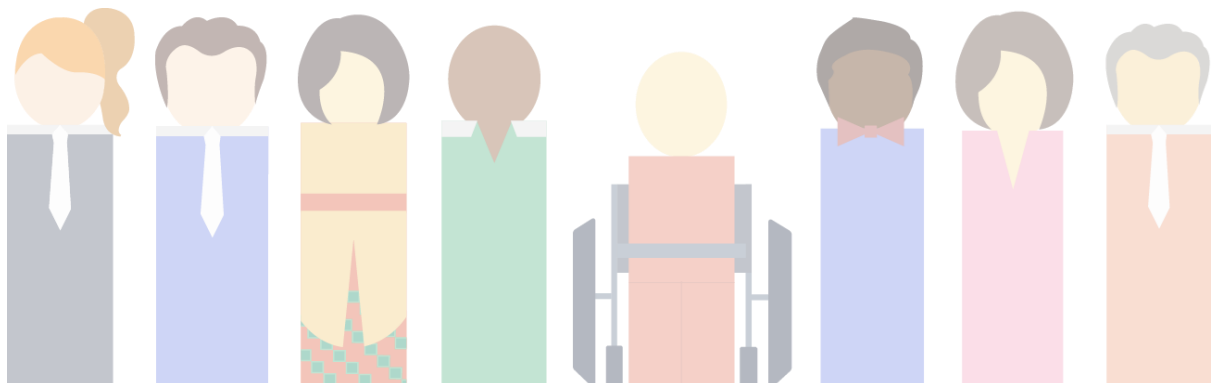




Nine Dots Development
Learn Today, Lead Tomorrow.

Apprenticeship Policies

V7 May 2024



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Safeguarding Policy and Procedures

Introduction to the Policy

Nine Dots Development (**NDD**) is fully committed to the safety and welfare of its staff, learners, and stakeholders whether children, adults, or vulnerable people. Therefore, NDD is committed to providing a safe environment in all senses, free from harm or abuse of any kind and NDD staff are expected to share this commitment fully, in that all learners have the right to protection against abuse or harm.

While the demographic of **NDD's** learners are employer work-based adults, this policy outlines **NDD's** commitment to safeguarding and promoting the welfare of children, vulnerable young people, and vulnerable adults in line with current best practice and legislation. In line with the Education Act 2002, a child or vulnerable young person is, 'anyone who has not yet reached their 18th birthday ...'. The definition of Vulnerable adult is anyone aged over 18 person "who is in need of care and support", "who is unable to keep themselves safe because of their care and support needs or unable to protect themselves from exploitation".

For the purposes of this document: the term 'learners' includes children, vulnerable young adults, young people and adults within the broader definition of safeguarding. Additionally, the term 'staff' includes directors, employees, temporary staff, and associates.

Definitions

Safeguarding and protection are two, linked, but ultimately different interventions:

- Safeguarding – applies to all work organisations with Apprentices, who have a duty to provide a safe, positive, and friendly environment for its learners. It means actively seeking to involve everyone in keeping learners safe and promoting their welfare. Prevention is a key principle of Safeguarding and is the responsibility of everyone to carry out.
- Protection – Is the process of protecting individual learners identified as either suffering or at risk of suffering significant harm because of abuse or neglect. Protection refers to the procedures that are used when there is a particular incident or concern. Protection is a statutory responsibility, focussing on abuse or neglect.
- Harm and Abuse are defined as follows:
 - Abuse and Neglect – An individual may abuse a child/vulnerable adult by inflicting harm or failing to act in order to prevent harm. This abuse can come from an individual or a group, consisting of adults, other children, or vulnerable



adults. Abuse can occur in a family, social or institutional setting by people known or unknown to the victim.

- Harm – Ill treatment[^] or impairment of an individual's health and development*. This can also include impairment derived from witnessing the mistreatment of others.

*Development – includes physical, emotional, intellectual, social, or behavioural aspects of an individual's development.

[^]Ill Treatment – includes physical, sexual and all other forms of ill treatment that are non-physical.

- Honour-based Violence – a violent incident or crime which may have been carried out to protect or defend the honour of a family or community.
- Female Genital Mutilation – Safety from sexual exploitation, FGM and forced marriage.
- Vulnerable young adult sexual exploitation – Children and vulnerable young adults in exploitative relationships and situations, receiving gifts, money, or other rewards for performing sexual activities or having others perform sexual activities on them.

Categories of Abuse

NDD recognises the need to safeguard and protect our staff and learners from the following:

- Emotional Abuse – The ongoing emotional maltreatment of a child or vulnerable adult. This can involve deliberately trying to frighten or humiliate an individual or isolating or ignoring them. It may also include having age or developmentally inappropriate expectations imposed on them. It may also include witnessing the maltreatment or harm of others. This category of abuse may involve other forms of abuse or it may occur alone.
- Physical Abuse – The deliberate hurting of a child or vulnerable adult causing injuries such as bruises, broken bones, burns or cuts. This can involve hitting, shaking, burning, scalding, drowning, suffocating or otherwise causing physical harm to the individual.
- Sexual Abuse and Child/Vulnerable Young Adult Sexual Exploitation – A form of sexual abuse, including children and vulnerable young adults in exploitative relationships and situations, performing sexual activities, or having others performing sexual activities on them, receiving gifts, money, or affection in return. Children or vulnerable young adults may be tricked into believing that they are in a consensual relationship, given drugs or alcohol and be exploited online or even trafficked within the UK for the



purposes of sexual exploitation. Sexual exploitation of children and vulnerable young adults can also occur within gangs. The viewing, creation, or showing of pornographic or explicit material as well as other non-contact ways such as encouraging individuals to behave in sexually inappropriate ways also constitutes sexual exploitation.

- Neglect – the ongoing failure to meet a child or vulnerable young adult’s basic needs. This may include the individual being left hungry or dirty, without shelter, inadequate clothing, health care or supervision. Neglect can also occur during pregnancy as a result of maternal substance abuse.
- Radicalisation - the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

This list is not a definitive and other types of abuse and harm can also be covered by a safeguarding response.

Purpose of the Safeguarding Policy

This policy exists to ultimately provide a framework for protecting any individual or group from abuse of any kind; this includes children, vulnerable young adults, adults, staff, learners, and external stakeholders.

NDD has a responsibility to:

- Ensure staff are appropriately recruited and trained to understand their safeguarding responsibilities. This includes ensuring that staff understand they are ultimately responsible for their own actions and behaviour, and to avoid any behaviour that might lead a reasonable person to question their intentions.
- Take appropriate action to make safe any children or vulnerable young adults who are suffering or likely to suffer harm.
- Ensure all procedures are up to date and comply with best practice and current legislation.
- Define a process for dealing with allegations made against members of staff.
- Ensure a safe, positive, and effective learning environment for all learners and staff.



Creating a Safe Environment

NDD endeavours in all its dealings to create and maintain a safe, supportive and effective environment for its learners and its staff.

NDD understands that some learners, especially children and vulnerable young adults, may be particularly at risk of abuse. Those individuals that are at significant risk of abuse may struggle in a learning environment and exhibit challenging behaviour as a result of their abuse or low sense of self. Children and vulnerable young adults may be victims and perpetrators of abuse and the two are not mutually exclusive.

NDD will support its learners through:

- Ensuring that they know who they can approach at **NDD** for support or to disclose information.
- Liaising with other agencies that support the learner.
- Ensure that all learners understand what is and what is not acceptable behaviour.
- Ensure all learners feel valued and understand that some behaviour is not acceptable and not their fault.
- Provide opportunities for learners to disclose concerns during the course of learning programmes.
- Ensuring **NDD** staff are well trained and vigilant of safeguarding issues.
- Ensure **NDD** Safeguarding Policies and Procedures are widely publicised.
- Ensure that learners and staff are aware of acceptable behaviour in relation to the use of IT systems.
- Confidential storage of written and electronic records particularly in relation to safeguarding reports, disclosures, referrals and sensitive data.
- Follow relevant procedure where an allegation is made against **NDD** staff.
- Develop links with and notify relevant agencies of unexplained absences of more than 2 days where a child or vulnerable adult is subject to a protection plan, as well as attending a case conference where necessary.
- Ensuring that safer staff recruitment processes are in place for applicable roles.



Designated Safeguarding Officer

The Designated Safeguarding Officer (DSO) for NDD is Dianne Brocklehurst, who can be contacted via email diannebrocklehurst@ninedotsdevelopment.com or phone 07747 615 923.

The Deputy DSO is Andy Hallam who is responsible in the absence of Dianne Brocklehurst. His contact details are: andyhallam@ninedotsdevelopment.com or phone 07826 619 610.

The DSO is responsible for:

- Ensuring that all staff undertake annual Safeguarding and Prevent training and relevant **CPD** activities.
- Raising awareness about the role and responsibilities of **NDD** in relation to protecting learners from abuse, radicalisation, and involvement in terrorism.
- Acting as first point of contact for cases relating to protecting learners from abuse, radicalisation or involvement in terrorism.
- Ensuring that staff and learners are aware of the process to report any Safeguarding and Prevent issues
- Maintaining and applying a good level of understanding of the relevant guidance in place to protect learners from abuse. To protect them from becoming involved in terrorism. To protect them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism and sharing any relevant additional information in a timely manner.
- Referring cases of Prevent and Safeguarding to the relevant Local Prevent Leads or Local Safeguarding boards
- Collating relevant information from, and in relation to, referrals of vulnerable learners.
- Radicalisation - A definition of radicalisation is included in this policy above (P7). **NDD** will consider all matters connected to the issue of radicalisation or potential radicalisation to be a safeguarding concern and they will be reported, recorded, and dealt with in accordance with other safeguarding reports as described in this policy. In doing so **NDD** will seek the advice and support of the Dept for Education's (DfE) network of Regional HE/FE Prevent Coordinators.
Upon receipt of a safeguarding report which may relate to an issue of radicalisation the **DSO** will consider whether external support is beneficial and appropriate. If external support is elected, then the **DSO** may seek initial advice from the DfE Coordinator, Sam



Slack and will utilise the Prevent network to facilitate referrals throughout England and Wales.

Staff Behavioural Standards

To protect the safety and well-being of learners, staff must:

- Be trained and capable of recognising and reporting safeguarding concerns. This includes keeping written records of concerns and keeping these records securely and separate from main learner records.
- Ensure that safeguarding concerns are dealt with appropriately in a timely fashion.
- Be always open and transparent in their working, particularly in their work with learners.
- Not engage in behaviour that would lead any reasonable person to question their intentions.
- Follow safe staff recruitment practices.
- Seek and take advice from the **DSO** over any incident which may give rise for concern.
- Understand information and data sharing policies.
- Be aware that breaches of the law and professional conduct can lead to criminal or disciplinary action taken against them.



Staff are strictly prohibited from the following actions / behaviours:

- Making sexually explicit or suggestive comments to or within earshot of any learner.
- Allow or engage in inappropriate, indecent, or unprofessional touching of any kind.
- Engage in a personal relationship with a learner that would be inappropriate for a normal trainer/learner relationship.
- Take a child or vulnerable young adult or young person to the toilet unless another authorised adult is present or has been made aware.
- Restrain a learner physically unless the restraint is to prevent physical injury of the learner or other individual. In all cases the restraint must be appropriate and reasonable. Should it be deemed inappropriate, the action may be defined as assault.
- Spend time alone with a child or vulnerable young adult on their own, outside of a normal classroom or tutorial environment. If this does occur, staff must ensure that they are clearly visible to others and remedy the situation immediately.
- Engage in social media with learners including accepting friendship requests from learners unless this is specifically approved as part of a learning activity i.e., WhatsApp group to share learning materials/ideas or for trips etc.
- Have a child or vulnerable young person alone in their vehicle. In exceptional circumstances requiring the transportation of a child or vulnerable young adult, another member of staff must be in the vehicle and the matter should be reported to the **DSO** immediately. Staff must also ensure that they have adequate vehicle insurance to cover the transportation of a child or vulnerable young adult as part of their work.

Staff who fall short of the required behavioural standards may be subject to the provisions of the **NDD Disciplinary Procedures**. Any allegations against members of staff will be investigated as per the process laid out in this document.



Allegations Against Staff

NDD recognises that the majority of staff who work with learners act professionally and aim to provide a safe environment, but that on occasion, misunderstandings can occur which can lead to unfounded allegations. Allegations against staff can sometimes be misplaced or even malicious as a result of different interpretations of the same event. Nonetheless, all allegations must be investigated fully and impartially.

On the other hand, some allegations will be genuine, and some people will deliberately seek to abuse children and vulnerable young people. It is therefore essential that **NDD** take all steps appropriate to safeguarding learners and staff, regardless of their role within the company.

All allegations raised against members of staff are treated seriously and **NDD** investigates them immediately and involves all relevant agencies such as Social Services, the Local Authority Designated Officer and/or the Police depending on the seriousness of the allegation.

NDD's first duty is to our learners, and for this reason, any allegation made against a member of staff or any concerns about inappropriate behaviour by our staff will result in a quick response and appropriate action if the allegation is upheld.



Staff Dealing with Disclosures

Staff can contact the **DSO**, or in her absence the **DDSO**, via phone, email or to the email box safeguardingandprevent@ninedotsdevelopment.com about any safeguarding query they have. The **DSO/DDSO** will log the query and decide on an appropriate course of action e.g., signposting or taking the matter further.

For serious incidents and/or where there has been a disclosure, which could come from a number of sources including employers, parents, staff, members of the public or learners themselves, the following process should be followed.

These disclosures will be handled sensitively to ensure the safety and comfort of those coming forward and to ensure the nobody is discouraged from making a disclosure in the future.

Staff should not investigate themselves but instead pass the information on to the **DSO** immediately. Staff will remain calm during a disclosure and listen carefully; staff will not show any emotion towards either the learner or the alleged perpetrator of the abuse. Staff will not trivialise or exaggerate, and will not interrupt, coach, or lead the learner in any way.

Information gathering is critical but must be conducted carefully. Staff will ask enough to clarify their understanding of the situation without making the learner repeat themselves or asking for unnecessary detail. Learners must be made aware that the issue cannot be held in secret and there are reporting procedures but must be assured that the issue will be taken seriously.

Staff will record and keep note of as much detail as possible and provide everything to the **DSO**, Dianne Brocklehurst, using the safeguarding report/referral form (Click [here](#) for the form). Staff must report safeguarding issues immediately or in any case before ceasing duty. Once reported to the **DSO**, it is then the responsibility of the **DSO** to take the matter further, and the reporting member of staff will be made aware of who will be dealing with the referral. Decisions on any further action to take also reside with the **DSO**.

In some instances, staff may have access to highly sensitive and private information relating to the learner. This information must only be used and viewed in a strictly professional context and in line with legislation on data protection as well as internal **NDD** policies. Information must never be used to intimidate, humiliate, or embarrass a learner.

The degree of confidentiality of information will be decided by the **DSO** and will be judged based on how to best protect learners from abuse and harm. **NDD** recognise the need for confidentiality but also the need to protect learners. This should be communicated to the



learner and any other party making a disclosure and under no circumstances should staff promise complete confidentiality.

NDD complies with the requirements of the **Data Protection Act 2018 and GDPR Regulations 2018**, but this does not prevent the sharing of information where this is necessary to protect the safety of a learner.

Learner Referrals

NDD stipulates that if any member of staff suspects that a learner who is under 18 years old is at risk of or is being abused, injured, marked, or bruised in any way in which might raise doubt, they are obliged to report it immediately to the **DSO** using this form (Click [here](#)). This is also a legal obligation.

Even if the member of staff has only heard rumours and has no evidence of abuse, they are still required to report this to the **DSO**, this includes when a child or vulnerable young person has explained certain warning signs, but that explanation seems inconsistent or suspicious.

NDD also stipulates that even if the learner is over the age of 18, these suspicions must still be reported to the **DSO**, so that **NDD** can signpost to the appropriate supporting agencies. In the absence of the **DSO** or **DDSO**, staff should report their suspicions to a Director.

Once a referral is made, the **DSO** will follow **NDD's** detailed procedures on handling Safeguarding referrals, especially in relation to confidentiality.



Safe Recruitment of Staff

NDD's first priority when recruiting members of staff is that they are fit to work with learners, in particular children and vulnerable young people and **NDD** reserves the right to refuse employment to individuals it reasonably believes may pose a risk to its learners.

Some of the key measures in place at NDD to ensure safe recruitment are:

- Checking official documentation in relation to identity, nationality, right to work, residency and role-relevant qualifications
- All new employees require references covering the previous two years of employment. If there is a break in employment then we will go back further until there are two years worth of references.
- A Basic Disclosure and Barring of Employment Service check will be carried out on all new employees with access to learners
 - Where the role requires application of Safer Recruitment Practices e.g., working with learners under regulated activity there will be an Enhanced Disclosure and Barring of Employment Service check and references covering the last 3 years of employment

Key procedures for new and existing staff once recruited to ensure learner safety include:

All staff receive a thorough briefing on the Safeguarding Policy as well as accompanying procedures during their induction, followed by a full safeguarding training session within 12 months.

New employees complete a 6-month probationary period where they are supervised closely both in relation to occupational competence as well as adherence to safeguarding policy and procedures. During or at the end of this 6-month probationary period **NDD may:**

- Confirm the staff members employment.
- Extend the probationary period.
- Dismiss the individual with notice.



Internet, Email and Social Media Usage Policy and Guidelines

Introduction

This policy sets out the obligations and expectations of **NDD** employees, contractors and temporary staff, and **NDD** learners who use the Company's IT facilities.

These facilities are provided to assist with day-to-day work/Apprenticeship programme requirements. It is important that they are used responsibly, are not abused, and that individuals understand the legal, professional, and ethical obligations that apply to them.

NDD explicitly recognises its Prevent Duty under the Counterterrorism and Security Act (2015) to 'have due regard to prevent people from being drawn into terrorism'. NDD is aware of the risks of radicalisation on-line and commits to ensuring all staff with access to learners, understand and are updated on these risks. NDD further commits to making learners aware through this policy, during onboarding, Safety on-line training and on-programme updates.

Support is available from the learner's skills coach, lead trainer or at any time contacting NDDs safeguarding officer, Dianne Brocklehurst.

NDD learners should also understand their Employer's Internet, Email and Social Media Policy and Guidelines

Authorisation

No person is allowed to use Company IT facilities who has not previously been authorised to do so by the Company IT Department or their Line Manager. Unauthorised access to IT facilities is prohibited and may result in either disciplinary action or criminal prosecution.

Legislation

All users shall comply with all current relevant legislation. This includes (but may not be restricted to) the following:

Data Protection Act 2018 / the General Data Protection Regulations (GDPR)

Any personal information on an individual which the Company holds is covered by this legislation. This includes emails too. If you receive a subject access request, you should refer this immediately to your line manager.

Users need to be sure that they are not breaching any data protection rules when they store or use information and when they write and send emails. This could include but is not limited to:



- Using data which has not been kept up to date
- Passing on or processing personal information about an individual without their consent
- Keeping personal information longer than necessary
- Sending personal information outside the country

If any breach of data protection rules is discovered such as the leaking or hacking of personal or sensitive data, this should be reported immediately to your line manager, and any immediate action should be taken to close down such leaks. Your line manager will ensure this is properly investigated and the appropriate reporting actions taken if necessary.

Computer Misuse Act 1990

This Act makes it an offence to try and access any computer system for which authorisation has not been given.

Copyright, Designs and Patents Act 1988

Under this Act it is an offence to copy software without the permission of the owner of the copyright.

Defamation Act 2013

Under this Act it is an offence to publish untrue statements which adversely affect the reputation of a person or group of persons.

Terrorism Act 2006

This Act has makes it a criminal offence to encourage terrorism and/or disseminate terrorist publications.

Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000

This allows for any organisation to monitor or record communications (telephone, internet, email, and fax) for defined business-related purposes.

UK Online Safety Act 2023

The Act requires all companies to take robust action against illegal content and activity. Platforms will be required to implement measures to reduce the risks their services are used



for illegal offending. They will also need to put in place systems for removing illegal content when it does appear.

Responsibilities

All Users are expected to act in a manner that will not cause damage to IT facilities or disrupt IT services. Any accidental damage or disruption must be reported to the IT department or your line manager as soon as possible after the incident has occurred. Users are responsible for any IT activity which is initiated under their username.

Use of the Internet

Use of the internet by employees and learners is encouraged where such use is consistent with their work and with the goals and objectives of **NDD** and the Apprenticeship Programme requirements. Reasonable personal use is permissible subject to the following:

- Users must not participate in any online activities that are likely to bring **NDD** into disrepute, create or transmit material that might be defamatory or incur liability on the part of the Company, or adversely impact on the reputation of the Company.
- Users must not visit, view, or download any material from an internet site which contains illegal or inappropriate material. This includes, but is not limited to, pornography (including child pornography), obscene matter, race hate material, violence condoning messages, criminal skills, terrorism, cults, gambling and illegal drugs.
- Users must not knowingly introduce any form of computer virus into the Company's computer network.
- Personal use of the internet must not cause an increase for significant resource demand, e.g., storage, capacity, speed or degrade system performance.
- Users must not "hack into" unauthorised areas.
- Users must not download commercial software or any copyrighted materials belonging to third parties unless such downloads are covered or permitted under a commercial agreement or other such licence and approved by the Company.
- Users must not use the internet for personal financial gain.
- Users must not use the internet for illegal or criminal activities, such as, but not limited to, software and music piracy, terrorism, fraud, or the sale of illegal drugs.



- Users must not use the internet to send offensive or harassing material to other users.
- Use of the internet for personal reasons (e.g., online banking, shopping, information surfing) must be limited, reasonable and done only during non-work time such as lunchtime.
- Use of gambling sites, online auction sites and other such inappropriate websites is not permissible. If you are in any doubt, you should confirm with your line manager whether a site is permissible or not before accessing the site.
- Staff and learners may face disciplinary action or other sanctions (see below) if they breach this policy.

Use of Email / Instant messaging

Messages sent or received on the Company email / IM system form part of the official records of **NDD**; they are not private property. The Company does not recognise any right of employees to impose restrictions on disclosure of such messages within the Company. These may be disclosed through legal obligations, as part of legal proceedings (e.g., tribunals), and as part of disciplinary proceedings. Users are responsible for all actions relating to their IT account including username and password and should therefore make every effort to ensure no other person has access to their account.

When using Company email / messaging systems, users must:

- ensure they do not disrupt the Company's wider IT systems or cause an increase for significant resource demand in storage, capacity, speed, or system performance e.g., by sending large attachment to a large number of internal recipients.
- ensure they do not harm the Company's reputation, bring it into disrepute, incur liability on the part of the Company, or adversely impact on its image.
- not seek to gain access to restricted areas of the network or other "hacking activities"; this is strictly forbidden.
- not use the system for the creation, retention, or distribution of disruptive or offensive messages, images, materials, or software that include offensive or abusive comments about ethnicity or nationality, gender, disabilities, age, sexual orientation, appearance, religious beliefs and practices, political beliefs, or social background. Employees who receive emails / messages with this content from other employees of the Company should report the matter to their line manager or supervisor.



- not send emails / messages that might reasonably be considered by recipients to be bullying, harassing, abusive, malicious, discriminatory, defamatory, and libelous or contain illegal or offensive material or foul language.
- not upload, download, use, retain, distribute, or disseminate any images, text, materials, or software which might reasonably be considered indecent, obscene, pornographic or illegal.
- not engage in any activity that is likely to
 - Corrupt or destroy other users' data or disrupt the work of other users.
 - Waste staff effort or Company resources or engage in activities that serve to deny service to other users.
 - Be outside of the scope of normal work-related duties – for example, unauthorised selling/advertising of goods and services.
 - Affect or have the potential to affect the performance of, damage or overload the Company system, network, and/or external communications in any way.
 - Be a breach of copyright or license provision with respect to both programs and data, including intellectual property rights.
- not send chain letters or joke emails from a Company account.

Staff who receive improper email from individuals inside or outside the Company, should discuss the matter in the first instance with their line manager or supervisor.

Personal use of a Nine Dots Development email / message account is **not** permitted.

Email Good Practice

The Company has good practice guidelines for dealing with email when staff are out of the office. When activating the "out of office" facility, messages should name an alternative member of staff for correspondents to contact if necessary. This will ensure that any important messages are picked up and dealt with within required timescales.

During periods of absence when highly important emails are anticipated, the employee (or manager) should make arrangements for notification and access by another appropriate member of staff.

Where sensitive and confidential information needs to be sent via email for practical reasons, please be aware that email is essentially a non-confidential means of communication. Emails



can easily be forwarded or archived without the original sender's knowledge. They may be read by persons other than those they are intended for.

Users must exercise due care when writing emails to avoid being rude or unnecessarily terse. Emails sent from the Company may be interpreted by others as Company statements. Users are responsible for ensuring that their content and tone is appropriate. Emails often need to be as formal and business-like as other forms of written correspondence.

Users should delete all unsolicited junk mail, and in the process of archiving emails, users should ensure inappropriate material is not archived.

The Company provides a current and up to date automatic virus checker on all networked computers. However, caution should be used when opening any attachments or emails from unknown senders. Users must best endeavour to ensure that any file downloaded from the internet is done so from a reliable source. It is a disciplinary offence to disable the virus checker. Any concerns about external emails, including files containing attachments, should be discussed with the IT / Line Manager.

Use of Social Media

Employees: Many Nine Dots Development employees will already be using social media in their personal lives. When you are not at work, it is, of course, entirely up to you to decide whether and how you choose to create or participate in a social media space or any other form of online publishing or discussion. This is your own business. The views and opinions you express are your own.

However, if you identify yourself as an employee of the Company or as being associated with it in any way, you must be mindful of this when participating in social media. We have a responsibility to make you aware that, even where you do not intend it, you can harm the company's business and reputation when using social media in a personal capacity, and that breaching this policy outside of work can still result in disciplinary action.

Learners: You are reminded to be respectful of all colleagues and of your professional obligations.

Social media use should be in accordance with your programme requirements only. Where social media is a programme requirement, you should be aware of the following:

- You are not permitted to use social media to cause harm or abuse to others.
- Do not communicate using inappropriate language or references.



- To only use social media in conjunction with legislation related to your age.
- Be aware that social media will be moderated, and further investigation will take place if these guidelines are not followed, or if inappropriate or illegal sites have been accessed or viewed.
- Understand these policies whilst on programme.

Should any concerns be raised as a consequence of internet or social media usage inform your skills coach, trainer, or safeguarding officer.

Legitimate Access to Prohibited Material

There may be circumstances where users feel that the nature of their work means that they are required to access or use material prohibited under this policy. If so, this should be discussed with the Line Manager concerned. The Company is legally responsible for the content and nature of all materials stored on/accessed from its network.

Remote Users

Users may sometimes need to use Company equipment and access the Company network while working remotely, whether from home or while travelling. The standards set out in this document apply to Company employees whether or not Company equipment and resources are being used.

Monitoring

All resources of Nine Dots Development, including computers, tablets, phones, external drives, USB drives, email, voicemail etc. are provided for legitimate use. If there are occasions where it is deemed necessary to examine data beyond that of the normal business activity of the Company then, at any time and without prior notice, the Company maintains the right to scrutinise any systems and inspect and review all data recorded in those systems. This will be undertaken by authorised staff only. This examination helps ensure compliance with internal policies and the law. It supports the performance of internal investigations and assists in the management of information systems.

Penalties for Improper Use

- Withdrawal of facilities
 - Users in breach of these regulations may have access to Company IT facilities restricted or withdrawn
- Employee Disciplinary Action



- Breaches of these regulations may be dealt with under the Company's disciplinary procedures. It may lead to termination of employment from the Company.
- Learner Disciplinary Action
 - Breaches of these regulations may be dealt with under the Learner disciplinary procedures.
- Breaches of the law
 - Where appropriate, breaches of the law will be reported to the police.

Reviewing the Policy

- This policy will be reviewed annually



Equality, Diversity, and Inclusion Policy

Purpose and Process

Aims

Nine Dots Development (NDD) is absolutely committed to ensure equality of opportunity for all. **NDD** celebrates diversity within its own workforce, its clients and suppliers and its learners. **NDD** seeks to ensure that all individuals and groups have equal access to learning opportunities and outcomes, and seeks to treat all employees, learners, and members of the public with respect and dignity.

NDD learners should also understand their Employer's Equality and Diversity Policy and Procedures

NDD seeks to provide an environment and atmosphere free of bullying, harassment, and discrimination both internally and externally. **NDD** seeks to promote positive relationships and dialogue between diverse groups of people and to absolutely ensure that no discrimination occurs based on any individual or group's age, class, disability, employment status, ethnic origin, gender, marital status, pregnancy, maternity, nationality, religion, sexual orientation, gender reassignment or special needs.

This policy covers all issues relating to equality, diversity, and inclusion in **NDD** and seeks to comply with the requirements of the Equality Act 2010 as well as best practice.

Communication

All learners will be made aware of our Equality, Diversity, and Inclusion Policy upon enrolment onto qualifications and training programmes.

The policy will also:

Be available to read on the **NDD** public website.

Be available to read on the **NDD** internal learner portal.

All members of the **NDD** management and delivery team will be trained on Equality, Diversity, and Inclusion issues as well as the Equality Act 2010. These teams will also be made aware of the reporting process for any concerns around Equality, Diversity and Inclusion matters and will be made aware of their responsibilities in line with this policy.



Duties, Roles and Responsibilities

Protected Characteristics

The following list consists of the protected characteristics as defined by the Equality Act 2010:

- Age
- Disability
- Gender Reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual Orientation

Duties

General duties under the Equality Act 2010, NDD has a duty to have due regard for the need to:

- Eliminate unlawful discrimination, harassment, and victimisation.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.
- Remove or minimise disadvantages suffered by people due to their protected characteristics.
- Take steps to meet the needs of people from protected groups where these are different from the needs of other people.



NDD also has the responsibility to prevent any other types of discrimination that can occur such as:

- Associative discrimination
- Indirect discrimination
- Discrimination by perception
- Harassment and harassment by a third party

Roles and Responsibilities:

The Senior Leadership Team (**SLT**) are to ensure that **NDD** meets its legal and ethical obligations with respect to the general and specific duties outlined in this document.

The SLT must ensure that:

- **NDD's** strategic plan includes a commitment to Equality, Diversity, and Inclusion.
- All staff are trained on Equality and Diversity.
- The procedures for staff recruitment and career development are in line with Equality, Diversity, and Inclusion best practice.

It is the responsibility of all NDD staff and associate trainers and suppliers to:

- Be aware of **NDD's** duties in relation to Equality, Diversity, and Inclusion.
- Challenge inappropriate behaviour by staff and learners.
- Confront discrimination wherever and whenever it may occur.

All NDD learners should:

- Be made aware of the **NDD** policy and attitude towards Equality, Diversity and Inclusion through marketing as well as embedding it in learning programmes.
- Treat all individuals and groups they encounter with respect and dignity, showing respect for the cultures and personal choices of other people.
- Report any incidents involving bullying, harassment, discrimination using the **NDD** procedure.



- **NDD** will also take care to ensure that our marketing and publicity considers and represents the diversity of our workforce, our learners and wider society.

Policy Implementation, Assessment and Monitoring

Implementation

NDD will ensure that all policies and procedures are non-discriminatory, and that any monitoring or positive action processes are regularly reviewed.

All **NDD** members of staff must be trained in Equality, Diversity, and Inclusion within 12 months of induction.

Compliance

Learners

Should any learners experience or witness any discriminatory behaviour, they should immediately report this to their Skills Coach, Lead Trainer or Head of Teaching and Learning. Incidents will be investigated in line with **NDD's disciplinary policy** and procedures. **NDD** will then take appropriate disciplinary action.

Any discriminatory behaviour by learners, including towards NDD staff, will be dealt with in accordance with the Equality Act 2010.

Staff

Staff who feel that they are being discriminated against by other members of staff should raise the matter under the grievance procedure, which if the matter is upheld, may lead to the use of the staff disciplinary procedure.

Review

This policy will be reviewed annually with all Apprenticeship Policies and sooner if there are changes to law or best practice.



Complaints Policy and Procedure

Introduction

Nine Dots Development (NDD) is committed to providing a high-quality experience for all its users through its training delivery. It encourages a positive environment in which informal contact and feedback from learners and employers is welcomed and where complaints can be dealt with effectively and efficiently. The **complaints procedure** outlines the processes to be used when a learner has cause for concern.

Aims of the Policy

- To provide a clear framework to help anyone who is not satisfied with the company's services to raise their concerns and to ensure that the company responds effectively.
- To ensure that the company has systems in place to implement improvements as a result of a complaint.
- To encourage prompt resolution at an early informal stage.
- To ensure that all complaints are dealt with seriously, fairly and sensitively, with no resultant victimisation of a complainant.
- To raise awareness of the policy and procedures and ensure that staff understand the processes through appropriate training.
- To define responsibilities and allocate duties to individual members of company staff in relation to procedures set out.

Scope

This document should be used by anyone who wishes to make a complaint about our services including students, employers, partners, or other users.

Definitions

A complaint is

- an expression of dissatisfaction about an organisation's action or lack of action, or about the standard of service provided by or on behalf of the organisation.



Requests for services or changes to services, comments, suggestions and questionnaire feedback are not considered as complaints and therefore, do not fall within this process.

Roles and Responsibilities and Procedure

All trainers and staff have a responsibility for receiving complaints, treating them seriously and dealing with them appropriately. Wherever possible, **complaints should be recorded and dealt with informally and promptly**. All complaints (**formal and informal**) received by a member of staff **must be recorded promptly**.

The Complaints are to be reviewed weekly at Board meetings, but it is the responsibility of the member of staff taking the complaint to either resolve it or refer it to the correct person immediately, as well as to record this activity. Smaller or informal complaints should be resolved within 5 working days. More complex or larger complaints will be resolved within 20 working days.

Responsibility for resolving complaints works in the following order:

- Person hearing complaint - if they have the authority and expertise to resolve the complaint should do so and record in NINA/Talent, if not, they should escalate the matter to their manager
- Manager - if the manager has the authority and expertise to resolve the complaint they should do so and record in NINA/Talent, if not they should escalate the matter to a Director
- Directors - Wendy Chadwick (Director of Apprenticeships) and Jordan Burke (Director) act as the next stage of escalation, depending on who is most able to resolve the specific complaint, whichever of the two are not utilised at this stage, becomes an Appeal/Escalation point as a final stage of the process.

Confidentiality

All complaints will be handled sensitively and with discretion. If a learner makes a complaint against a member of staff, that member of staff may be informed about the substance of the complaint so that they are in a position to make a response.

The company will not normally investigate anonymous or malicious complaints except in exceptional circumstances and for justifiable reasons. This may be considered if the complainant wishes to remain anonymous in cases of harassment.



Informal Complaints

- 1.1. It is hoped that most complaints can be dealt with using informal procedure.
- 1.2. Concerns should be raised in the first instance at a local level with the area or relevant person trainer, coach, assessor or programme manager as soon as possible, and no later than 3 months after the incident. If appropriate, a meeting will be offered between the person complaining and area they are complaining about to arrive to an agreed resolution.
- 1.3. If a complaint is about a trainer or member of staff, it should internally be referred to the appropriate line manager.
- 1.4. If a learner reports a fault with the training environment (e.g. not clean or broken chair etc.) or its surrounding facilities, the trainer is to report it to the Learner Experience and Operations Manager at the earliest opportunity.
- 1.5. At this informal stage complaints may be made in person, by phone or by email.

Formal complaints

Where complaints are very serious or the matter has not been resolved informally, the complainant should raise a formal complaint under the following procedure.

Complaints made more than 3 months after the incident will not normally be investigated.

- 2.1. **Submission of complaint in writing:** The complainant should submit complaints in writing to a Director.
- 2.2. **Acknowledgement:** The Director will send an acknowledgment (normally within 5 working days) stating who will be investigating the complaint and that a response will be provided within 20 working days.
- 2.3. **Logging the complaint:** Staff receiving complaints log them on the NINA/Talent system.
- 2.4. **Investigation of the complaint:** The Director will carry out the investigation. During this stage the complainant may be contacted for further information or to be invited to meet the Director (they may be accompanied by a friend or family member, however, an accompanying person cannot take active part in the proceedings but can offer support to the complainant).



2.5. Resolution: The Director will consider the complaint thoroughly and will make a judgement based on evidence gathered and **will decide to:**

- Dismiss the complaint as unfounded, giving reasons.
- Uphold or partially uphold the complaint, propose an amicable settlement, take appropriate steps to address the issue and to avoid a similar problem arising in the future.

The outcome of the investigation will normally be communicated to the complainant by the Director and a copy of the letter will be kept on file.

2.6 Dissatisfied at the outcome of a complaint: If there is dissatisfaction at the outcome of a complaint investigation carried out by **Nine Dots Development** for a qualification programme, the complainant has the right to escalate their complaint to the Awarding Body (**ILM or CMI**). For funded programmes, if the complainant is still dissatisfied with the outcome from the awarding body, they can escalate the complaint to the relevant End Point Assessment organisation, **Qualification Regulator or Government Body (ESFA)***

2.7 Quality improvement: The Director will ensure that relevant action is taken to change procedures or implement staff training to prevent recurrence of the complaint.

2.8 Monitoring the complaint: The SLT is responsible for monitoring all logged complaints to ensure they are resolved **within the allotted 20 working days** and will inform the complainant if they are unable to meet the agreed timescale.

2.9 Evaluation: A record of complaints and outcomes will be recorded on a complaints database. The database will be analysed on a regular basis to ensure that actions are carried out to address issues raised.

2.10 Reporting: A report on complaints received will be made available for discussion at senior management meetings on a quarterly basis.



* How and when to contact the ESFA

How to complain to ESFA (taken from the ESFA)

We only accept complaints in writing, by email or letter, except where we are required to make reasonable adjustments. Please let us know if this applies to you, either through a third party or by [calling us](#), and we will arrange for someone to handle your complaint accordingly.

If you have difficulties in providing details in writing or if you are under 18, we will consider complaints made on your behalf by a third party. You will need to confirm that we can communicate with that third party on your behalf. If the complaint is on behalf of more than one person, we will need written permission from everyone.

You should email complaints to complaints.esfa@education.gov.uk, or put them in a letter to:

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

This policy is updated annually and was last updated on 22nd March 2024



Appeals Policy

Introduction

At **Nine Dots Development** our aim is to be fair, transparent and consistent in the way that we operate all of our qualification programmes, in the event that a learner should feel it necessary to make an appeal it will be considered based on either of the following grounds:

- That, at the time of the assessment, there existed circumstances which adversely affected the learner's performance and which the learner was unable to communicate to the assessor before a decision was reached. In making such a case, the learner shall provide valid documentary evidence where appropriate. Retrospective medical certification will not be accepted as valid;
- or
- That there has been an administrative error or procedural irregularity during the conduct of the relevant assessment of such a significant nature as to have materially affected the approved grade or mark awarded.

Early Resolution

The learner should firstly raise the appeal related matter informally at a local level with the relevant, trainer, coach, assessor or programme manager as soon as it arises.

If the matter cannot be resolved informally / locally, and if there are valid grounds, the learner can submit a formal appeal

Formal Appeal

If, after attempting to resolve the matter at a local level a learner wishes to proceed with a formal appeal, this must be made within 20 working days of the results or the decision of assessor.

The Appeals Group, consisting of 2 member of the SLT, will meet to discuss the appeal and will reach a decision which will be communicated to the learner in writing within five working days of the meeting.

The next line of support for learners is to appeal to a neutral Director (one who has previously not been involved) within 20 days of the appeal outcome. This will be considered and an outcome communicated within 5 days. Should a satisfactory outcome not be reached in that instance, the ILM can be contacted as the ultimate authority should the learner not be satisfied with the outcome. The learner may also choose to contact the ILM directly if they feel unhappy with any part of the process.



Actions to Implement the Policy

Informing Learners

Nine Dots Development will communicate the Appeals and Complaints Policy to learners through the following means:

- Programme Induction
- Company Intranet
- Learner reviews.

This policy is updated annually and was last updated on 12th January 2024



Health and Safety Policy

Introduction

Nine Dots Development (NDD) is committed to high standards of health and safety. It is our policy, as a company, to maintain high standards and to encourage our staff to contribute to their own welfare and that of their colleagues and learners.

Ensuring safety awareness, positive attitudes and continuous improvement in safety performance requires the commitment and active involvement of Directors, Managers, and staff at all levels.

Our objectives are, so far as is reasonably practicable, to prevent accidents, resulting in injuries, ill health and/or damage to property, and to conserve the environment.

NDD recognises its obligations under **the Health and Safety at Work Act 1974** and related legislation.

The company will, in the conduct of its activities and so far, as is reasonably practicable:

- Protect the health and safety of its learners, employees and others that may be affected by its activities.
- Limit adverse effects on the physical environment in which those activities are carried out.

NDD recognises that the skills and energies of its employees are amongst its greatest assets and it has a responsibility to provide for their welfare and equally for its learners, contractors, vendors, and visitors.

So far as is reasonably practicable, NDD will:

- Provide and maintain safe working environments and practices that do not constitute risks to health, safety, and welfare.
- Formulate standards and policies that comply with relevant statutory requirements in respect of health, safety, welfare, and the environment, as they affect employees, learners, contractors, and the public.
- Actively promote a positive health and safety culture through the development of good practice.
- Safeguard employees, learners, and all others from foreseeable hazards with regard to health, safety, or the environment, in current processes, practices and working systems.



- Ensure that, when new substances, plant, machinery, equipment, processes, or premises are introduced, adequate guidance, instruction and supervision are provided for safe methods of work to be developed.
- Train employees to be aware of their own responsibilities in respect of health, safety, welfare, and environmental matters, and to ensure they actively participate in good practice that leads to the prevention of accidents and occupational and non-occupational injuries and diseases.
- Without detracting from the contractor's own legal responsibility, **NDD** will ensure that contractors are informed of relevant associated risks, have been made aware of safety procedures and are monitored for compliance.
- Use, where reasonably practicable, advice and guidance to promote good health and to avoid occupational and non-occupational injuries and disease.
- Establish procedures for monitoring compliance with the safety standards and co-operate with authorities and technical organisations, to ensure policies are kept up to date.
- To review and revise this policy as necessary at regular intervals.

NDD learners should also understand their Employer's Health and Safety Policy

Roles and Responsibilities

The **Directors** of **NDD** are responsible for ensuring that this policy is applied across the organisation and in all of its activities, especially at **NDD** sites and offices. Since the majority of work carried out by **NDD** takes place on client sites and is carried out by the **NDD** training team or employees and associates, the following specific objectives will be set for individuals working on client sites:

- **NDD** will liaise with clients to understand their **Health and Safety policies** and procedures prior to initial site visits.
- **NDD** will liaise with clients when arriving at their site to understand **Fire and Evacuation procedures** as well as any planned drills for the duration of **NDD's** work there.
- All **NDD** staff, associates or contractors will be trained on **Health and Safety**.
- **NDD** staff, associates or contractors will report near misses, accidents, or incidents immediately to the client when they occur on client sites as well as to **NDD Directors** at the end of the day so that appropriate action can be taken.
- Every employee has a statutory duty to co-operate with the company policy in the provision and effecting of health and safety at work.



- Learners and visitors are required to comply with the company's health and safety processes and procedures and should be registered appropriately at relevant locations reception or appropriate person on their arrival and departure from an **NDD** site. Additionally, **NDD** staff, associates and contractors must comply with similar policies and procedures on client sites.
- Learners and visitors are not to interfere with anything provided to safeguard their health and safety.

Particular implementation tasks include:

This policy sets out in detail how Health and Safety applies to all employees and all other visitors to **NDD locations**.

- Allocation of sufficient resources to operate and maintain safe and healthy places of work.
- Ensuring adequate information is clearly displayed on specific hazards applicable to each site.
- Provision of adequate fire protection, first aid equipment and health monitoring procedures at all sites.
- Actively encourage and take account of feedback on health, safety, and environmental issues at the appropriate forums to review and continually improve current policy and procedures.

It is the responsibility of the **Directors** to assess, using appropriate guidance, the number of first aid trained personnel needed to support the business activities. Training is to be obtained regionally through a recognised provider.

The **Directors** are to appoint sufficient fire marshals to support the business activities. Training to be provided by a recognised training provider.

The **Directors** are to nominate a **Health & Safety representative** as a focus for all issues. Training to be provided by a recognised training provider.

The **Directors** are to ensure that all tasks undertaken are considered and a risk assessment carried out if appropriate.

A risk assessment is simply a careful examination of what in your location/work could cause harm to people. The law does not expect that all risk will be eliminated, but it is a requirement to protect people 'so far as is reasonably practicable'.

Risk assessments will be undertaken by a competent appointed or nominated person.

The findings of the risk assessments will be reported to the **Directors**.



Action required to remove/control risks will be approved by the **Directors**.

The **Directors** will be responsible for ensuring the action required is implemented.

Assessments will be reviewed annually or when the work activity changes, whichever is sooner.

Manual handling plays a part in every day operations and all staff should cover manual handling training as part of their mandatory training program.

The **Directors** are responsible for ensuring that their employees working at locations under the control of other employers are given relevant health and safety information for that specific location.

Employee induction training will be provided for all employees within a reasonable time frame when they start their employment. Specific training will be provided for any additional tasks, as necessary. In addition, refresher training must be considered when skills are not frequently used.

Job specific training must be identified by the **Directors** and provided accordingly.

Specific jobs requiring special training are:

- First aiders
- Fire and safety marshals
- Employee CPD and Training records are to be kept up to date.
- Mandatory training will be arranged and monitored by the company **Health & Safety Officer**.
- First aid boxes are to be kept on **NDD** sites.
- **First aiders** who have undertaken the appropriate training should be easily recognisable using workstation identification markers.
- All accidents and cases of work-related ill health are to be recorded in the accident book. The book is to be kept in a suitable location.

The **Directors** are responsible for reporting accidents, diseases, and dangerous occurrences to the **Company Health & Safety Representative** so they can be appropriately reported to the local enforcing authority (**HSE**).

To check our working conditions, and to ensure our safe working practices are being followed, we will:

Carry out spot checks and visits.

Investigate all incidents of accident and ill health.



The **Health & Safety representative** is responsible for investigating accidents.

The **Directors** are responsible for investigating work related causes of sickness/ absences.

The **Directors** are responsible for acting on investigation findings to prevent a reoccurrence.

The **Directors** are responsible for ensuring the fire risk assessment is current, in date and implemented.

All **NDD staff**, trainers and associates should ensure escape routes are checked, to ensure they are clear of obstruction; doors for their operation; and have the correct clear signage. This should be checked prior to commencing work on client sites.

The **Directors** are to ensure there is a process in place for the maintenance of all the tenant owned fire extinguishers. These should be checked annually by a service engineer. In addition, a responsible person should carry out a visual check on all equipment at least once per month. The visual check will ensure the equipment is serviceable, available for use and unobstructed. Promptly reporting any suspected defects or malicious discharges for immediate attention.

Alarms are to be tested weekly. In multi tenanted buildings this should be carried out by the landlord's agents. Notification of such tests should be clearly displayed at a prominent point for all staff to see and should take place on a consistent day and time.

Emergency evacuation is to be tested every 6 months; only key personnel should be informed of the practice details. A debrief post evacuation should take place with all fire marshals and key personnel to understand any difficulties experienced and to improve the understanding of the responsibilities by those nominated as marshals.

This statement of general policy on health and safety at work and of the organisation and arrangements for carrying out policies is made **under Section 2(3) of the Health and Safety at work etc. Act 1974**. It is to be brought to the notice of all employees of **NDD** and a summary of this policy is to be included in the **Employee Handbook**.

Learner Accident or Ill-Health Procedure:

- At a client's/employer's site the learner and **NDD Trainer/Skills Coach** will follow the local procedure. Any concerns are to be brought to the attention of the responsible person on site and reported back to the **Health & Safety Representative** at **NDD**.
- For **NDD** sites, in cases of immediate emergency the **NDD Trainer/Skills Coach** will call the emergency services and subsequently notify the **Health & Safety** representative and the first-aider to provide appropriate assistance to the learner.



- In all other cases the **NDD** will notify the **Health & Safety** Representative and the first-aider to provide appropriate assistance to the learner.
- In all cases, immediate notification to a **Director** by the **Health & Safety Representative** will be required. The **Directors** have responsibility to communicate the situation to the Learner's Employers of the situation.

Communication to Learners

All learners will be made aware of our **Health & Safety Policy** upon enrolment onto qualifications and training programmes.

The policy will also:

- Be available to read on the **NDD** public website.
- Be available to read on the **NDD** internal learner portal.
- Be used to audit learner experience annually and assessed in our learner feedback and learner support sessions.
- These teams will also be made aware of the reporting process for and concerns around **Health & Safety** and their responsibilities in line with this policy.

Communication to Employees

All Employees will be made aware of our **Health & Safety Policy** upon joining NDD. Section 5 of the Staff handbook covers basic Health and Safety guidance and this more detailed policy will be available to all staff via Google Drive.

Reviewing the Policy

- This policy will be reviewed annually





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