the responsibility of all members of the College. Any deliberate breach of the Data Protection Policy may lead to disciplinary action being taken, or access to College facilities being withdrawn, or even a criminal prosecution. Any questions or concerns about the interpretation or operation of the policy should be taken up with the Data Protection Officer.

[Confidentiality/GDPR](#)

[Guidance for student work](#)

College of Companion Animal Studies (CCAS) needs to abide by the Data protection and GDPR policy May 2019.

This means that when you are using patient/client notes or details of situations that you ensure all personal information is removed from all assignments and online work/assessments.

Assignments: All students are required to remove all client/patient identification details. Removal by overwriting is not always effective and therefore electronic removal is required.

Online portfolio (OP): Students must not identify the client/patients identity in the OP. A code should be used such as a client code or reference number and if necessary a copy of the clients details relating to this code/number should be kept in the evidence file. This is to ensure that sampling can take place by the internal quality assurer.

Any work produced that does not meet the above will be returned for amending.

Any client details kept in the evidence file should be disposed of in a confidential manner 2 years following the completion of your course.

Student Name _____

Course _____

Examination _____

Date _____ Signature _____

Invigilator name _____

1.10.14 Policy / Statement on working with Partners (where applicable)

CCAS will not be working with partners but will be hiring facilities such as hydrotherapy suites, teaching classrooms and livestock.

Contracts of use will be drawn up to support the longevity of the agreement and to ensure that learners always have access to the suitable environment to learn.

1.10.14 Conflict of interest policy

Conflicts of interest may arise where an individual's personal or family interests and/or loyalties conflict with those of the College.

These interests may be academic, financial or emotional. Such conflicts may create problems, as they can:

- inhibit free discussion
- result in decisions, or actions, that are not in the best interests of the College
- risk the impression that the College has acted improperly.

The aim of this policy is to protect the College and the individuals concerned from any appearance of impropriety.

Contracts and Agreements:

Staff have an obligation to disclose in writing to a responsible person associated with the contract or agreement that they believe that a conflict of interest does or could exist in respect of their involvement in the contract or agreement. If a staff member who is negotiating an agreement on behalf of the College has an interest such that it could appear to a reasonable observer that negotiations are biased, the staff member should disclose that interest.

Management and Supervisory Roles:

Staff members who hold a line management or supervisory role have an obligation to make a disclosure in all cases where they find themselves involved in:

- (a) the recruitment, selection, or appointment of an applicant; or
- (b) the appraisal, promotion, discipline, or other management activity of a staff member; or
- (c) the authorisation of any financial payments (e.g. timesheets, expenses claims, salary changes) for a staff member with whom they have a personal relationship, or who is known to them privately through their commercial interest, or whose known religious/ethical views or strong personal values may be perceived to be in conflict with their own.

Disclosure must be made in all cases .

Academic Relationships:

Academic staff members have an obligation to make a disclosure in all cases where they find themselves involved in the recruitment, progression and assessment of students with whom they have a personal relationship, or who is known to them privately through their commercial interest, or whose known religious/ethical views or strong personal values may be perceived to be in conflict with their own. Disclosure must be made in all cases.

Disclosure of Other Employment:

In specific cases, there may be benefits to both staff and the College for staff to hold other employment simultaneously with their College employment. However, there also exists a potential

for a perceived or real conflict of interest or commitment where more than one employment relationship exists at any particular time.

What to do if a Conflict of Interest arises:

Whenever staff or student has a personal interest in a matter to be discussed at a meeting of the College or in a prospective commercial or financial dealing with an outside body, the individual concerned must, in the case of matters arising at meetings:

- declare an interest at or before discussion begins on the matter
- withdraw from the meeting for that item unless expressly invited to remain in order to provide information
- not be counted in the quorum for that part of the meeting;
- Withdraw during the vote and have no vote on the matter.

Penalties for Non-Disclosure of a Conflict of Interest:

- It is an individuals' responsibility to raise concerns relating to conflicts of interest directly with an appropriate person within the College.
- If not sure what to declare, those affected should consult at the earliest possible occasion. If a conflict of interest cannot be resolved by discussion the College will set up a panel to advise the parties.

Failure to disclose an actual or potential conflict of interest could result in dismissal for gross misconduct.

1.10.16 Safeguarding policy

Definition

For the purposes of this document, Safeguarding is defined as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

This definition is taken from the guidance document Working together to Safeguard Children (2018), which focuses on safeguarding. In addition, the Counter-Terrorism and Security Act 2015 contains a duty on specified authorities to have due regard to the need to prevent people from being drawn into extremism/terrorism.

*In the College's context the term 'children' should be taken to include all young people and vulnerable adults.

This policy asserts that the College will have in place inclusive and integrated 'safer' practices that promote and ensure the safety and well-being of all learners, while recognising the importance of having in place procedures and practices in support of groups of learners that are or become vulnerable. The College understands also that extremism may also lead to significant harm and abuse and, in line with the prevent duty, believes that there is an important role for the College in helping people from being drawn into extremist and/or terrorist activities.

The policy provides the framework for promoting and ensuring the safeguarding and protection of all learners at, or associated with, College of Companion Animal Studies (CCAS) The College is committed to safeguarding and aims to create a culture of vigilance.

The College will maintain procedures and practices which safeguard and promote the well-being of all its learners, by identifying and applying best practice within the sector and ensuring that the Learner Safeguarding Policy and Procedures comply with legislative requirements and government recommendations.

Whilst the College will work openly with parents and carers, if it is believed to be in the best interest of the child, it reserves the right to contact Children's Social Care or the police, if appropriate, without notifying the parents.

2.2 Learner Safeguarding Policy Statement

To ensure that comprehensive and effective safeguarding practices exist within the College, and that a culture of adherence to and continuous development of these practices is established and maintained, the College will:

- a) Require all staff to provide and assure a safe environment for learners always;
- b) Establish and maintain procedures and practices which minimise risks to all learners;
- c) Promote the right of every learner of the College to work within a safe and cooperative learning and working environment;
- d) Provide information and educate learners to equip them with an awareness about how to stay safe by promoting safety - including e-safety - in a proactive way;
- e) Maintain recruitment and contracting practices which check the suitability of staff, volunteers and operators of externally contracted services to work with children and vulnerable learners;
- f) Provide training to maintain the awareness of all staff so that they recognise and react responsibly to apparent and potential instances of abuse or neglect of learners;
- g) Articulate and maintain procedures for identifying, investigating and reporting cases (or suspected cases) of abuse or potential for harm to learners;
- h) Designate and train staff as members of the Designated Safeguarding Team, equipping and supporting them to investigate and deal appropriately with incidents and allegations of abuse or neglect of learners;

- i) Collaborate and cooperate with external agencies to establish, maintain and coordinate procedures and arrangements for ensuring the safety of the College's learners, keeping the welfare of the learner at the centre of any action taken;
- j) Consider 'contextual safeguarding' outside of the home environment;

2.3 Monitoring and Review

The College of Companion Animal Studies (CCAS) will monitor the impact of this policy on an annual basis.

3. Guidance for all Staff

3.1 It is the responsibility of everyone within the College to ensure the safety and well-being of our learners.

It is everyone's responsibility to understand how to recognise, respond to, report and record any concerns about the safety and well-being of any learner as appropriate.

All college staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life. In the first instance staff should discuss early help requirements with the directors of College of Companion Animal Studies (CCAS) Staff may be required to support other agencies and professionals in an early help assessment. It is therefore important that all staff are aware of the contents of these guidelines. The guidelines cover the following issues:

- a) Background;
- b) Who and what is covered by this policy and procedures;
- c) Safeguarding learners - definitions of learner/child/vulnerable adult;
- d) Safeguarding learners - definitions of abuse/neglect/harm;
- e) Confidentiality;
- f) Protecting yourself from allegations;
- g) Acronyms used in this document;
- h) Appendix 1 - What to do in the event of an allegation or suspicion of actual or potential abuse/neglect/harm.

a) Background

Education providers of post-16 learning and skills have responsibilities to ensure the safety of children, young people and those adults deemed 'vulnerable'.

The College is committed to the principle and practice of safeguarding learners. The following principles and procedures should be enacted alongside the College's Safeguarding Learner's Policy Statement.

b) Who and what is covered by this policy and procedures

These principles and procedures extend to all learners, all staff, all providers of services to the College, all other users of the College and all College activities.

It is the responsibility of individual members of the College community to adopt the aims and values of these principles and procedures and to ensure that learner safety and well-being is our first responsibility.

The College's commitment to safeguarding learners extends collectively to everyone in the College and all that we do. Procedures and practices developed by College management in these areas should be informed by and comply with the principles and framework set out by the Safeguarding Learner's Policy and Procedures.

The College will take appropriate opportunities in the following areas of its work to publicise and make explicit its commitment to the principles and practice of safeguarding:

- 1) Learners' personal development and tutorial care; via the content of the curriculum and the tutorial system, induction and welcome days. Sparsholt College has a focus on the PREVENT and RESPECT agendas, including a focus on British and College values. In addition, the student induction guide gives all students advice about where to seek support.
- 2) Establishing and promoting College mechanisms for reporting concerns about learner safety and support;
- 3) Access to further individual support for learners;
- 4) Opportunities for enrichment activities;
- 5) Partnerships and collaboration with parents, communities, employers and other agencies;
- 6) Staff recruitment practices;
- 7) Effective Health & Safety policies and learner involvement in raising and discussing Health and Safety issues;
- 8) Staff professional development and training in child and vulnerable adult protection;
- 9) Curriculum and course planning;
- 10) Contracting with external suppliers to provide unsupervised services to learners;
- 11) Appropriately restricting access to specific areas of the College, including residential accommodation, changing facilities, etc;
- 12) Restricting unsupervised access of visitors to areas of College premises that are frequented by learners.

c) Safeguarding learners - definitions of Learner, Child and Vulnerable Adult

Any learner could potentially be the victim of abuse by those known to them or, more rarely, by a stranger, whether that is in a family, an institutional or community setting or by other means, such as via the internet.

These principles and procedures are intended to safeguard all College learners and provide for the College to discharge its legislative obligations to protect learners under the age of 18 years and vulnerable adults. These principles and procedures recognise the following definitions regarding the individual.

Learner – the term 'learner' covers learners enrolled with the College who study on one of the College's campuses or at any of the outreach or Work-Based Learning sites. The policy also covers those learners who are on work placement as part of their course.

Child – in accordance with The Children Act 1989 (and in the Children Act 2004), and therefore in accordance with the law, the College shall regard any young person below the age of 18 as a child.

Young people aged 18 + - may in some circumstances be regarded as vulnerable because of earlier life-experience and may therefore fall within the remit of The Children Act 1989. The College will act based on individual situations; for example, where a learner is over 18 but wishes to report abuse which took place when they were younger or if there are younger siblings in a family who are thought to be at risk.

Vulnerable Adult – is defined as a person 'who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation' (Department of Health, 2000).

Vulnerability can apply to a wide range of disabilities and situations including those adults at risk owing to their caring role or family responsibilities. Vulnerability may be temporary or permanent. Individuals can become vulnerable when no previous conditions existed, for example if they become ill.

A vulnerable adult may be a person who, for example:

- 1) Has learning disabilities
- 2) Suffers from mental illness
- 3) Has physical disability
- 4) Is a substance mis-user
- 5) Is homeless
- 6) Is in an abusive relationship
- 7) Becomes ill or otherwise vulnerable
- 8) Is a previously looked after child

d) Safeguarding learners - definitions of abuse/neglect/harm

A learner may be abused or neglected by having harm inflicted upon them by a person failing to act to prevent harm. The College recognises the following definitions about abuse, neglect and harm.

What is abuse and neglect? Definitions A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

Emotional abuse: The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual abuse: Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Child sexual exploitation is a form of child sexual abuse. "Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual appears consensual. Child exploitation does not always involve physical contact; it can also occur through the use of technology." DfE February (2017)

Peer on Peer abuse – This can take different forms, such as sexual violence and sexual harassment (between two children or group of children of any age and sex), physical abuse such as hitting, kicking or shaking, sexting or initiation type violence or rituals. This can take place in person, on line or via a mobile phone (via texting). The College has a zero tolerance of all peer-on-peer abuse.

Physical abuse: Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Neglect: The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: a. provide adequate food, clothing and shelter (including exclusion from home or abandonment) b. protect a child from physical and emotional harm or danger c. ensure adequate supervision (including the use of inadequate care-givers)

d. ensure access to appropriate medical care or treatment It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Child protection plans may be recorded under any of the above categories.

Domestic Abuse In Hampshire, the Safeguarding Children Board has determined the worth of recording when the main risk to children arises from the threat or presence of domestic abuse. One of the four categories of Child Protection Plan below will be used in circumstances when the conference judges that without the presence of domestic abuse the threshold for a Child Protection Plan would not be met. Domestic Abuse: Emotional – Domestic Abuse: Sexual – Domestic Abuse: Physical – Domestic Abuse: Neglect

e) Other things to consider are:

Radicalisation – is the process whereby people are drawn into terrorist-related activity. The College will collaborate with all statutory partners, the police and the local community to identify individuals at risk of being drawn into any form of extremism; assess the nature and extent of that risk; and develop the most appropriate support plan for the individuals concerned. The College will adhere to the Counter Terrorism and Security Act (2015) Prevent Duty and therefore aim to intervene early to protect and divert people away from the risks they may potentially face before illegality occurs. The College will challenge any ideology that supports extremism and/or terrorism to protect vulnerable individuals.

See: <http://www.homeoffice.gov.uk/publications/counter-terrorism/prevent/prevent-strategy> and <http://www.homeoffice.gov.uk/publications/counter-terrorism/counter-terrorism-strategy>

In the first instance any disclosures, allegations or concerns regarding the above, related to an individual 'child' or 'vulnerable adult', should be reported to the DSL or DDSL who will act appropriately. Channel Panel - Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people. A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary, and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.

Female Genital Mutilation - Whilst all staff should speak to the designated safeguarding lead (or deputy) regarding any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, during their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

“Honour-based” Violence- is a violent crime or incident which may have been committed to protect or defend the ‘honour’ of a family or community. It is often linked to family or community members who believe someone has brought shame to their family or community by doing something that is not in keeping with their expectations. Women and girls are the most common victims of “honour based” violence however it can also affect men and boys. It is important that, if “honour based” violence is known or suspected, communities and family members are NOT spoken to prior to referral to the police or social care as this could increase the risk to the young person.

County Lines - a ‘county line’ describes a situation where an individual, or more frequently a group, establishes and operates a telephone number in an area outside of their normal locality to sell drugs directly to users at street level. This generally involves a group from an urban area expanding their operations by crossing one or more police force boundaries to more rural areas, setting up a secure base and using runners to conduct day to day dealing. Young people are vulnerable to being ‘victims’ of this crime. For more information on this see <http://www.nationalcrimeagency.gov.uk/publications/620-NCA-Intelligence-Assessment-CountyLines-Gangs-and-Safeguarding/file>

Young people with Special Education needs Students with SEN are likely to be more vulnerable to all variations of abuse, staff need to be vigilant to automatically assume that behaviours such as withdrawal and sexualised or violent behaviour as a symptom of the SEN, especially if it is out of the ordinary for an individual.

f) Confidentiality

Young people aged 16-18 have rights to confidentiality which should be respected. Confidentiality is an essential part of the relationship between professionals and young people. All communications about cases should be kept to a minimum and on a “need to know” basis. This should not stop a member of staff reporting concerns.

It may be that an individual discloses abuse to a member of staff and does not wish the information to go any further. However, if the member of staff considers that the young person/vulnerable adult (or another minor/vulnerable adult) continues to be at risk, especially where this risk is significant, confidentiality must be breached, though the member of staff must clearly explain why the law and regulation mean this breach is necessary.

The law recognises that disclosure of confidential information without consent may be justified in the public interest to prevent harm to others. This same restriction with regards to gaining consent also applies in cases concerning potential extremism or radicalisation. The College will undertake to restrict to a minimum the number of people informed, whilst complying with its statutory duties.

g) Protecting yourself (staff) from allegations:

- Do not under any circumstances give your personal details to a student.
- Never communicate with a student using your personal Facebook or social media site.
- When conducting a 1-1 meeting with a student, try to ensure you are in a room with a glass door where other staff can see you or (preferred option) in a room shared by other staff. If this is not possible, make sure a colleague knows where you are and ask them to call in at a specific point.
- You should not use your car (or College vehicle) to transport a lone student. If in your professional judgement there is a clear duty of care to transport a lone student, you may do so, but only after you have sought permission of a supervisor or line manager and ideally with permission of parents if they are under 18 years old.
- Do not physically touch*/comfort a student and if they initiate physical contact for whatever reason (recognising that some students with SLDD may do this habitually through showing affection or as a means of communicating) then break away from this as soon as you are able and make a file note.

h) Acronyms and Specialist terms used in this document

1. CEOP – Child Exploitation & Online Protection Centre
2. DBS - Disclosing & Barring Service
3. DSL – Designated Safeguarding Lead
4. DDSL – Deputy Designated Safeguarding Lead

APPENDIX 1 - What to do in the event of an allegation or suspicion of actual or potential abuse/neglect/harm

4.1 The College recognises that people who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The welfare of the individual is paramount.

If a learner discloses significant personal problems to a member of staff, their disclosure should be acknowledged and taken seriously. Staff should: Stay calm and contact your DSL/DDSL at the earliest opportunity and inform them of the disclosure so that they can follow up as appropriate.

In exceptional circumstances (where the DSL/DDSL is not available):

- a) Believe what is being said;
- b) Allow time to listen carefully - do not ask unnecessary questions;
- c) Reassure the learner that it is important to tell you;
- d) Do not appear shocked or make judgments about what is being said;
- e) Do explain to the learner that you may have a legal obligation to pass this information on, to protect both them and possibly other members of the family and the public;

f) Do write down the details - if appropriate ask the learner to write it down, using their own words as much as possible; When the notes are complete, sign your name (and date it) immediately beneath the last line of text. Ask the learner to sign their name too.

g) Do be alert to the possibility and note details, if you become aware that there could be other children and/or vulnerable adults living in the same house as the disclosing learner and who may also be exposed to risk;

h) Do contact one of the College DSL's/DDSL's at the earliest opportunity. Pass on to the DSL/DDSL all your records and notes – do not keep copies of your notes;

i) Do treat the information you have received with the strictest confidence. The DSL/DDSL will be responsible for deciding what further action should be taken;

j) Don't make promises you cannot keep nor any that are not within your gift to make;

k) Don't promise confidentiality

l) Ultimately, all staff have the right to make a referral directly to the police or children's services and should do this if, for whatever reason, there are difficulties following the agreed protocols, e.g. they are the only adult on the college premises at the time, are unable to contact our out of hours' team, are on a residential trip or have serious concerns about sending a student home.

If any member of staff has reason to suspect that abuse or neglect of a learner may be happening, or that any learner is at risk of significant harm, they must discuss their concerns as soon as possible with a member of the College DST. `

If any member of staff feels unduly distressed because of receiving a disclosure from a learner, support is available through HR.

4.1 The College will seek to be excellent in relation to safeguarding in recruitment and training by:

a) Ensuring there are standard questions about safeguarding in all interviews;

b) Making all appointments subject to satisfactory checks by the Disclosing & Barring Service (DBS);

c) Engaging all volunteers subject to DBS checks;

d) Include training on safeguarding issues, and how to recognise, respond, record and report issues of concern relating to learners, as part of staff induction;

e) Providing Designated Safeguarding Leads with specialist training which will be refreshed every two years;

f) All other staff will refresh their training every three years, or earlier should there be a change to legislation or process.

4.2 The College will pay for DBS and barring checks for all new staff.

5.1 Checks that will be undertaken

In accordance with the Protection of Freedoms Act all regular paid roles within the organisation, are classified as regulated activity and as such are subject to the following checks:

- a) Identity;
- b) DBS check (enhanced); including barring list checks
- c) Right to Work in UK;
- d) Qualifications appropriate to role;
- e) Professional status as appropriate;
- f) Health & sickness record
- g) Previous employment history

A role is classed as Regulated Activity only if done regularly. Regular means carried out by the same person frequently (once a week or more often), or on 4 or more days in a 30-day period.

5.2 Professional and character references

Staff are not permitted to begin their employment (or take up residence) until the DBS and barring check has been completed. In exceptional circumstances where the DBS check is yet to be returned, the appointment may begin subject to a rigorous risk assessment and on the permission of the Principal or Deputy Principal until a clear DBS and barring check is received.

It is the responsibility of the College of Companion Animal Studies (CCAS) to ensure that all staff employed at the College (directly or through an agency) and all adults living on site have a satisfactory DBS disclosure at the appropriate level.

References will be sought where possible before interview and should be from the most recent employer and at least one other employer. Where this is not possible the College will seek references from organisations or individuals who will understand the potential for the applicant to work safely with young people and vulnerable adults and the individual's honesty and integrity.

5.3 Training in safeguarding and child protection

All new staff will be made aware of the Safeguarding Learners Policy and Procedures during their induction. The member of staff's understanding of their responsibility for safeguarding will also be explored. This policy will be made available to all staff on the Policy document library on the College Intranet.

All staff working at the College will undertake the Safeguarding in FE e-learning module during their initial induction period, which will be no longer than 5 days. Refresher training will be undertaken at least every 3 years.

Staff involved in the recruitment and appointment of staff will have refresher training every two years.

6.1 In making its commitments to safeguarding learners, the College recognises that its practices are also bound by a broad framework of legislation, and statutory or national guidance including:

- a) The Children Act 1989
- b) Local Safeguarding Children Board guidance
- c) UN convention on rights of the child
- d) GDPR (2018) e) Human Rights Act 1998
- f) Employment Protection Act 1975
- g) Employment Relation Act 1999 *Safeguarding Children in Education
- h) Protection from Harassment Act 1997
- i) Special Educational Needs and Disability Act 2001
- j) Safer Recruitment 2015
- k) Forced Marriage (Civil Protection) Act 2007
- l) The Safeguarding Vulnerable Groups Act 2006
- m) Equality Act 2010
- n) Keeping Children Safe in Education (DfE 2018)
- o) Working Together to Safeguard Children (2018)
- p) The Counter-Terrorism and Security Act 2015
- q) Sexual Violence & Sexual Harassment between Children in Schools and Colleges (2017)

Safeguarding officer: James Bidwell