

# Data Protection Policy

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Utopian Training Solutions Ltd

Data Protection Policy

Effective Date: 01/02/2025

Review Date: 01/02/2026

## 1. Introduction

Utopian Training Solutions Ltd is committed to protecting the rights and privacy of individuals in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and all other relevant legislation. This policy outlines how we collect, use, store, share, and protect personal data of staff, learners, volunteers, contractors, funders, and other stakeholders.

## 2. Scope

This policy applies to:

- - All staff, contractors, and volunteers working for or on behalf of the Centre
- - All personal data processed in relation to learners, parents/guardians, stakeholders, funders, and referral partners
- - All forms of data (digital, paper-based, verbal)

## 3. Definitions

- Personal Data: Any information that relates to an identified or identifiable individual.
- Special Category Data: Sensitive data including health, ethnicity, religion, and criminal records.
- Data Controller: Phoenix Education Centre, which determines the purposes and means of data processing.
- Data Processor: Any individual or organisation that processes personal data on behalf of the Centre.
- Processing: Any operation performed on personal data including collection, storage, retrieval, sharing, and destruction.

## 4. Principles of Data Protection

Utopian Training Solutions Ltd adheres to the following UK GDPR principles. Personal data shall be:

1. Processed lawfully, fairly, and transparently
2. Collected for specified, explicit, and legitimate purposes
3. Adequate, relevant, and limited to what is necessary
4. Accurate and kept up to date
5. Kept only for as long as necessary
6. Processed in a manner that ensures appropriate security

## **5. Lawful Bases for Processing**

We process personal data under the following lawful bases:

- Consent: When freely given and informed.
- Contract: Where processing is necessary for a contract with the data subject.
- Legal Obligation: To comply with a legal duty.
- Vital Interests: To protect someone's life.
- Public Task: When carrying out official functions or tasks in the public interest.
- Legitimate Interests: For purposes such as service improvement or safeguarding, balanced against the rights of the individual.

## **6. Types of Data Collected**

We may collect and process the following personal data:

- Name, address, date of birth, contact details
- Education records, qualifications, attendance, and progress
- Health information or support needs
- Photographs or video (with consent)
- Referral and support agency details
- Contractor and staff records
- Incident reports and safeguarding records

## **7. Data Subject Rights**

Data subjects have the following rights:

- To be informed about how their data is used
- To access their personal data
- To have inaccurate data corrected
- To have data erased ("right to be forgotten") in certain cases
- To restrict or object to processing
- To data portability (where applicable)
- To withdraw consent at any time (if processing was based on consent)

Requests should be submitted in writing to:

Data Protection Lead

Utopian Training Solutions

Edward Hanna [edward@utopianlearning.org](mailto:edward@utopianlearning.org)

## **8. Data Security**

We ensure:

- Personal data is stored securely (password-protected systems, locked filing cabinets)
- Access is limited to authorised individuals
- All staff and contractors receive data protection training
- Data breaches are promptly investigated and reported in line with our Data Breach Procedure

## **9. Data Sharing**

We may share personal data with:

- Partner organisations and contractors delivering services
- Statutory agencies (e.g., schools, social services, PSNI, EA)
- Funders for reporting (only anonymised data unless otherwise required)
- Accreditation bodies for qualifications

All sharing is done under appropriate agreements or legal obligations, ensuring minimum necessary data is shared.

## **10. Contractors and Third Parties**

Any contractors or third parties handling personal data on behalf of the Centre must:

- Sign a data processing agreement
- Comply with UK GDPR
- Follow our data protection and confidentiality requirements

## **11. Data Retention**

Data will be retained only for as long as necessary:

- Learner records: 6–7 years post-leaving
- Safeguarding records: Retained in line with statutory guidance
- Staff/contractor records: 6 years after contract ends (unless otherwise required)

Our full Data Retention Schedule is available on request.

## **12. Complaints and Breaches**

Data breaches will be reported to the ICO within 72 hours if required.

Complaints should be made in writing to the Data Protection Lead.

If unresolved, complaints can be escalated to the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)).

ICO Registration

Organisation name: **Utopian Training Solutions Ltd**

Reference: **ZB021123**

expiry date of 18/03/2026.

### **13. Policy Review**

This policy is reviewed annually or in response to significant changes in legislation or practice.

Approved by: Daphne Hanna

Date: 01/02/2025



# Utopian Training Solutions

## Child Safeguarding & Vulnerable Adults Policy

### 2025

Review Date 4/04/2026

Safeguarding Lead: Emily Morgan & Daphne Hanna

## Section 10 – Safeguarding

### 10.1 Safeguarding of Children and Child Protection Policy.

#### 10.1.1 Introduction

Utopian Training Solutions is committed to the safeguarding and protecting of children and Adults at Risk. It is the policy of the organisation to promote the best interests and welfare of children. This principle is enshrined in the Children Order (Northern Ireland) 1995, the Safeguarding of Vulnerable Groups (Northern Ireland) Order 2007 and underpinned by the UN Convention on the Rights of the Child. Utopian Training Solutions is dedicated to ensuring the full realisation of the rights of all children and adults at risk across Northern Ireland.

Utopian Training Solutions wants all adults to enjoy their involvement with us whether on a work experience placement or as a visitor to one of our properties. It may be that your area of work rarely, if ever, brings you into contact with adults at risk but, they are entitled to be safe with you and may look up to you as a role model. This policy is intended to help us all to honour that. [This policy was reviewed by an external auditor on 3<sup>rd</sup> April 2024](#) by the International Committee for the Red Cross.

While primarily intended to safeguard adults at Risks, our policy is also meant to protect staff – and others working with us including contractors and consultants – from any false allegation of improper conduct in that regard. With this purpose in mind, the guidance given here is intended to help you understand how the policy is meant to be applied in practice. We cannot cover every possible eventuality, but hopefully they do cover most situations that you are actually likely to encounter.

It is the policy of Utopian Training Solutions to safeguard the welfare of all children and adults at risk with whom we come into contact by attempting to protect them from neglect and physical, sexual and emotional abuse. Utopian Training Solutions will safeguard children and adults at risk by adopting and implementing its Safeguarding Policy.

#### 10.1.2 POLICY STATEMENT

We will endeavour to ensure that adults at risk are protected from harm while they visit our properties. We will do this by:

1. Making sure our staff, trainees and volunteers are carefully selected.
2. Provide appropriate training for staff, trainees, and volunteers in issues of adults at risk protection.
3. Taking all reasonable steps to ensure the health, safety, and welfare of any adult at risk in contact with Utopian Training Solutions.
4. Not physically, emotionally, or sexually abusing any adult at risk in contact with Utopian Training Solutions
5. Taking all reasonable steps to prevent any staff member, trainees volunteer, persons working for us or member of the public from putting any adult at risk in a situation in which there is an unreasonable risk to their health and safety.

6. Taking all reasonable steps to prevent any staff member, trainee and volunteer, persons working for us or member of the public from physically, emotionally, or sexually abusing any adult at risk.
7. Reporting to a Designated Officer any evidence or reasonable suspicion that an adult at risk has been physically, emotionally, or sexually abused in contact with Utopian Training Solutions.
8. Referring to statutory authorities all incidents reported to Designated Officers.
9. Implementing this policy in conjunction with our Health and Safety guidelines already in place.
10. Ensuring that signage is displayed at Utopian Training Solutions and at all centres, indicating that Utopian Training Solutions has a policy for Safeguarding Adults at Risk, and where copies can be obtained.

### 10.1.3 Scope

This Safeguarding Policy is intended to cover all functions of the Utopian Training Solutions and applies to all Utopian Training Solutions staff/volunteers, especially those who work directly with children and adults at risk (regulated positions). The term employee includes anyone who works full-time, part-time, seasonally, on-call, on a student placement or as a volunteer.

This Safeguarding Policy is designed to provide a foundation for Safeguarding within Utopian Training Solutions. Specific guidance may additionally be developed to meet the needs of particular functions/ or services, as required.

### 10.1.4 Definition of abuse

Defining abuse is a complex issue. All staff/volunteers should be made aware of what constitutes abuse:

- **NEGLECT** is the actual and persistent failure to meet the basic needs or important aspects of care, resulting in the significant impairment of the health or development, including failure to provide adequate food, shelter and clothing **OR** neglect of a child or adult at risks' emotional needs
- **PHYSICAL ABUSE** includes hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child or adult at risk including fabricating the symptoms of, or deliberately causing, an adult at risks' ill-health
- **EMOTIONAL ABUSE** is the actual and persistent emotional ill-treatment or rejection resulting in severe adverse effects on the child or adult at risks' development. This may include conveying to a child or adult at risk that they are worthless, unloved and inadequate, or where impossible expectations are placed upon a child or adult at risk. It may also involve regularly exploiting, corrupting or frightening a child or adult at risk.
- **SEXUAL ABUSE** involves forcing a child or adult at risk to take part in sexual activities, whether or not the child or adult at risk is aware of the activity or is involved in sexual activities that they are unable to give informed consent or that violate social taboos or family roles. **Child Sexual Exploitation (CSE)** is a form of sexual abuse in which a person(s) exploits, coerces and/or manipulates a child or young person into engaging in some form of sexual activity in return for something the child needs or desires
- **FINANCIAL OR MATERIAL ABUSE** involves theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits

- **DISCRIMINATORY ABUSE** involves abuse based on a person's race, gender, sexuality, disability, religious and/or political beliefs and can take the form of harassment, slurs or similar mistreatment

- **INSTITUTIONAL ABUSE.** This is repeated instances of poor care of individuals or groups of individuals. It can be through neglect or poor professional practice as a result of structures, policies, processes and practices within an organisation. While this in no way condones the abusive practice on the part of individuals, it recognises the powerful influence that organisational culture has on individual behaviour.

***The above list should not be considered an exclusive or even exhaustive list of the types of abuse which can be experienced by children and adults at risk and the majority of the above abuse can also happen online.***

### 10.1.5 POLICY OBJECTIVES

- There is clear guidance for reporting safeguarding concerns that a child or adult at risk is, or may be, at risk of being harmed or in need of protection and how these will be responded to.

- To ensure effective selection, supervision and training of staff/volunteers in relation to safeguarding of children and adults at risk.
- To put in place appropriate and timely referral and reporting arrangements with statutory and other agencies dealing directly with safeguarding of child and adults at risk.
- To ensure that safeguarding responsibilities are fully understood and complied with
- To ensure that all those working for, or representing the Utopian Training Solutions adhere to our Code of Good Behaviour for working with Children and Adults at risk.
- To serve as a model of good practice to the wider community.

### 10.1.6 Recruitment

In accordance with The Safeguarding Vulnerable Groups (Northern Ireland) Order 2007,

Utopian Training Solutions will ensure that the relevant ACCESS **NI (NI)** check will be carried out before appointing anyone to a **regulated position** and comply with Vetting & Barring Scheme arrangements.

In defining **a regulated position**, the following criteria will be used:

- A position whose normal duties include the caring for, training, advising, counselling, supervising or being in sole charge of children
- A position whose normal duties include unsupervised contact with children under arrangements made by a responsible person
- A position whose normal duties include supervising or managing an individual in his work in a regulated position

Utopian Training Solutions will only request a check on the individual to whom a conditional offer of appointment has been made. Checks will not normally be requested on existing staff/volunteers, however, a check may be requested if:

- An individual takes up new duties in a regulated position with children, where this had not previously been the case
- Serious allegations have been made about an individual already working with children or new information comes to light.
- Information provided under ACCESS NI arrangements will be treated as highly sensitive and will be at all times treated as strictly confidential.

If Utopian Training Solutions becomes aware that an individual who is employed or who is a volunteer is subject to a Disqualification Order, or who is included in the **DWC NA (NI)** List then the



individual will be moved to a non-childcare position or have their employment/volunteer placement terminated.

Additionally, Utopian Training Solutions may refer names to the Belfast Health & Social Care Trust. (N.H.S.C.T.) This would occur where Utopian Training Solutions has dismissed an individual, the individual has resigned, retired or has been transferred to a position, which is not a regulated position.

No matter how good the recruitment and selection procedures may be, they are not 'foolproof. Best practice standards in management and supervision of staff/volunteers and volunteers after appointment is important.

#### **10.1.7 Reporting Procedures**

Elected members, members of staff, volunteers, coaches and other users have a duty of care to the child, young person or adult at risk to report anything deemed as suspicious.

**It is not our responsibility to decide if a child or adult at risk is being abused. Our role is to act on any concerns.**

**All allegations or suspicions are to be treated seriously. No abuse is acceptable and some abuse is a criminal offence and must be reported to the PSNI as soon as possible.**

Utopian Training Solutions will share any significant information about staff/volunteers' or others' behaviour deemed to be putting children at risk of harm with police and social services.

**Staff/volunteers must fill in an Incident Report Forms Appendix 1** incidences or concerns to their line manager where:

- Staff/volunteers observe abuse occurring
- A child or adult at risk tells them that there is abuse occurring
- They have concerns over the propriety of activities
- They suspect that a child or adult at risk is suffering abuse • They accidentally hurt a child or cause distress in any manner.
- A child appears to respond in a sexual manner to staff/volunteers' actions, misunderstands or misinterprets something they have done.
- Information is provided by a third party (e.g. another child/adult at risk or worker)

#### **10.1.8 Disclosure Guidelines**

Children and adults at risk rarely discuss the subject spontaneously – it may take weeks or months for a child or adult at risk to talk about his/her experiences. Never promise to keep information a child or adult at risk is telling you a secret. If a child or adult at risk is telling you it is because he/she wants it to stop. Carefully explain that because of the nature of the disclosure you are required to pass this information on to the relevant agency.

Always let the child or adult at risk know who you are going to tell and the implications of telling them.

- Stay calm and reassuring
- Find a quiet place to talk, inform colleagues that this is occurring ensuring that actions cannot be mistaken for collusion
- Take seriously what the child or adult at risk is telling you
- Listen and do not press for information
- Do not ask leading questions

- Acknowledge the child/adult at risk's confused feelings stressing that it is not their fault
- Follow the procedures (outlined in this policy)
- Do not attempt to deal with the matter further on your own informing the child/adult at risk of your intended actions and reasons for them.

Discuss disclosure with a Safeguarding Officer at Utopian Training Solutions Sam White Email address

- It is important that timely and accurate records are kept about any safeguarding concerns about a child or adult at risk
- Staff must record information on the Safeguarding incident report and complete the checklist as soon as possible and no more than 24 hours after any issue concerning actual or suspected abuse against a child or adult at risk.
- All records must be signed, dated and timed. Records should be an account of factual information and any view/judgement expressed about these facts should be clearly qualified as such
- Records need to cover four specific areas:
  - **Everything and everyone that was seen or observed** – including actual injuries, parents/carers experiencing difficulties in providing basic care or consistently negative behaviour towards a child or adult at risk.
  - **Any allegations or disclosures made** by a child or adult at risk, carers or anyone else; if possible it is best practice to write down the actual words used to describe the abuse/harm
  - **Any explanations** given for injuries or statements made by the child or adult at risk or others
  - **All action taken** such as discussion with the Safeguarding Officer, contact with Statutory Social Services, relevant agencies, third party organisations
  - All records must be kept in a secure place

#### 10.1.9 Referral

The decision to refer or not to refer should be made by the Safeguarding officer and the relevant Management member.

When considering the decision as to whether to refer on to another agency (e.g. to PSNI, Social Services etc.) the following should be taken into account:

- The wishes of the child or adult at risk & their right to self-determination
- The mental capacity of the child or adult at risk
- Known indicators of abuse
- Level of risk to this individual
- The seriousness of the abuse
- The effect of the abuse on the individual
- Level of risk to others
- The effect of the abuse on others
- Whether a criminal offence has been committed
- Whether other statutory obligations have been breached
- The need for others to know

- The ability of others (e.g. PSNI, Social Services) to make a positive contribution to the situation.

#### **10.1.10 Allegations against staff**

Staff/volunteers working with children and adults at risk may feel vulnerable to accusations of abuse of a child or adults at risk. Staff/volunteers and other users should refer to the Code of Behaviour in order to protect themselves and reduce any possibility for false allegations. Failure to adhere to this Code of Good Behaviour may result in disciplinary proceedings.

Any staff member or volunteer under supervision has the right to be notified about the cause of concern. This will be done in consultation with social services, the police and/or management committee, where appropriate. Any investigation will be implemented in accordance with Utopian Training Solutions. Complaints/Grievance Policy as necessary. If allegations are made, it is important to:

- Stay calm;
- Co-operate with the investigation;
- Seek advice and support from a manager/management committee or, if appropriate, a professional organisation, union, family or friends;
- Ensure that clear records are kept of any meetings attended, discussions or correspondence about the allegations;
- Avoid discussing the allegations with the person who made them.

Utopian Training Solutions will balance the right to confidentiality with the legal principle that the welfare of the child/adult at risk is paramount. It aims to protect both the rights of the child/adult at risk and of the alleged perpetrator by ensuring that only those who need to know are given the relevant information. It is essential that any concern in relation to safeguarding is treated as strictly confidential. A breach of confidentiality could be damaging for the child/adult at risk, their family and any safeguarding investigations that may follow.

A malicious allegation in relation to safeguarding is a very serious matter and will be treated in the same way as any other malicious allegation in Utopian Training Solutions. If a manager has reason to suspect that an allegation against another employee/volunteer is malicious he/she will investigate this. In the event that the suspicion is founded, the malicious allegation will be dealt with under Utopian Training Solutions existing disciplinary policy.

#### **10.1.11 Responsibilities**

##### **Board**

The Board will have overall responsibility for the Safeguarding of Children and Adults at Risk Policy.

##### **Safeguarding Officer**

- Ensure that staff are supported when necessary to protect child and adults at risk
- Ensuring that staff/volunteers are aware of and follow the policy
- Monitoring and controlling situations where over friendliness of staff/volunteers could lead to misconceived allegations
- Gathering information on reports of Safeguarding incidents and referring these to the relevant management committee member.
- Co-ordinate and monitor the Safeguarding Children and Adults at risk Policy

- Ensure that all relevant staff/volunteers are fully trained in and understand Safeguarding issues
- Ensuring that external service providers, organisations that hire Utopian Training Solutions premises comply fully with the Safeguarding Policy
- Sharing any significant information about employee's or others' behaviour deemed to be putting children/adults at risk, at risk of harm with police and social services, as necessary.
- Advising on the disciplinary procedure that may result from an investigation by either the Safeguarding or management.
- Ensuring that all staff/volunteers of Utopian Training Solutions, who have substantial access to children or adults at risk have undergone a ACCESS NI check.

#### **All Staff/volunteers**

All staff/volunteers should familiarise themselves with this policy, procedures and guidance. Utopian Training Solutions is committed to providing a positive and supportive environment for children and adults at risk based on respect. Any coercive, disrespectful or negative behaviour by staff/volunteers or service users whilst using Utopian Training Solutions premises should be addressed/ reported as necessary.

#### **10.1.12 Monitoring**

The policy will be reviewed a year after development and then every three years, or in the following circumstances:

- changes in legislation and/or government guidance
- as required by the *Safeguarding Board for Northern Ireland (SBNI)*
- as a result of any other significant change or event.

#### **10.1.13**

#### **CODE OF BEHAVIOUR FOR STAFF/VOLUNTEERS**

Utopian Training Solutions urges all staff/volunteers to be excellent role models in order to protect children and adults at risk to promote a positive culture and to avoid false allegations.

The duty to safeguard children and adults at risk in Utopian Training Solutions rests with all members of staff. All staff should ensure that they are aware of their responsibilities under the Safeguarding of Children and Adults at risk Policy.

Do and Don'ts for working with Adults at Risk **DO:**

- Be respectful and professional
- Listen, communicate
- Use common sense; be caring, attentive and aware
- Act in an appropriate manner
- Be sympathetic to their needs
- Be aware of your responsibility
- Be aware of policy and procedures
- Know the appropriate contacts and act appropriately
- Be responsible – report and support
- Constantly review and update all parties – positively feed into policy/procedures **DO NOT:**

- Treat as children
- Be aggressive
- Physically restrain
- Do anything of a personal nature they can do for themselves
- Re-enforce negative emotions/behaviours

- Engage in inappropriate behaviour
- Place yourself in a vulnerable position

### **Fostering a Positive Culture**

- Treat all service users equally, with respect and dignity Make sport fun, enjoyable and promoting fair play
- Give enthusiastic and constructive feedback, encouraging achievements rather than negative criticism
- Be watchful for bullying which may occur child to child, group to child or adult to child and report all concerns
- Recognise developmental needs and capacity
- Put welfare first, before winning or achieving goals Avoid excessive training or competition
- Do not push children and young people against their will
- In all circumstances the member of staff's professional judgement will be exercised and for most of this code of conduct will only serve to confirm what they have always done. However inappropriate actions in relation to any of the above may lead to staff disciplinary procedures being implemented.

### **Practices never to be sanctioned**

The following should **never** be sanctioned:

- Never engage in rough, physical or sexually provocative games
- Never share a room/tent/changing room/bath or shower with a child/young person
- Never allow or engage in any form of inappropriate touching
- Never allow allegations made by a child/ adult at risk to go unchallenged, unrecorded or not acted upon
- Do not undertake personal care for children/young people/adult at risk.
- Do not invite or allow children/adult at risk to stay with you at your home
- Do not leave foul, sexualised or discriminatory language unchallenged
- Do not make sexually suggestive comments

Do not reduce a child/young person/adult at risk to tears as a form of control  
Staff/volunteers should not transport a child/adult at risk alone.

Anyone wishing to record or take photographs of Utopian Training Solutions led activities should secure the written consent of the officer in charge of organising the event using Consent Forms. Utopian Training Solutions reserves the right to refuse permission.

Where Utopian Training Solutions officers intend to photograph or recording images of children, the prior consent of the parent/guardian of the child involved should be obtained using a Consent Form.

In order to minimise risks to children/adult at risk, staff/volunteers of Utopian Training Solutions will:

- Ask for parental permission to use their image.
- If the child is named, avoid using their photograph.
- If a photograph is used, avoid naming the child.
- Only use images of children/ athletes in suitable dress
- The photograph should focus on the activity not on a particular child

## Appendix 1 INCIDENT REPORT FORM

<b>Name:</b>	
<b>Address:</b>	
<b>Tel No/ Email:</b>	
<b>Relationship with Organisation:</b>	
<b>Date of Incident:</b>	
<b>Place of Incident:</b>	
<b>Details of Incident:</b>	Who what where when how
<b>Signature:</b>	
<b>Date:</b>	

All incidents reported will be treated in strictest confidence. Any significant information about employees'/volunteers' behaviour deemed to be putting children at risk of harm will be shared with police and social services. Every case will be decided on its own merits and a decision as to whether there is cause for concern will be based on the balance of probabilities, rather than conclusive proof. Decisions will be based on opinions formed reasonably and in good faith.

**Issue date: 12 September 2024**

Simply Business certifies that the information for Utopian Training Solutions LTD shown here is correct, as of the issue date above.

For full policy terms and conditions, please refer to the policy wording document.

Company name	Utopian Training Solutions LTD
Policy number	MHBI3691632XB
Employers Liability	up to £10,000,000
Public liability	up to £5,000,000
Professional indemnity	up to £1,000,000
Policy start date	17 September 2024
Policy end date	16 September 2025

A handwritten signature in black ink, appearing to read 'David Summers'.

David Summers  
*Group CEO, Simply Business*

## **Utopian Training Solutions Ltd**

### **Policy on Ethical Procurement, and Modern Slavery**

**Effective Date:** 01/02/2025

**Review Date:** 01/02/2026

Utopian Training Solutions Ltd is committed to conducting all business activities with integrity, transparency, and accountability. This policy sets out our approach to ethical procurement, the fair treatment of our supply chain partners, and our zero-tolerance stance on modern slavery in accordance with the Modern Slavery Act 2015 and other relevant legislation and standards. We recognise that our business decisions can have an impact on people and the environment. As such, we strive to ensure that all procurement and supplier management activities uphold human rights, promote sustainability, and create positive social value.

#### **The purpose of this policy is to:**

- Ensure that all procurement practices are carried out ethically and sustainably, with due consideration for environmental, social, and economic factors
- Promote fairness, respect, and partnership within our supply chain, ensuring that suppliers are treated with dignity and professionalism
- Prevent, detect, and respond effectively to modern slavery, human trafficking, forced labour, and exploitation within our organisation and our supply chain
- Demonstrate compliance with SV Organisational Behaviour requirements, fostering a culture of ethical decision-making, social responsibility, and continuous improvement

#### **This policy applies to:**

- All employees, contractors, associates and consultants of Utopian Training Solutions Ltd, regardless of their role or level of seniority
- All suppliers, vendors, and subcontractors providing goods and services to Utopian Training Solutions Ltd, including those involved in the delivery of training, facilities management, IT support, and other operational needs
- All procurement activities undertaken by or on behalf of the organisation, including sourcing, supplier selection, contract negotiation, and supplier performance management

#### **We are committed to a procurement strategy that promotes:**

- Sustainability: Ensuring that products and services are sourced in a manner that minimises environmental impact, supports ethical labour practices, and encourages responsible resource use
- Transparency: Maintaining open and clear procurement procedures, with documented decision-making processes and equal treatment of all bidders
- Integrity: Avoiding any form of corruption, bribery, fraud, or conflict of interest; all procurement staff must declare potential conflicts and act in the best interests of the



organisation

- Social Value: Giving preference to suppliers who demonstrate commitment to community benefit, diversity and inclusion, fair labour practices, and environmentally responsible operations
- Continuous Improvement: Working collaboratively with suppliers to identify opportunities for innovation and performance enhancement in ethical and sustainable procurement

**Utopian Training Solutions Ltd believes in fostering respectful, long-term, and mutually beneficial relationships with all suppliers. To ensure this, we will:**

- Treat all suppliers and contractors equitably, ensuring that procurement opportunities are accessible and inclusive
- Provide clear and accurate information regarding procurement requirements, timeframes, and selection criteria
- Honour contractual obligations fully and pay suppliers promptly within the agreed payment terms, recognising the importance of fair cash flow to smaller suppliers
- Avoid practices that place undue risk or burden on suppliers, including last-minute changes, unfair penalties, or contract terms that disadvantage one party
- Engage in open dialogue with suppliers, seeking feedback and working to resolve disputes fairly and quickly
- Support supplier development and capacity-building, particularly with small, medium, and social enterprises who align with our ethical standards

**We recognise the significant risks of modern slavery in global and domestic supply chains and take a proactive, risk-based approach to prevention. Our commitments include:**

- Conducting detailed due diligence and risk assessments on all new suppliers, particularly those in industries or regions known for higher risks of exploitation
- Requiring all suppliers to sign up to our Supplier Code of Conduct, which outlines our expectations in relation to modern slavery, human rights, working conditions, and ethical business practices
- Embedding modern slavery clauses in all contracts, giving Utopian Training Solutions Ltd the right to audit and terminate relationships with non-compliant suppliers
- Establishing robust mechanisms for reporting and escalating concerns, including anonymous whistleblowing procedures for staff and suppliers
- Providing mandatory training for relevant staff to help them identify indicators of modern slavery, understand their responsibilities, and know how to take action

**In the event of a suspected case of modern slavery within our supply chain, we will:**

- Immediately investigate the report and determine the appropriate course of action
- Engage with the supplier to understand the issue, and work to remedy the situation in line with ethical guidelines and legal requirements

- Where necessary, report incidents to the relevant authorities and cooperate fully with investigations
- Support affected individuals wherever possible, in partnership with appropriate organisations
- Terminate supplier contracts if breaches are substantiated and remediation is not forthcoming

#### **Senior Management:**

- Lead by example in championing ethical procurement and supply chain practices
- Provide adequate resources and support for the implementation and monitoring of this policy
- Review high-risk suppliers and ensure that due diligence is carried out effectively
- Approve and oversee the resolution of any modern slavery or ethical compliance issues

#### **Procurement Staff and Managers:**

- Ensure that procurement processes incorporate ethical criteria, including labour rights, sustainability, and supplier conduct
- Undertake risk assessments and due diligence on suppliers in line with this policy
- Keep accurate records of procurement decisions, supplier assessments, and risk mitigation actions
- Flag any concerns related to supplier behaviour, working conditions, or modern slavery

#### **Suppliers and Contractors:**

- Uphold the standards outlined in this policy and our Supplier Code of Conduct
- Inform Utopian Training Solutions Ltd of any concerns or breaches in ethical or legal practices
- Cooperate with audits, investigations, and information requests related to ethical compliance

#### **To ensure continued alignment with this policy, we will implement a robust monitoring framework that includes:**

- Annual supplier self-assessments to evaluate compliance with ethical standards and labour practices
- Periodic contract performance reviews that assess not only service delivery but also supplier conduct and risk management
- Random spot checks and desk-based audits on suppliers, prioritising those in higher-risk categories
- Internal reviews and staff interviews to assess awareness, training uptake, and policy effectiveness
- Establishing key performance indicators (KPIs) for procurement and supplier diversity, fair trade sourcing, and ethical compliance

**Where non-compliance is identified, we will work with suppliers to develop and implement corrective action plans. Persistent failure to meet our ethical standards may result in suspension or termination of the relationship.**

**We will invest in ongoing training and development to ensure that ethical procurement principles are embedded throughout the organisation. This includes:**

- Induction training for all new staff and associates covering this policy, the Supplier Code of Conduct, and reporting procedures
- Annual refresher training for procurement and management staff on ethical procurement, contract management, and modern slavery awareness
- Dedicated workshops and learning modules for key departments
- Regular updates through internal communications channels, including newsletters and team meetings, to highlight new risks or changes in legislation

**This policy will be reviewed annually by the Compliance and Operations Lead, or sooner if required due to changes in legislation, industry standards, or significant organisational changes. Revisions will be approved by senior leadership and disseminated to all staff and relevant stakeholders.**

Approved by: Edward Hanna

Date: [Insert Date]

Document Control

Policy Owner: Compliance and Operations Lead

Version: 1.04

Next Review:



# Ethical Procurement and Modern Slavery Policy

Utopian Training Solutions Ltd

Effective Date: 01/02/2025

# Policy Overview and Agenda

1

## Policy Purpose

Understanding our ethical procurement framework and modern slavery stance

2

## Core Commitments

Our strategy for sustainability, transparency, and fair supplier relationships

3

## Modern Slavery Approach

Prevention, detection, and response to modern slavery risks

4

## Responsibilities

Role-specific duties for implementation and compliance

5

## Monitoring & Training

How we'll maintain standards and develop staff capabilities

This training will equip you with the knowledge and tools to implement our ethical procurement and modern slavery policy effectively across all business operations, ensuring we meet both legal requirements and our own ethical standards.

# Policy Purpose and Scope

Utopian Training Solutions Ltd is committed to conducting all business with **integrity, transparency, and accountability**. This policy establishes our approach to ethical procurement, fair supplier treatment, and our zero-tolerance stance on modern slavery in accordance with the Modern Slavery Act 2015.

We recognise that our business decisions directly impact people and the environment. Through this policy, we aim to create positive social value while mitigating potential harms throughout our supply chain.

## Implementation Timeline

This policy comes into effect on 1st February 2025 and will undergo a comprehensive review on 1st February 2026. All departments must align their procurement processes with this policy by 1st March 2025.

## Who Must Comply

- All employees, contractors, associates and consultants
- All suppliers, vendors, and subcontractors
- Anyone conducting procurement activities on our behalf

## What Activities Are Covered

- Sourcing and supplier selection
- Contract negotiation
- Supplier performance management
- All goods and services procurement

# The Business Case for Ethical Procurement

Ethical procurement isn't just about compliance—it delivers significant business benefits while aligning with our core values:

- **Risk Mitigation**

Reduces reputational, legal, and operational risks associated with unethical supplier practices or modern slavery in our supply chain

- **Enhanced Brand Value**

Strengthens our reputation with clients who increasingly value ethical business practices and social responsibility

- **Improved Supplier Relationships**

Creates more stable, reliable supply chains through fair treatment and collaborative approaches

- **Compliance Assurance**

Ensures we meet legal obligations under the Modern Slavery Act and other relevant legislation



Ethical procurement builds stronger, more resilient business relationships while protecting vulnerable workers in our supply chain.

# Our Ethical Procurement Strategy



## Transparency

Maintaining open procurement procedures with documented decision-making processes and equal treatment of all bidders

## Integrity

Avoiding corruption, bribery, fraud, or conflicts of interest; requiring declarations of potential conflicts

## Social Value

Prioritising suppliers who demonstrate commitment to community benefit, diversity, fair labour, and environmental responsibility

When implementing this strategy, procurement staff should document how each of these five elements is considered in major purchasing decisions.



# Understanding Modern Slavery

Modern slavery is a serious crime and violation of fundamental human rights. It takes various forms, all involving the deprivation of a person's liberty to exploit them for personal or commercial gain:

## Forced Labour

Work or service extracted under the threat of penalty and for which the person has not offered themselves voluntarily

## Debt Bondage

Workers forced to work to pay off an often-increasing debt that they have no realistic prospect of clearing

## Human Trafficking

Arrangement or facilitation of travel with the intent to exploit, regardless of whether the person consents to travel

## Child Labour

Work that deprives children of their childhood, potential, dignity, and is harmful to physical and mental development



## Key Indicators That May Signal Modern Slavery:

- Workers who appear malnourished, injured, or intimidated
- Workers living in degrading or unsuitable accommodation
- Workers without personal protective equipment or suitable clothing
- Workers with no bank account or whose wages are "managed" by a third party
- Workers who cannot produce their identification documents
- Suppliers with unusually low prices compared to market rates

# Fair Supplier Relationships



## Equitable Treatment

Ensuring procurement opportunities are accessible and inclusive for all potential suppliers, including small and medium enterprises (SMEs).



## Clear Communication

Providing accurate information about requirements, timeframes, and selection criteria to all potential suppliers.



## Prompt Payment

Honouring contractual obligations and paying suppliers within agreed terms (target: within 30 days of valid invoice receipt).



## Open Dialogue

Engaging in constructive communication with suppliers, seeking feedback, and resolving disputes fairly and quickly.



## Supplier Development

Supporting capacity-building, particularly with small, medium, and social enterprises who align with our ethical standards.

Fostering respectful, long-term relationships with suppliers helps build a more resilient supply chain and encourages innovation. Our commitment to fair treatment extends beyond contractual obligations to create genuine partnerships based on mutual respect.

# High-Risk Industries and Regions

When conducting procurement activities, special attention must be paid to industries and regions with higher modern slavery risks. Our risk-based approach requires enhanced due diligence when sourcing from these areas.

## High-Risk Industries Include:

- Textile and garment manufacturing
- Agriculture and food processing
- Construction and building materials
- Hospitality and cleaning services
- Electronics manufacturing
- Mining and raw materials extraction

For the training sector specifically, be vigilant about educational materials, promotional items, catering services, and facility management, as these can connect to high-risk supply chains.



## Higher-Risk Regions:

- Parts of Southeast Asia (particularly manufacturing hubs)
- Certain regions in Africa and South America
- Areas with weak labour protections or enforcement
- Conflict zones and politically unstable regions
- Areas with high levels of poverty and limited economic opportunity

When sourcing from these regions, ensure full visibility of all tiers of suppliers and subcontractors where possible.

# Modern Slavery Prevention Approach



## Due Diligence

Conduct detailed risk assessments on all new suppliers, with enhanced scrutiny for high-risk industries and regions



## Supplier Code of Conduct

Require all suppliers to sign our Code, outlining expectations on modern slavery, human rights, and ethical business practices



## Contract Clauses

Embed modern slavery clauses in all contracts, giving us audit rights and the ability to terminate relationships with non-compliant suppliers



## Reporting Mechanisms

Establish robust channels for reporting concerns, including anonymous whistleblowing procedures for staff and suppliers



## Staff Training

Provide mandatory training to help identify indicators of modern slavery and understand appropriate action steps

This comprehensive approach creates multiple layers of protection against modern slavery entering our supply chain, with each level building upon the previous safeguards.

# Supplier Due Diligence Process



All due diligence records must be maintained in our central procurement system for a minimum of 7 years to ensure auditability and demonstrate compliance.



# Responding to Modern Slavery Concerns

If you suspect modern slavery within our supply chain, follow this response protocol:

1

## Document Concerns

Record specific details, including dates, locations, individuals involved, and indicators observed

2

## Report Internally

Notify the Compliance and Operations Lead within 24 hours via the confidential reporting form

3

## Investigation

A cross-functional team will assess the report and determine appropriate action

4

## Supplier Engagement

If appropriate, engage with the supplier to understand the issue and develop remediation plans

5

## Authority Notification

Where necessary, report to relevant authorities (police, GLAA, Modern Slavery Helpline)

6

## Support Victims

Work with appropriate organisations to support affected individuals



## Important Contact Information:

- Internal Compliance Hotline: 0800-555-1234
- Modern Slavery Helpline: 08000 121 700
- Gangmasters and Labour Abuse Authority: 0800 432 0804
- Crimestoppers: 0800 555 111

Remember: Your prompt action could help protect vulnerable individuals from exploitation. All reports will be handled confidentially, and whistleblowers are protected from retaliation under our Speaking Up Policy.

# Key Responsibilities: Senior Management



Our senior leadership team plays a crucial role in championing ethical procurement practices throughout the organisation. Their visible commitment sets the tone for implementation and compliance at all levels.

## Strategic Direction

Lead by example in championing ethical procurement and supply chain practices, integrating them into business strategy and decision-making

## Resource Allocation

Provide adequate resources, staffing, tools, and training to support the effective implementation and monitoring of this policy

## Risk Oversight

Review high-risk suppliers quarterly and ensure that due diligence is carried out effectively across all procurement activities

## Issue Resolution

Approve and oversee the resolution of any modern slavery or ethical compliance issues that are escalated, ensuring appropriate action is taken

## Accountability

Hold departments accountable for compliance with this policy through regular performance reviews and reporting mechanisms

# Key Responsibilities: Procurement Staff



## Process Implementation

Ensure that procurement processes incorporate ethical criteria, including labour rights, sustainability, and supplier conduct.

Practical steps include:

- Updating RFP/RFQ templates to include ethical criteria and modern slavery questions
- Verifying supplier documentation during selection processes
- Incorporating ethical factors in bid evaluation scoring matrices



## Documentation

Keep accurate records of procurement decisions, supplier assessments, and risk mitigation actions:

- Document justifications for supplier selections
- Maintain audit trails of all due diligence activities
- Ensure all relevant documentation is securely stored and accessible



## Risk Management

Undertake risk assessments and due diligence on suppliers in line with this policy:

- Complete supplier risk assessment forms for all new suppliers
- Conduct enhanced due diligence for suppliers in high-risk categories
- Maintain a risk register of suppliers with mitigation actions



## Vigilance

Flag any concerns related to supplier behaviour, working conditions, or modern slavery indicators:

- Report unusual pricing or delivery patterns that may indicate exploitation
- Document and escalate any refusal by suppliers to provide requested information
- Follow the reporting protocol for any suspected modern slavery issues



# Key Responsibilities: Suppliers

## Core Supplier Obligations

All suppliers to Utopian Training Solutions Ltd must adhere to the following requirements as a condition of doing business with us:

### Code Compliance

Uphold the standards outlined in this policy and our Supplier Code of Conduct, implementing them throughout their own operations and supply chains

### Transparency

Inform Utopian Training Solutions Ltd of any concerns or breaches in ethical or legal practices, whether in their own operations or their suppliers

### Cooperation

Cooperate with audits, investigations, and information requests related to ethical compliance, providing access and documentation as required

### Cascade Requirements

Ensure these ethical standards are passed down to their own suppliers and subcontractors, creating visibility throughout the supply chain



## Supplier Code of Conduct Snapshot

Our Supplier Code of Conduct covers key areas including:

- Legal compliance with all applicable laws and regulations
- Working conditions, health and safety standards
- Prohibition of child labour and forced labour
- Fair wages and working hours
- Non-discrimination and diversity practices
- Environmental responsibility and sustainability
- Business ethics and anti-corruption measures
- Data protection and confidentiality

The complete Code is available on our supplier portal and must be signed annually by all active suppliers.

# Monitoring and Compliance Framework



Our monitoring cycle ensures continuous oversight and improvement. The Compliance and Operations Lead will coordinate these activities and report quarterly to the Senior Management Team on compliance metrics and any significant issues identified.

# Consequences of Non-Compliance

## For Suppliers



## For Employees



The severity of consequences will depend on the nature of the non-compliance, whether it was deliberate or negligent, the potential harm caused, and the response to initial interventions. We aim to be fair and proportionate while ensuring our ethical standards are maintained.

# Training and Development Programme

We will invest in ongoing training to embed ethical procurement principles throughout the organisation. Our comprehensive approach includes:

1	<b>Induction Training</b> <ul style="list-style-type: none"><li>• All new staff and associates</li><li>• Covers policy essentials, Supplier Code, and reporting procedures</li><li>• Completed within first month of employment</li></ul>
2	<b>Annual Refreshers</b> <ul style="list-style-type: none"><li>• Procurement and management staff</li><li>• Focuses on ethical procurement, contract management, and modern slavery awareness</li><li>• Includes case studies and practical scenarios</li></ul>
3	<b>Specialist Workshops</b> <ul style="list-style-type: none"><li>• Targeted to high-risk departments</li><li>• In-depth coverage of relevant risk areas</li><li>• Practical tools and techniques for due diligence</li></ul>
4	<b>Regular Updates</b> <ul style="list-style-type: none"><li>• All staff via internal communications</li><li>• Highlights new risks or legislative changes</li><li>• Reinforces key messages through real examples</li></ul>



## Training Schedule for 2025

February-March	Initial policy rollout sessions for all staff
April	Procurement team specialist training
May	Manager workshops on implementation
June	Supplier engagement sessions
September	Six-month review and refresher
Quarterly	Topic-specific webinars on rotating themes

Training completion will be recorded in our HR system and linked to annual performance reviews to ensure accountability.



# Implementation Toolkit

To support effective implementation of this policy, the following resources are available to all staff:



## Templates & Checklists

- Supplier risk assessment form
- Due diligence questionnaires
- Contract clause templates
- Ethical procurement checklist
- Supplier audit framework



## Digital Tools

- Supplier management database
- Risk assessment calculator
- Compliance tracking dashboard
- Online reporting platform
- Training modules and quizzes



## Guidance Documents

- Detailed implementation guide
- Modern slavery indicators reference
- Industry-specific risk profiles
- Supplier engagement handbook
- FAQ document for common queries

All resources are available on the company intranet under "Ethical Procurement Resources." For assistance with using these tools, contact the Compliance and Operations Lead.

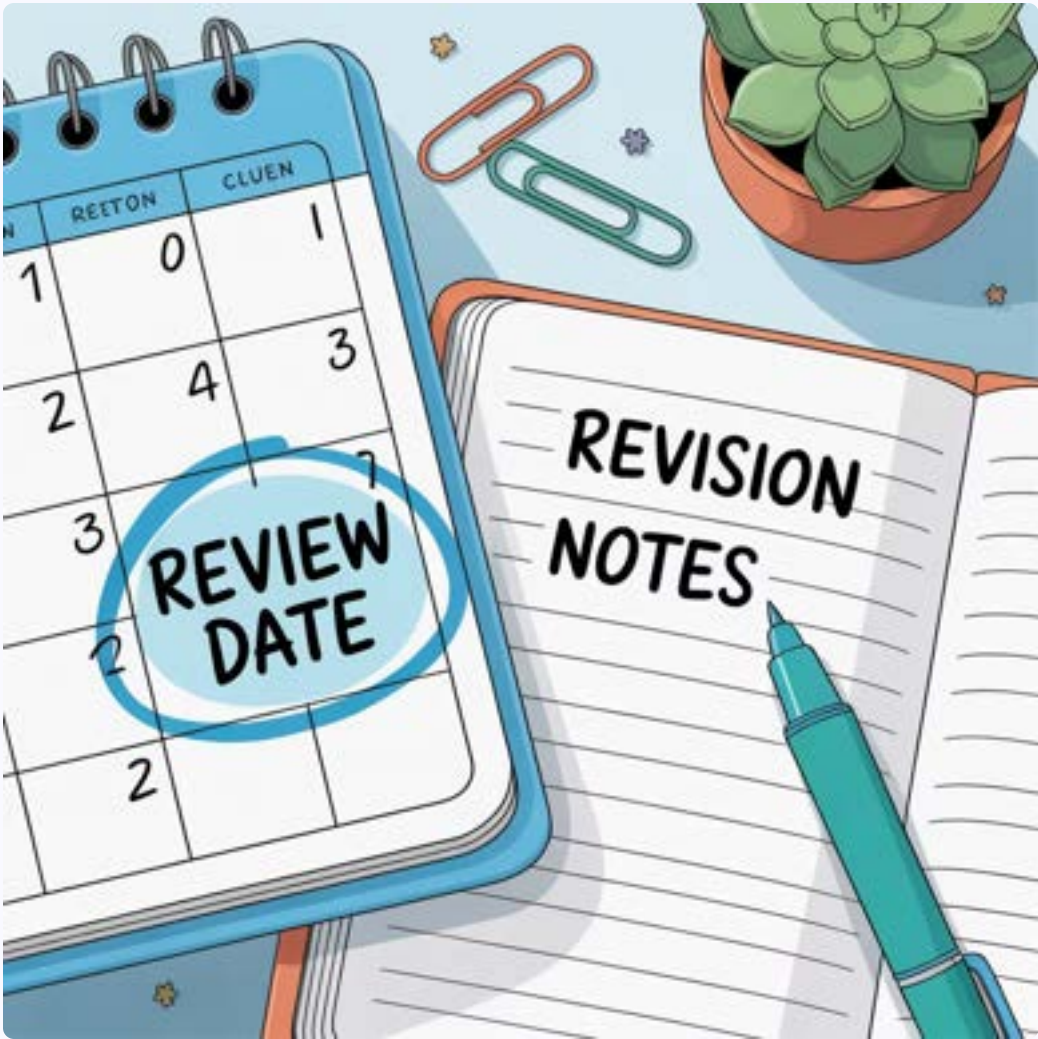
# Policy Review Process

This policy will be reviewed annually by the Compliance and Operations Lead, or sooner if required due to changes in legislation, industry standards, or significant organisational changes.

**The review process will include:**

- Assessment of the policy's effectiveness in preventing modern slavery and promoting ethical procurement
- Evaluation of compliance with relevant laws and regulations
- Analysis of any incidents, concerns, or breaches reported during the period
- Consideration of feedback from staff, suppliers, and other stakeholders
- Benchmarking against industry best practices and standards
- Incorporation of lessons learned and emerging risks

Revisions will be approved by senior leadership and disseminated to all staff and relevant stakeholders through our communication channels.



01/02/2...

**Next Scheduled Review**

Mark your calendars for the comprehensive annual review

30

**Day Response**

Maximum timeframe for policy updates following legislative changes

100%

**Staff Notification**

All employees will receive updated policy communications

# Key Takeaways and Next Steps

## Remember These Principles

- Ethical procurement is a core business value, not just compliance
- Modern slavery risks exist in many supply chains, including ours
- Due diligence is essential before engaging with new suppliers
- Everyone has a responsibility to report concerns
- Fair supplier relationships create long-term business benefits

## Your Next Steps

1. Complete the online training module by 15/02/2025
2. Review and sign the policy acknowledgement form
3. Assess your current supplier relationships against policy requirements
4. Identify any immediate concerns requiring action
5. Schedule team discussions to implement relevant changes

By implementing this policy effectively, we not only comply with legal requirements but also contribute to building a more ethical global supply chain and protecting vulnerable workers from exploitation.



## Support Resources

For assistance with policy implementation or to report concerns:

- Compliance and Operations Lead:  
[compliance@utopiantraining.co.uk](mailto:compliance@utopiantraining.co.uk)
- Ethics Helpline: 0800-555-1234
- Policy Resources: [Internal Portal Link]
- External Support: Modern Slavery Helpline (08000 121 700)

Thank you for your commitment to upholding our ethical standards and helping to create a supply chain free from exploitation.



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**All staff, associates, contractors- Policies for 2025**

---

**From:** Edward Hanna  
**Sent:** 4 February 2025 13:21  
**To:** All Staff  
**Subject:** All staff, associates, contractors- Policies for 2025

Dear All

Please find attached our newly signed off policies and processes for 2025.

The policies contain a range of subject matter issues, internal learning processes, technical delivery and legislative compliance.

All of the relevant training session and presentation can be found on our Thinkific Learning Hub. If you are unable to log in or have forgotten your passwords please let us know.

This will allow us to ensure that everyone has read and watched all relevant training in relation to the updated policies listed below.

If anyone is unsure about anything attached or online, please let me know.

**Internal Learning (OCN Processes)**

- Fair Assessment
- Appeals Procedures
- Contingency Plan
- Complaints Policy
- Disability Discrimination
- H&S
- Internal Quality Assurance
- Internal Quality Verification
- AI & Plagiarism
- Malpractice

**Technical Delivery**



- Registrations
- OfQUAL Processes
- CCEA Essential Skills Regulation Update
- Digital Portfolios
- DFE Funded programmes

## HR & Legislative Compliance

- Data Protection
- Child Protection
- Safeguarding & Vulnerable Adults
- GDPR Compliance
- IR35
- Diversity, Equality & Good Relations
- Section 75- Data Collection
- Health & Safety
- Working on your own policy
- Working from home policy
- Conflict of Interests
- Dress Code
- Ethical Procurement & Contracting Policy
- Behaviour at Work or Representing the company
- IT & Devices policy
- Social Media Policy

Best Wishes

Ed

*Edward Hanna*

CEO

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L: <https://uk.linkedin.com/company/utopian-learning>

F: <https://en-gb.facebook.com/utopianlearningni/>

## **Utopian Training Solutions Ltd**

### **Diversity, Equality, and Good Relations Policy**

Effective Date: 01/02/2025

Review Date: 01/02/2026

#### **Introduction**

Utopian Training Solutions Ltd is committed to creating an inclusive, respectful, and welcoming environment for all employees, learners, clients, and partners. Based in Northern Ireland, we understand the importance of recognising and addressing the region's unique social, cultural, and political context. This policy outlines our commitment to promoting diversity, advancing equality of opportunity, and fostering good relations within and beyond our organisation.

#### **Purpose**

The purpose of this policy is to:

- Promote respect for individual differences and value diversity in all its forms
- Eliminate unlawful discrimination, harassment, and victimisation
- Ensure equal access to opportunities, support, and progression for all individuals
- Foster good relations among people of different backgrounds, beliefs, and identities
- Comply with all relevant legislation, including the Equality Act 2010, Section 75 of the Northern Ireland Act 1998, and good relations duties under public policy frameworks

#### **Scope**

This policy applies to:

- All employees, volunteers, contractors, and consultants of Utopian Training Solutions Ltd
- All learners, programme participants, and clients engaging with our services
- All activities and operations undertaken by or on behalf of the company

#### **Definitions**

- Diversity: The recognition and valuing of difference, including but not limited to age, disability, gender, race, religion or belief, political opinion, sexual orientation, and socio-economic background.
- Equality: Ensuring individuals are treated fairly and have equal access to opportunities and services.
- Good Relations: Promoting mutual respect, understanding, and cooperation between individuals from different community backgrounds, particularly in the context of Northern Ireland's historical divisions.

### **Our Commitments**

Utopian Training Solutions Ltd will:

- Provide a workplace and learning environment free from discrimination, bullying, and harassment
- Implement fair recruitment, selection, and progression practices
- Make reasonable adjustments for individuals with disabilities or specific needs
- Ensure all training content and delivery methods reflect principles of inclusion and cultural sensitivity
- Actively challenge prejudice, stereotyping, and intolerance in all forms
- Foster a culture of openness where individuals feel empowered to express their identity and beliefs safely
- Promote cross-community and cross-cultural engagement where possible

### **Legal and Policy Framework**

We are committed to adhering to the following legislation and frameworks:

- Section 75 of the Northern Ireland Act 1998
- Equality Act 2010 (where applicable)
- Fair Employment and Treatment (NI) Order 1998
- Race Relations (NI) Order 1997
- Disability Discrimination Act 1995
- Good Relations duty in line with public sector equality guidance

## **Roles and Responsibilities**

Senior Leadership:

- Lead on the implementation and promotion of this policy
- Monitor organisational performance against diversity and equality goals
- Ensure compliance with legal and ethical obligations

All Staff and Representatives:

- Treat colleagues, learners, and stakeholders with dignity and respect
- Participate in training and development on diversity and equality
- Report concerns, incidents, or breaches of this policy in line with our grievance procedures

HR and Compliance Team:

- Maintain records and provide guidance on the application of this policy
- Respond promptly and confidentially to complaints or breaches
- Ensure recruitment, learning delivery, and progression processes are fair and inclusive

## **Monitoring and Review**

We will regularly monitor:

- Workforce and learner demographics
- Complaints and feedback related to discrimination or bias
- Representation and progression of under-represented groups
- Community engagement and good relations outcomes

This policy will be reviewed annually or in response to legislative or operational changes.

Approved by: [Insert Name – Managing Director or Board Representative]

Approved by: Edward Hanna Date:

Document Control Policy Owner:

Compliance and Operations Lead Version: 3.01



# Diversity, Equality, and Good Relations Policy

A comprehensive policy framework for Utopian Training Solutions Ltd, effective 01/02/2025

# Policy Overview & Purpose

## Respect Diversity

Recognise and value individual differences in all forms, creating an environment where everyone feels welcomed and appreciated.



## Advance Equality

Eliminate unlawful discrimination, harassment, and victimisation whilst ensuring equal access to opportunities for all.



## Ensure Compliance

Adhere to all relevant legislation including Section 75 of the Northern Ireland Act 1998 and the Equality Act 2010.



## Foster Relations

Build positive relationships between people of different backgrounds, particularly within Northern Ireland's unique context.



This policy establishes a framework to guide all interactions within Utopian Training Solutions Ltd, responding directly to Northern Ireland's distinct social, cultural, and political environment while maintaining the highest standards of ethical conduct across all operations.

# Policy Scope & Definitions

## Who Does This Policy Apply To?

### Employees & Associates

All staff members, volunteers, contractors, and consultants working with or for Utopian Training Solutions Ltd.

### Learners & Clients

All individuals participating in our training programmes, courses, or accessing our services.

### Operational Activities

All activities, events, and operations undertaken by or on behalf of the company, both internally and externally.

## Key Definitions

**Diversity:** The recognition and valuing of difference across dimensions including age, disability, gender, race, religion, political opinion, sexual orientation, and socioeconomic background.

**Equality:** Ensuring individuals are treated fairly and have equal access to opportunities, support, and services without discrimination.

**Good Relations:** Promoting mutual respect, understanding, and cooperation between individuals from different community backgrounds, particularly within Northern Ireland's historical context.

These definitions form the foundation of our approach and should be understood by all stakeholders to ensure consistent application of this policy.



# Our Organisational Commitments

## Safe & Inclusive Environment

We commit to providing workplaces and learning environments that are free from discrimination, bullying, and harassment in all forms. This includes implementing appropriate reporting mechanisms and responding promptly to concerns.

## Inclusive Content & Delivery

All training materials, content, and delivery methods will reflect principles of inclusion and cultural sensitivity. This includes using diverse examples, accessible formats, and language that respects all identities.

## Fair Practices & Accessibility

We will implement transparent recruitment, selection, and progression practices that promote equal opportunity. We also commit to making reasonable adjustments for individuals with disabilities or specific needs to ensure equal access to our services and facilities.

## Cross-Community Engagement

We will actively promote cross-community and cross-cultural engagement in our programmes, recognising Northern Ireland's unique societal context and the importance of building understanding across traditional divides.

# Legal & Policy Framework

## Key Legislation

- Section 75 of the Northern Ireland Act 1998
- Fair Employment and Treatment (NI) Order 1998
- Race Relations (NI) Order 1997
- Disability Discrimination Act 1995
- Equality Act 2010 (where applicable to operations outside Northern Ireland)
- Good Relations duty in line with public sector equality guidance

This legislation collectively establishes our legal obligation to promote equality of opportunity and good relations, prevent discrimination, and ensure accessible services for all protected characteristics.



As a training provider operating in Northern Ireland, we have specific obligations under Section 75 of the Northern Ireland Act 1998, which requires public authorities to promote equality of opportunity and good relations between persons of different religious belief, political opinion, and racial group.

While Utopian Training Solutions Ltd is not a public authority, we embrace these principles as best practice and as part of our commitment to serving diverse communities in Northern Ireland.

# Roles & Responsibilities



## Senior Leadership Team

- Set the organisational tone and culture regarding diversity and inclusion
- Allocate appropriate resources for policy implementation
- Review equality monitoring data and address identified issues
- Ensure all strategic decisions consider equality implications
- Lead by example in promoting good relations across communities



## All Staff & Representatives

- Treat all colleagues, learners and stakeholders with dignity and respect
- Participate in required diversity and equality training
- Challenge inappropriate behaviour and report concerns
- Consider equality implications in day-to-day work
- Actively contribute to a positive and inclusive environment



## HR & Compliance Team

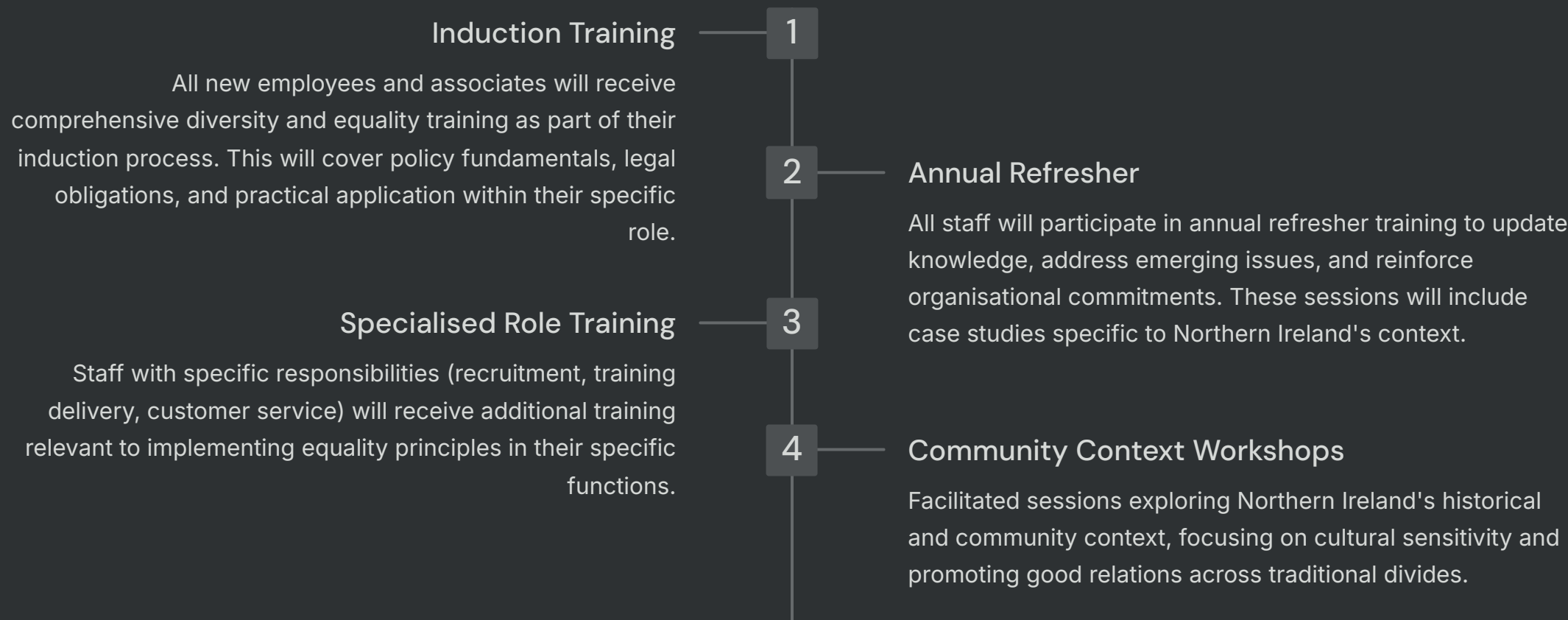
- Coordinate equality monitoring and reporting
- Provide guidance on policy application
- Handle complaints confidentially and sensitively
- Ensure fair recruitment and progression processes
- Maintain relevant documentation and evidence of compliance

The effective implementation of this policy relies on everyone understanding their responsibilities and actively contributing to our diversity, equality and good relations objectives.

# Staff Training Programme

## Comprehensive Training Approach

To ensure effective implementation of our Diversity, Equality, and Good Relations Policy, Utopian Training Solutions Ltd will deliver a structured training programme for all staff and associates. This training is mandatory and designed to build both awareness and practical skills.



# Training Content & Delivery Methods

## Core Training Modules

### Legal Framework

Understanding Section 75, equality legislation, and legal obligations in the Northern Ireland context, with practical case studies and scenarios.

### Unconscious Bias

Recognising and mitigating personal biases in decision-making, interactions, and service delivery through self-reflection exercises.

### Cultural Competence

Building skills for working effectively across cultural differences, with specific focus on Northern Ireland's diverse communities.

### Inclusive Communication

Developing language skills that respect all identities and learning how to challenge inappropriate language constructively.

## Delivery Methods

- **Interactive Workshops:** Facilitated discussions and group exercises to explore complex issues in a safe environment
- **E-Learning Modules:** Self-paced online training with assessments to verify understanding
- **Case Study Analysis:** Examination of real-world scenarios relevant to Northern Ireland's training sector
- **External Speaker Sessions:** Insights from community representatives and equality experts
- **Reflective Practice:** Structured opportunities to apply learning to day-to-day work situations

All training will incorporate assessment methods to verify understanding and application, with certification provided upon successful completion.

# Practical Implementation Guide

## Recognise Potential Issues

Learn to identify situations where discrimination, bias, or inequality might occur in your daily work. This includes recognising less obvious forms of exclusion such as:

- Use of jargon that excludes certain groups
- Scheduling that disadvantages those with caring responsibilities
- Cultural references that may alienate those from different backgrounds
- Physical environments that present barriers to participation

## Take Appropriate Action

Develop skills to address issues effectively:

- Use the "challenge with respect" approach when addressing problematic behaviour
- Follow the THINK model: Is it True, Helpful, Inspiring, Necessary, Kind?
- Know when and how to escalate concerns through proper channels
- Document relevant incidents appropriately

## Promote Good Practice

Actively contribute to an inclusive environment by:

- Using inclusive language in all communications
- Ensuring diverse representation in training materials
- Making reasonable adjustments proactively
- Seeking feedback on accessibility and inclusion

This practical guide provides staff and associates with concrete steps to implement policy principles in everyday situations. It transforms abstract commitments into actionable behaviours that support our equality objectives.



# Monitoring & Evaluation

## What We Monitor

4

### Quarterly Reports

Comprehensive equality reports reviewing key metrics across all operations

9

### Protected Characteristics

Tracking representation across different demographic groups

100%

### Training Completion

Target for staff completion of equality and diversity training

Our monitoring framework includes both quantitative and qualitative measures to provide a comprehensive picture of our performance against equality objectives.

## How We Use the Data



The data collected through our monitoring processes is used to:

- Identify potential barriers or areas of inequality
- Track progress against our equality objectives
- Inform future policy development and training needs
- Provide evidence of compliance with legal obligations
- Demonstrate our commitment to continuous improvement

Reports are reviewed quarterly by the Senior Leadership Team with actions assigned to address any identified issues or concerns.

# Supporting Resources for Staff & Associates



## Policy Toolkit

A comprehensive resource containing detailed guidance, templates, checklists, and practical examples to support policy implementation. Available on the company intranet and in print format upon request.



## FAQ Database

Searchable collection of frequently asked questions and answers about applying equality principles in specific situations, addressing common scenarios staff may encounter in the Northern Ireland training context.



## Confidential Advisory Service

Access to trained equality advisors who can provide confidential guidance on complex situations. Available via appointment, telephone, or secure messaging system for all staff and associates.



## Community Calendar

Interactive calendar highlighting significant cultural and religious dates relevant to Northern Ireland's diverse communities. Includes guidance on appropriate acknowledgement and accommodation.



## Video Library

Collection of instructional videos demonstrating good practice in applying equality principles, featuring scenarios specific to training delivery in Northern Ireland's context.



## External Networks

Information on local and national equality networks, community organisations, and professional groups that staff can engage with for additional support and development.

These resources are designed to provide ongoing support beyond formal training sessions, enabling staff and associates to access guidance when they need it most.



# Key Takeaways & Next Steps

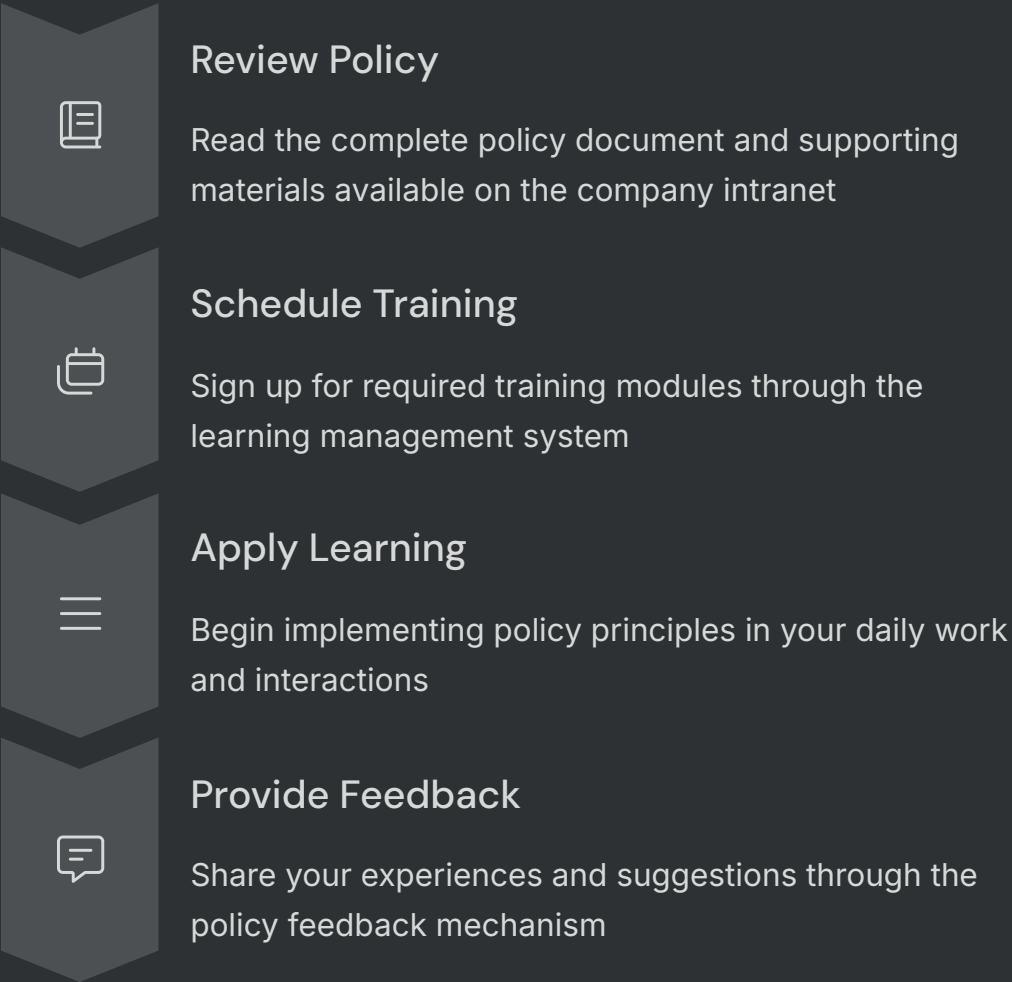
## Policy Summary

Our Diversity, Equality, and Good Relations Policy establishes a comprehensive framework for creating an inclusive environment that values diversity, advances equality, and fosters positive relationships across communities.

The effective implementation of this policy relies on:

- Clear understanding of legal and ethical obligations
- Consistent application across all operations
- Personal commitment from all staff and associates
- Ongoing training and skill development
- Regular monitoring and continuous improvement

## Next Actions for Staff & Associates



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**All staff, associates, contractors- Policies for 2025**

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All of the relevant training session and presentation can be found on our Thinkific Learning Hub. If you are unable to log in or have forgotten your passwords please let us know.

This will allow us to ensure that everyone has read and watched all relevant training in relation to the updated policies listed below.

If anyone is unsure about anything attached or online, please let me know.

**Internal Learning (OCN Processes)**

- Fair Assessment
- Appeals Procedures
- Contingency Plan
- Complaints Policy
- Disability Discrimination
- H&S
- Internal Quality Assurance
- Internal Quality Verification
- AI & Plagiarism
- Malpractice

**Technical Delivery**

- Registrations
- OfQUAL Processes
- CCEA Essential Skills Regulation Update
- Digital Portfolios
- DFE Funded programmes

## HR & Legislative Compliance

- Data Protection
- Child Protection
- Safeguarding & Vulnerable Adults
- GDPR Compliance
- IR35
- Diversity, Equality & Good Relations
- Section 75- Data Collection
- Health & Safety
- Working on your own policy
- Working from home policy
- Conflict of Interests
- Dress Code
- Ethical Procurement & Contracting Policy
- Behaviour at Work or Representing the company
- IT & Devices policy
- Social Media Policy

Best Wishes

Ed

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