Working with industry experts to enhance knowledge, Improve Safety, develop skills, and deliver the services you require Nationwide.

Health and Safety Management

(An incorporation of Policies and Procedures).

*Upskilling and Improving Knowledge in your Industry

*Safety Audits & Consultations. *Health & Safety Packages.

*National Voccational Qualifications (NVQ'S)

Pennine Training Hub LTD.

Grasmere Block,
Building 2 & 3.
Newton Rigg.
Penrith.
CA110AH
Tel: 01768 209 800
Email: info@pthub.uk, accounts@pthub.uk
Website:

Pennine Training Hub, Health and Safety Policy Statement.

Pennine Training Hub LTD, Considers the Health & Safety of all employees, contractors, trainees, and customers (including apprentices) to be of primary importance to the well-being of the business and it is a continuing aim to make the Company a safe and healthy place in which to work and be trained.

Compliance with current health and safety legislation is essential to the way the company operates its health and safety management system.
It is the duty of the company to ensure that the director and management take ownership of health and safety matters and that the company provide safe systems of work, training, and a clean and healthy working environment within the structure of the business .

The company will ensure that the health and safety policy, organisation and arrangements, which reflect the directors commitments are continually monitored and revised where necessary to improve our safety standards. In its commitment to prevent injury and ill health to employees, learners (including apprentices), contractors and others affected by day-to-day operations, and in striving for continual improvement of the Health and Safety Management System, the Company sets annual objectives and targets against which its performance is monitored.

The company and management will provide effective facilities for consultation between management and employee representatives when on company site/sites.
Clients/Principle contractors will provide welfare facilities, plant and a safe environment when working on their sites, unless otherwise agreed in writing beforehand.

All employees, Contractors and trainees have equal opportunity to address safety problems and health related matters with myself or a representative of the Company.
We recognise the need to conduct the business in a manner that is in line with current legislation and codes of practice and will ensure that appropriate arrangements are in place to comply with all legislative duties and any other requirements.

It is the duty of employees and contractors to assist the organisation in the attainment of its Health and Safety objectives. The organisation expects employees and contractors to take reasonable care of their own health, safety, and welfare and that of others who may be affected by their actions.

Directors Statement.

- I fully acknowledge my legal responsibility as the Director with responsibility to implement this document and policies within this company.

Name: Daniel Bistacchi. **Signature:** **Date:** 05/04/2026

Contents.

1, Introduction:

Section 2 (3) of the Health & Safety at Work Act 1974 states:

"Except in such cases as may be prescribed, it shall be the duty of every employer to prepare and as often as may be appropriate revise a written statement of his general policy with respect to the health and safety at work of his employees and the organisation and arrangements for the time being in force for carrying out that policy, and to bring the statement and any revision of it to the notice of his employees". (Please see para 10). Regulation 4 of the Management of Health and Safety at Work Regulations restates the above requirements as part of a company management system.

Regulation 3 (1) of the Management Regulations requires every employer to make a suitable and sufficient assessment of:

a) The risks to the health and safety of his employees whilst they are at work; and
b) The risks to the health and safety of persons not in his employment arising out of or in connection with the conduct by him of his undertaking.

Regulations also require:

i) The employer to designate competent personnel to take charge of health and safety activities or to use outside agencies.
ii) The employer to provide for first-aid, fire, and emergency arrangements.
iii) The employer to provide information and training for employees and to consult worker's representatives on health and safety matters and
iv) Employees to take care of their own and others safety and to co-operate with their employer.

NOTE

The Health & Safety (Training for Employment) Regulations extend the Health and Safety at Work Act to cover people provided with "relevant training" which is defined as "work experience" provided pursuant to a training course or programme, or training for employment, or both" i.e., all people receiving training or work experience from an employer in the workplace are deemed to be employees for the purposes of health and safety legislation. All staff are Health and Safety trained during their induction by the Assistant Training Manager and receive a level 1 Heath and Safety certificate. The training covers a full breakdown of the Health and Safety Policy, including their associated roles and responsibilities to ensure it is effectively implemented. This includes display screen equipment, PPE, COSHH, PUWER, Risk assessment, near miss/accident reporting, RIDDOR etc. Refresher training takes place annually at the December all staff meeting and via, a minimum of 2 x Health and Safety toolbox talks for emerging issues. Training includes a full breakdown of this Health and Safety policy, including staff responsibilities to ensure it is effectively implemented.

The Safe Learner

Pennine Training Hub LTD, is totally committed to the concept of the "safe learner" and makes every effort to translate the concept into practical applications for the learner.
This is achieved by focusing the effort in the "transfer" stage where information/training is being delivered to the learner.
This is typically with the tutors in the 'training centre'/Place of work, and through the supervisor in the workplace. Intervention at this level is liable to have the most significant impact.
The focus is on instilling in the individual learner a sense of responsibility for self, and others, and providing a supportive atmosphere for learners to encourage the appropriate development of the individual's skills.

Pennine Training Hub LTD, current health and safety objectives are:

- Regular review of resources.
- Regular meetings with contractors/colleagues to flag concerns and issues.
- Refresh health and safety /induction training during all meetings to ensure best practices are kept.
- Carry out regular Toolbox Talks
- Promote this policy by Issuing a copy of this Policy to all staff, learners, and contractors during the induction process. Ensuring it is readily accessible by displaying the Policy on notice boards.
- Including Health and safety as a standard agenda item in all meetings.
- Communicating all changes/ updates to the policy via email to current employees/Contractors.
- Promote a friendly, equal, and safe environment for all personnel.
- Ensure all representatives of the company know and understand our policies.

2. ROLES AND RESPONSIBILITIES.

Pennine Training Hub management have the responsibility for maintaining safety and occupational health and will ensure that an effective policy is maintained to prevent injuries, loss, or damage to property, of risks to persons, whether employed or not, but affected because of Company activities.

Company management and directors, will ensure that all employees, Contractors, and trainees fulfil their responsibilities and as far as is reasonably practicable, ensure that no impediment exists to prevent the fulfilment of this obligation. He will also initiate actions to ensure the elimination or reduction of risks to safety and health.

In its commitment to prevent injury and ill health to employees, contractors and others affected by day-to-day operations, and in striving for continual improvement, management set annual objectives and targets against which its performance is monitored.

DESIGNATED COMPETENT PERSON.

The company directors, will act as a 'Competent Person' who will be responsible for developing, communicating, and implementing a cost effective, strategic safety programme for the Company as a whole.

The designated 'Competent Person' will co-ordinate activities relating to safety at all work locations within the Company and monitor standards achieved by regularly auditing for safe systems of work and recording the results of such audits.

Until notified otherwise, the 'Competent Person' will be the holder of the post of "Health and Safety Officer." Annual reviews shall be taken out by an independent health and safety advisor to ensure best practices and standards are maintained. In the absence of the Training Manager Paul Bistacchi will assume overall responsibility for Health and Safety matters.

General Health and Safety information can be sourced at www.hse.gov.uk.

Company Managers.

Company Managers will communicate between external contractors, and the Director. The company manager will ensure that all paperwork is correct and that contractors are assigned the correct work and are briefed with the tasks they are assigned to. The company manager will ensure that all contractors working on his instruction are familiar with the company practices and procedures and immediately report any issues with the Director. The company Finance manager will also be responsible for uploading NPORS paperwork, Filing in the necessary place and the postage of candidates Cards/Certificates and general administration.

Instructors, Employees and Contractors (Inc Trainees).

Instructors, have responsibility for their own safety and occupational health as well as that of the trainees, for whom they are responsible and for the safety and loss prevention activities relating to all facilities entrusted to their care as laid down in their job description.

Instructors are responsible for developing suitable programmes to encourage safety awareness and ensuring compliance of all personnel, including on site contract personnel with Company safety principles, standards and policies as laid down by Pennine Training Hub. Specifically, they must ensure:

- That any equipment being used is checked before the task is carried out and has a valid Report of thorough examination.
- That each trainee is given sufficient information at the start of any training course about company policies and housekeeping rules.
- That each trainee is competently and adequately supervised and provided with experience and training necessary to undertake their appointed tasks safely.
- That trainees in their charge are given sufficient time and resources to undertake practical tasks safely and efficiently.
- That adequate, competent qualified supervision is provided for ALL jobs.
- That the procedure to be used for each task is adequately thought out, hazards identified, and appropriate safety precautions taken, and the procedure effectively communicated to the operators.
- That equipment and facilities are kept in a safe condition and any faults reported.
- Not start a task without the relevant Risk Assessments and method Statements (RAMS) being in-place, read, understood, and signed.

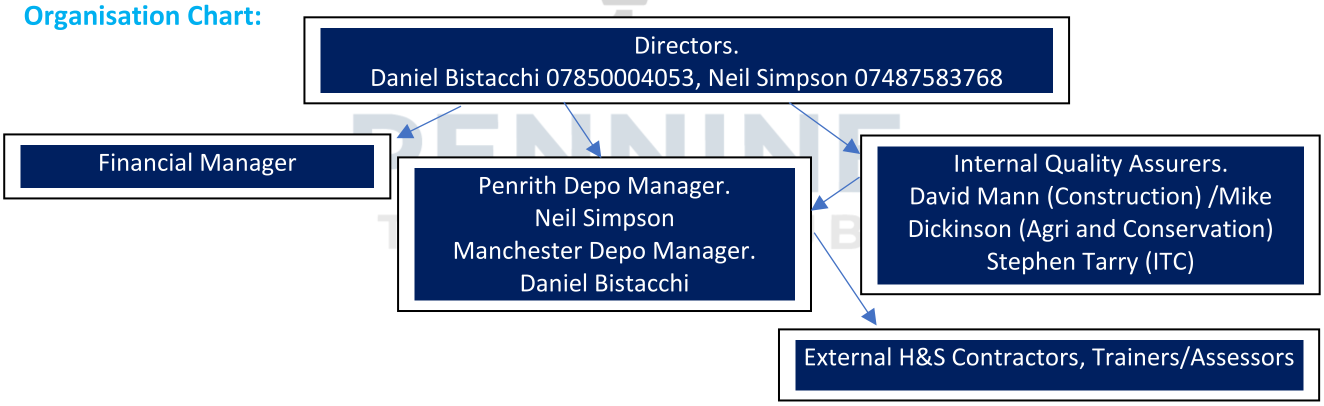
- Ensure that correct PPE is always worn, relevant to the task they are preforming, in accordance with the provided risk assessment.
- Not tamper with or use equipment without authorisation.
- Complete Daily Checks on any company vehicles/Plant
- Ensure all plant is suitable for the task, ensuring it has a thorough examination report.
- Isolate, Tag and Report any Defective Items
- Not use and report defective plant or vehicles Immediately to Daniel Bistacchi or Paul Bistacchi.
- When visiting other sites Ensure they visit the site office before entering, Sign in and receive a relevant induction.
- Report any incidents or near misses to the relevant site management for review.
- That equipment supplied to the trainees is carefully selected, used, and maintained to allow safe completion of the work.
- That all the above apply when personnel or trainees are working away from their normal place of work.
- When visiting another company's site, they are bound by the safety requirements existing at that site i.e., booking in and out, speed limits, parking restrictions, loading, and unloading of goods, emergency procedures, smoking etc.
- The company has a designated Internal Quality Assurer who is totally independent, (Construction Card Management, Mr David Mann, and Carlton Moor Range Mr Michael Dickinson) who will ensure that standards are maintained.

Pennine Training Hub management are responsible for the initial appraisal, on-going monitoring and visit recording of all placement providers.

Internal Quality Assurer:

David Mann is the IQA for the construction side of the company and Michael Dickinson is IQA for conservation/Agriculture. The IQA will carry out audits on paperwork and Training programs to ensure it complies with external requirements, they will also ensure that instructors/Assessors are being diligent and undertaking their job role correctly.

Organisation Chart:



3. First Aid

All employees/contractors of Pennine Training Hub LTD, must hold a Valid first aid certificate, and carry first Aid boxes in vehicles when visiting sites. First Aid boxes must comply with British Standard (BS) 8599 and be adequately stocked for people under the company's care.
All employees/ Contractors must ensure if they have used a company first aid box, it is restocked with the relevant item once it has been used and inform relevant management.

First-aiders are responsible for providing first aid to injured personnel until more medically qualified personnel arrive. In the event of any incident resulting in the necessity to provide 'first-aid', the Tutor/Instructor in charge should direct injured personnel to the trained first aiders – A list of first aiders is at each first aid location.

The Manager/instructor in charge will enter details of the treatment given and action taken in the Accident Book. The designated 'Competent Person' is responsible for the maintenance of first-aid boxes, and these shall be inspected on a regular basis.

4. RISK ASSESSMENTS, COSHH & COSHH RECORDS.

Assessments of risks in each work situation/area will be conducted by nominated competent staff members who will submit their written reports to the relevant Manager for further discussion and the implementation of any necessary action.

All risk assessments and Method Statements must be read, signed, and understood before work commences for each task. All members of staff acting on behalf of Pennine Training Hub must work to provided RAMS and should any issues arise, stop work, and report the issue for review.

4.B COSHH:

The designated 'Competent Person' will be specifically responsible for the recording of risks associated with hazardous substances. No fuels and Lubricants are to be handed without relevant PPE, safety data sheets are stored in the office and relevant risk assessments must be signed and understood before handling any hazardous substances.

All hazardous substances are to be stored in accordance with relevant COSHH legislation.

5. STAFF MEETINGS.

Regular staff meetings will be conducted and will include 'Health and Safety and Welfare at Work' as an agenda, to promote a safer and happier working environment. Where necessary any member of staff should discuss important matters with Management without waiting for the next meeting.

Learners should discuss any issues during their workplace review or urgent matters immediately with their tutor.

6. MANUAL HANDLING.

The Manual Handling Operations Regulations 1992 (as amended), and SG6: Current Edition requires employers to avoid manual handling operations and where they can not be avoided to assess the risk of injury to establish control measures to reduce those risk as low as reasonably practicable.

Where possible lifting equipment should be used to facilitate lifting. Where this is not possible correct lifting techniques must be adopted. No one should attempt to lift anything, which is above his or her capabilities.

Conducting a manual handling assessment

When assessing the manual handling risk, you need to consider the distinctive characteristics that make up the activity.

The areas to consider are the:

- Task
- Individual
- Load and Environment

7. PERSONAL PROTECTIVE EQUIPMENT (PPE).

All Personal Protective Equipment (PPE) purchased must meet the necessary European standards and carry the CE/UKCA mark.

The risk assessment process together with the client arrangement (i.e., Site rules, permit to work system etc) should identify a requirement for PPE. Personal protective equipment will only be specified as a last resort in the hierarchy of controls.

An assessment of the PPE must be conducted as required by the Personal Protective Equipment Regulations 1992 to ensure the correct selection and suitability for the user.

Employees have a statutory duty to use PPE provided as part of a safe system of work and not misuse or interfere with it.

All new employees shall receive a full issue of PPE when they commence employment, if any item of PPE required is missing, expired, damaged or defective then it shall be replaced upon request. A record of all PPE issued must be maintained, signed for by the recipient.

No charge can be made to employees for the issue of PPE.

All sub-contractors working for the company will be issued with a company harness, lanyard, and safety step.

Examples of PPE REQUIRED (as per risk assessment):

- **Safety Helmet 4 Point ARESTA Plus multi-Vented Safety Helmet** EN12492.
- **Safety Boots** EN20345-S3
- **Gloves** EN388

- **Safety Glasses** EN166-1F
- **Impact Goggles** EN166-1B
- **Hi Vis Vest/Jacket** EN471 Class 2
- **Ear Plugs/Defenders** EN352-2
- **Safety Harness** EN361
- **Dust Mask.** All dust masks be FFP3 masks.

8.Noise.

The Control of Noise at Work Regulations 2005 requires a risk assessment to be made, to ascertain the noise levels employees are exposed to, establishing, and implementing precautions to avoid or protect against excessive noise levels.
The Regulations require all exposure to noise to be reduced as far as is reasonably practicable and specifies the following action levels: -

- First action level 80dB(A) exposure should be reduced below this level and hearing protection must be provided if required.
- Second action level 85dB(A) exposure must be reduced below this level and hearing protection zones created where hearing protection must be worn.

As part of the assessment, a competent person using specialist equipment, usually the appointed person must measure noise exposure. The noise exposure is calculated over an equivalent eight-hour shift known as the Lep'd. Engineering solutions must be considered as the first line of control. When the adoption of reasonable engineering or management control fails to reduce the exposure to an acceptable level, only then will we resource to the use of Personal Protective Equipment.
All noise assessments will be reviewed periodically and if the process changes (i.e. new plant and equipment). Noise exposure shall be considered during the selection of new plant and equipment.
Each individual employee has a right to ask the company to undertake a noise assessment if the individual feels they are being exposed to noise levels that may cause a problem to the individual's health. The findings of such assessments would be communicated to all employees of the company.

9. WORKSHOP/TRAINING EQUIPMENT.

The Manager will ensure that arrangements are in place to comply with current legislation for the maintenance and inspection of workshop equipment. Appropriate training will take place with employees (including trainees/learners) before the use of equipment, and relevant RAMS must be understood and signed.
All operatives of workshop equipment must be trained familiar and competent in its uses, and carry out pre operational checks. Defective equipment must not be used and it must be isolated and issues reported to relevant management and supervisor, It must not be used until it is repaired.

10. PLANT OPERATIONS AND VEHICLE MOVEMENTS.

10, A Plant Operations

Plant will only be operated by Staff/Contractors who are authorised to do so, before any plant operations take place relevant rams must be signed and understood and only trained and competent with a Valid qualification, recognised by build U.K. may use plant.

It is the responsibility of the company to ensure any hired or owned machinery is maintained and serviced as recommended by the manufacturer.

When visiting sites, it is the duty of all staff members to ensure all plant being used for the task complies with Current Lifting Operations and Lifting Equipment Regulations 1998 (LOLER) and Provision and Use of Work Equipment Regulations1998 (PUWER) legislation (and has a current Valid repot of thorough examination). Any defective equipment must not be used and reported to relevant supervisor/manager.

When conducting plant operations on sites all staff members/Contractors must always consider site hazards including ground conditions, Excavations, Noise, traffic, Weather, pedestrian routes, and overhead obstructions/Electric cable etc, and obey other site-specific Rules and risk assessments if visiting other sites.

When training on a clients sites using a clients Equipment it is solely the clients responsibility to provide suitable and safe equipment with relevant documentation, under these circumstances it is also the clients responsibility to provide a safe area for work/training to proceed, and inform us of any hazards and issues before work commences under CDM 2015 regulations, it is the instructors responsibility to verify this before the course commences, However our company will inform the client of there responsibility's in advance.
If the client does not adhere to this, the course/work will cease to progress, and full value of the course agreed is liable to the client.

All Items of Plant and its accessories must be operated in accordance with manufacturer's instructions and must not be operated if the operator is under the influence of Drugs, Alcohol or other substances that may affect their ability to operate plant safely. Operator's manuals must be readily available.

It is the company's obligation to ensure any plant supplied by us complies with current LOLER and PUWER Legislation and has a valid Thorough Examination Certificate, it the operator's responsibility to conduct daily checks, report any defects immediately, and grease the machine to manufactures specification.

When Trainees are undergoing training/testing, The instructor MUST work in designated testing area, brief candidates, check machine prior to use (DO NOT USE DEFECTIVE EQUIPTMENT) and ensure that candidates are briefed on the relevant Risk Assessment and are constantly monitored.

Traffic Routes.

Traffic routes will allow the safe movement of persons and vehicles within the workplace and when entering or leaving it. Appropriate measures may include clearly marked separate routes for pedestrians and vehicles; fitting reversing alarms to vehicles, the appointment of competent vehicle Marshals to supervise safe movement of vehicles; display warning signs to alert drivers to restrictions in force; setting speed limit for vehicles and installing road humps, warning indication of height limitations or obstructions; use of one-way systems for vehicles. wearing of high visibility clothing.

10, B COMPANY VEHICLES.

Any member of staff/Contractor driving a Company vehicle will first have to provide a Full and valid Driving Licence and allow licence checks via online database every 6 Months, to ensure all convictions and endorsements (Current or prior) are declared to the insurance. All staff/Contractors must also declare any previous criminal convictions.

Only drivers with the permission of a company Manager can drive a company vehicle, and a company vehicle policy must be signed.

It is the company's obligation to ensure all vehicles are serviced and maintained as per manufacture recommendation and kept Taxed, insured and has a current MOT, however it is the drivers responsibility to carry out daily checks of vehicles including tyre ware, Fluid levels, and road worthiness and any defects are reported immediately.

There is a strict no smoking and no mobile phone policy in all vehicles and drivers must keep their vehicles clean and tidy.
Drivers must not drive if under the influence of drugs, alcohol or any other substances that may their ability to drive safely.

11. LIFTING OPERATIONS.

All lifting operations must have relevant planning, and RAMS, prior to the time and must not commence unless a lift plan by an Appointed person has been prepared. All lift equipment must be visually checked for defects prior to the lift and findings recorded on supplied lift accessory daily inspection sheet.
All lift accessories must have a valid thorough examination certificate and be suitable for the task.

All lift equipment must be visually checked by a competent person prior to work/Teaching commences, and be equipped with RCI, SWL and correct Lift Chart, along with a valid thorough examination certificate.
All lifting operations must comply with current legislation.
23/08/2024 Version1

12, EXCAVATIONS.

Excavations are a very hazardous area in the construction industry, therefore when conducting excavations, a ground survey must be carried out by a competent person to reveal any underground hazards and relevant Rams must be in place prior to work being carried out. All excavations must be cordoned off to prevent unauthorised access, and where necessary correct methods of ground/trench support used. Excavations must always be backfilled with suitable materials and compacted in relevant layers, using appropriate equipment and methods, if leaving an excavation open the area must be secured and barriered off to prevent unauthorised access .
When visiting contractor's sites, it is their responsibility to provide a ground survey and provide a safe area to work/ Train. When undertaking Excavator training the trench depth should be no more than 1 meter deep, all trenches excavated on behalf of the company must comply with current health and safety regulations and adequate trench support in place, the instructor/manager must receive permission by the site to carry out excavating duties.
23/08/2024 Version1

13, WORKING AT HEIGHT.

The Company are aware that works undertaken by the Company and appointed Sub-Contractors may include tasks which will include working at height. To control these risks the company will implement the following procedures and practices:

The company will ensure that: Works will not be conducted at height if the works can be carried out safely otherwise than at height.
Where works are conducted at height the company will take suitable and sufficient measures to prevent, so far as is reasonably practicable, any person falling a distance liable to cause personal injury. To which:

- All work at height is carefully planned and organised.
- Those involved in work at height are competent and must be always supervised.
- The risks from work at height are assessed and appropriate equipment is selected and used.
- The risks from fragile surfaces are properly controlled.
- Equipment for work at height is thoroughly inspected and maintained by the company.
- Operators are to do a visual inspection of harnesses daily and not use defective harnesses; operators must not use any other harness that has not been supplied/authorised by the company.

Every parapet, rail, or other such fall protection measure of every place of work at height is checked on each occasion before the place is used.
To control the hazards presented by the Working at Height Environment. To which: Every existing place of work or means of access or egress at height will:

- Be stable and of sufficient strength and rigidity for the purpose for which it is intended to be or is being used.
- Where applicable, rest on a stable, sufficiently strong surface.
- Be of sufficient dimensions to permit the safe passage of persons and the safe use of any plant or materials required to be used and to provide a safe working area having regard to the work to be conducted there.
- Possess suitable and sufficient means for preventing a fall.
- Possess a surface which has no gap through which a person could fall or
material or object could fall and injure a person.
- Giving rise to other risk of injury to any person unless measures have been taken to protect persons against such risk.
- Be so constructed and used, and maintained in such condition, as to prevent, as far as is reasonably practicable.
- The risk of slipping or tripping; or

- Any person being caught between it and any adjacent structure, where it has moving parts, they should be prevented by appropriate devices from moving inadvertently during work at height.

To control the hazards presented by falls from height the company will:

- Avoid work at height where it can.
- Prevent falls where it cannot avoid working at height.
- Minimise the distance and consequences of a fall where the risk of a fall cannot be eliminated.
- Produce appropriate rams before works commence.

Where working on a client's site all site-specific rams and risk assessments must be adhered to and the client must provide safe working platforms unless otherwise agreed, work at Height regulation's 2005 must be adhered to.

When learners must work at heigh the instructor must ensure they follow relevant RAMS and legislation, and emergency evacuation plan is in place.

14, Portable Electrical Equipment.

It is the policy of the company to use 110v or low voltage battery operated hand tools wherever possible. Where 240v hand tools are to be used they must be used in conjunction with a residual current device (RCD).
All portable electrical equipment must be inspected, and portable appliance tested (PAT) every 12 months, to be used in the office and all electrical equipment used on site will be PAT tested every three months by a competent engineer. All RCD's must be tested every three months. An inventory of all equipment must be maintained, and all new equipment is added to the list. Each piece of equipment must be clearly marked with the date of the test and the date of re-testing.
It will be the responsibility of the Director to ensure that all electrical equipment issued to operatives on site has been PAT tested and is in good condition. It is also the responsibility of the user to inform the Director if any equipment has been damaged or if the equipment does not work correctly, the user will inspect the equipment before use.
Any equipment that is not PAT tested cannot be used on Company premises or on site.

15. EMERGENCIES.

The Company will provide and display a set of emergency procedures to be followed in the event of fire, hazardous substance spillage etc. The procedures contain specific details on many aspects of fire prevention and what to do in the event of a fire e.g., smoking in delegated areas only, raising the alarm, assembling at the designated area etc, emergency exercises and drills will be held regularly to test the procedure and response of personnel.

The designated 'Competent Person' will act as 'Fire Marshall' and will be specifically responsible for the recording drills etc. Action will be taken to correct any deficiencies or weakness detected. When attending other sites it is important all personnel follow the sites emergency procedures as stated in their own risk assessment. All company personnel must complete a risk assessment, induct candidates and obtain emergency contact details prior to courses/tests commencing. When conducting Training, Testing and other work on other company sites all candidates must follow the site emergency procedures. For Training and Testing the Instructor MUST fill out a site specific risk assessment and obtain emergency contact details for each candidate before any work proceeds.

16. CONTRACTORS AND EMPLOYEES.

Once it has been established that they are competent , contractors and employees will be briefed on our policies in our onsite induction before undertaking any work for the company.
It is a requirement that all company staff and contractors working on behalf of the company should be provided with health and safety training relevant to their responsibilities and experience. All personnel must have relevant competence cards/qualifications, details of such training and the outcomes shall be recorded.

Trainees/Learners and other participants shall always be supervised by a person possessing the relevant competencies and the ratio of supervisor to trainee will be appropriate to the activity.
Competent personnel will investigate and record all accidents and dangerous occurrences within the company and on placement providers' premises where these incidents involve a trainee. Before courses commence trainees/Learners must receive the relevant induction and associated risk assessments and Method Statements

All site personnel and candidates must sign relevant Risk assessments and method statements prior to courses/work commencing, and the company must check if they have their own where applicable. Pennine training hub will conduct quarterly instructor appraisals, and carry out peer audits where appropriate to ensure quality and standards are maintained. All Contractors and Employees must wear correct PPE for tasks they are undertaking and ensure candidates and colleagues are maintaining safe working practices.
Employees and contractors must provide details of experience, qualifications, and Insurance before undertaking any work for the company.
If the company receives any complaints regarding contractors or employees, the issue will be reviewed in accordance with the company complaints procedure. If issues persist or are found to be a detriment to the company reputation or contractors misrepresent the company i.e. making false statements of fact that induce another party to enter a contract, causing loss. Legal terms include **fraudulent** (intentional), **negligent** (careless), and **innocent** misrepresentation, or break company policies or procedures their position will be reviewed potentially resulting in a disciplinary or potential dismissal.

17, Environmental & Sustainability Statement.

One of the key objectives of this company is to run its operations avoiding unnecessary or unacceptable effects on the environment. Any effects will be minimised as far as practicable. Environmental considerations will be given equal importance to the more traditional business issues such as production, research, sales, safety, and finance.

The Company will work towards achieving its environmental objectives by:

- Minimising the impact of all our operations on the local and global environment and the quality of life of the local communities in which the Company operates.
- Complying all relevant legal statutory regulations, Waste is removed in accordance with legislation by registered carriers to licensed tips, the company will keep copies of the relevant waste transfer notes and duty of care on system.
- Ensuring the cleanliness and appearance of premises to the highest practical standards.
- Ensuring the efficient use of all resources used in its operations and by reduction of waste, this will be achieved through process improvements. Recycling of all waste materials and general waste is continued wherever feasible and further positive steps are taken to conserve resources, particularly those that are scarce or non-renewable.
- Fully considering, in advance where possible, the environmental effects of any significant new development and adjust the Company's plans accordingly.
- Working with our suppliers to ensure that the products and services they supply are environmentally acceptable.
- Providing the information to enable employees to operate the processes properly and with minimal effects on the environment.
- Training staff, suppliers, and contractors to enhance awareness of environmental legislation, regulations, British Standards, and good practice.
- Developing a management system to demonstrate continual improvements in environmental performance.
- Ensuring measures are taken to control the ground, river, and coastal water pollution, and measures are taken to control noise pollution.
- Wildlife, habitats, flora and fauna, archaeological and heritage sites are protected as appropriate.
- All incidents detrimental to the environment will be investigated, reported, and preventative action. taken against repetition.
- Any materials entering site will have a waste transfer/Duty of care note from the Haulier.

The Company will form an Environmental Plan for the proposed works. This would include considering the following measures:
• Minimising water consumption arising from site activities.

• Monitoring and minimising site waster by Segregating and recycling site waste
• Adopting best practice policies for control of noise and dust.
• Sourcing materials from a Certified supplier

Duty of Care:

The duty of care under Environment Laws is recognised by the Company during the undertaking of its works and is met with by the following basic principles:
• Preventing anyone keeping, depositing, disposing of, or recovering our 'controlled waste' without a waste management licence or an exemption from the need for a licence.
• Stopping materials escaping from our control or the control of anyone else by packaging it appropriately.
• Ensuring waste is only transferred to an authorised person.
• Making sure that a person or business is authorised to deal with our waste.
• Ensuring that the waste being transferred is accompanied by a written description that will enable anyone receiving it to dispose of it or handle it in accordance with his or her own Duty of Care.
The necessary personnel and financial resources will be allocated to assist the Company in meeting its environmental objectives. In addition, we will continue to raise the levels of environmental awareness throughout its workforce and to promote this awareness to its customers and suppliers.
These policy's will be made available to any contractor/employee should they need to be reviewed.
This policy will be reviewed annually as part of the Management review process, to ensure its continued relevance and adequacy.

18, WELFARE ARRANGEMENTS.

Welfare facilities will be provided in compliance with the Workplace (Health, Safety & Welfare) Regulations 1992, and the Managing health and safety in construction, Construction (Design and Management) Regulations 2015 and their relevant approved codes of practice and guidance, as a minimum standard. Additional facilities will be provided as per the client's contractual requirements and the desire to project a professional company image.
Any employee found to be defacing or misusing the welfare facilities would face disciplinary action.

We will provide on any company Premises:

A supply of hot and cold running water for washing and a supply of drinking water

- Soap and hand cleansers
- Towels or other means of drying
- Separate adequate toilet facilities for men and woman
- Sanitary waste disposal will be provided in facilities used by female workers and visitors.
- A storing and changing room.
- We will provide storage for the employees clean clothing.
- Men and women will be able to change separately.
- A drying room for wet clothing (There will be no electrical heaters that present a risk of fire)

Pennine Training Hub, will ensure when attending contractors' sites, the client has adequate welfare arrangements/rest facilities. If the company is providing a venue company management will be assigned to ensure requirements are met.

Rest facilities consisting of the following.

- A clean canteen with heating and good ventilation
- Chairs with back supports and Tables.
- Running potable water
- Kettle
- Microwave
- Fridge
- First aid kit
- There will be daily cleaning of all welfare facilities.
- Waste bins will be emptied daily.
- We will provide a separate smoking area, as smoking is forbidden in the welfare facilities or the offices.

Smoking.

In accordance with the Smoke-free (Premises and Enforcement) Regulations 2006, the Company will ensure, as an employer, the risk of exposure to second hand smoke is reduced to as low a level as is reasonably practicable. All premises used as workplaces by the Company will be designated as no smoking. This will also be applicable to construction sites and welfare facilities/offices under the control of the Company.

Any employee found to be defacing or misusing the welfare facilities would face disciplinary action.

When are instructors, Employees, Contractors are working on site the Principal Contractors (The Client) have a legal duty to provide the same level and quality of welfare facilities on all construction sites across the UK under the CDM Regulations 2015.

Company Management will always undertake a pre-site survey of all sites prior to commencement of works on site, and weekly visits to sites. The quality of Contractors we will work for will provide particularly good standard of welfare facilities on site.
23/08/2024 Version1

19, House Keeping/General Public Safety.

Good housekeeping in construction is defined as the continuous, daily practice of maintaining an organized, clean, and safe work environment to prevent accidents like slips, trips, falls, and injuries from falling objects. It involves managing waste, storing materials properly, keeping walkways clear, and requiring all workers to clean as they go.

Key Principles of Construction Housekeeping.

- Clear Access Routes: Keep walkways, stairways, and emergency exits free from debris, tools, and materials.
- Waste Management: Dispose of waste and rubble promptly rather than letting it accumulate, and provide designated, marked bins.
- Proper Storage: Stack materials securely and store tools and equipment in designated areas when not in use.
- "Clean as You Go": Regularly remove waste materials during the shift rather than just at the end.
- Hazard Control: Immediately remove nails, clean up spills, and manage cables to prevent tripping.

Benefits of Good Housekeeping.

- Reduced Accidents: Minimizes injuries from slipping on debris, tripping, or being hit by falling objects.
- Improved Productivity: Increases efficiency as workers spend less time navigating mess or finding materials.
- Fire Prevention: Removes combustible waste, reducing fire risks.
- Safety Compliance: Ensures compliance with safety regulations and reduces potential fines.
- Actionable Housekeeping Rules.
- Store Materials Correctly: Keep materials away from walkways, and storing correctly prevents slips trips and falls and maintains accessibility.
- Manage Cables: Suspend power/light cables or cover them in walkways to prevent trailing and damage.
- Tool Safety: Store tools securely, not in high-traffic areas to prevent damage and theft

Good Housekeeping is an essential feature of accident prevention e.g., trip hazards, fire hazards etc.
The subject of housekeeping must be integrated into all monitoring arrangements to ensure high standards of housekeeping are maintained.
All personnel must ensure an excellent standard of housekeeping is always adhered to when undertaking works on or off the company premises and clean areas and leave in a respectable condition, in respect of third parties, it is essential that the housekeeping of this company will never present risks to third parties, not within the employment of this company.

General Public Safety.

The public is defined for the purpose of this Policy as any person who is not employed by the Company, e.g Neighbouring Businesses and their Employees,
Visitors to Company and neighbouring business premises
Pedestrians and road users,
Any persons who could be affected by Company activities on site locations.

It is company policy that in the yard all personnel are to sign in and sign out, all visitors are to wear a minimum of High Visibility vest, and steel toe cap boots, and when working around plant a hard hat and gloves must be in place, a relevant induction must have taken place and RAMS must be signed understood and in place.

When undertaking work/Training on other sites it is our policy to insure we uphold good housekeeping practices including cordoning off our work areas where possible to maintain a safe and tidy site and ensure it is not accessible to unauthorised personnel.

The public and other personnel must not enter company sites without relevant induction, supervision, and PPE.

20, FIRE

The Company will undertake all their operations in accordance with guidance provided within the Joint Code of Practice: Fire Prevention on Construction Sites (Sixth Edition). Through designing out risks, adopting safe working practices and taking simple precautions, the risk of fire will be reduced at our depot and on sites.

Where applicable, compliance with the requirements of the Regulatory Reform (Fire Safety) Order 2005 will also be met. Fire risk assessments will be undertaken as required by law, with recommendations addressed accordingly.

Fire Precautions.
The objective of fire precautions is the protection of life, avoidance of damage to property, plant, and processes from fire. Fires will only be tackled providing there is no risk of danger to you or others.
Common causes of fire are:

- Malicious ignition (including by children).
- Carelessness in smoking or with lighted matches.
- Faulty or misused heating equipment.
- Incorrect storage and careless use of flammable liquids. · Electrical faults.
- Careless use of cutting/welding equipment.

The Company will ensure that all site works will have established, prior to the commencement of works, the following arrangements:

- A fire safety plan to identify the controls required to eliminate or control the risk of fire on the site and at our depot.
- All hot works are to be undertaken in compliance with the depot hot works permit system. ·
- An effective regime to prevent fires by management controls.
- Where identified a means to detect heat or smoke and give warning of fire (fire alarm).

When instructors, Employees and contractors Visit client's sites, site specific fire procedures must be adhered to.

21, Anti Bribery Policy.

We are fully aware that unfortunately in the construction, Plant Examinations and Training industry acts of bribery take place on a regular basis, as a company we are strictly against these occurrences.
Definition
Bribery is the accepting of gifts, money, hospitality, or other favours in return for providing something of value to the briber. The purpose of this policy is to set out the rules that must be followed in this organisation to ensure that no bribery occurs.
Unacceptable behaviour.

The following behaviour is unacceptable, and must not occur in this organisation:

- Accepting any financial or other reward from any person in return for providing some favour or fraudulent certificate.
- Requesting a financial or other reward from any person in return for providing some favour.
- Offering any financial or other reward from any person in return for providing some favour.

Business gifts.

From time to time, customers, suppliers, or other persons might offer a gift to an employee. This could be a small item, or something of considerable value. All gifts, however small, must be reported to the manager and recorded. No gifts with a value of more than £20.00 may be accepted. If a gift is offered and then refused because of its value, this must be reported to the manager.

Hospitality.

From time to time, customers, suppliers, or other persons might invite an employee to a hospitality event. All such invitations must be reported to the Manager. Permission must be given by the manager before an employee accepts any invitation. (See Employee letter of authorisation)

Offering gifts and hospitality

It is this organisation's custom to offer small gifts (e.g., pens, diaries) to customers, suppliers, and other persons. If a gift is authorised by management, the employee is entitled to give it to the appropriate individuals. A record must be kept of all gifts (authorising manager to enter on to Authorised Gifts / Hospitality Record)

This organisation occasionally runs hospitality events, primarily aimed at thanking customers and suppliers for their custom and loyalty. An employee must not organise any additional hospitality event without seeking authority from his or her manager.

Responsibilities of the authorising Manager.

Managers are responsible for keeping a record of all gifts and hospitality that are offered and/or received by employees working in manager's area of responsibility.

If managers are concerned about any actions, they should contact a director immediately for advice.

Managers are also responsible for ensuring that all their employees are aware of this policy, and fully understand the rules in relation to the acceptance of gifts and hospitality.

Attempts to bribe.

Any employee who is concerned that he or she is potentially being bribed should report this matter to their manager immediately.

Donations to organisations:

The organisation makes regular donations to charity. These are managed by Senior Management. No employee should make donations to a charity without approval of this manager.

No donations should be made to charities, political parties, or other organisations with the intention of gaining a business advantage.

Bribery Disciplinary action:

Any employee found to have offered or accepted a bribe will face disciplinary action which could include dismissal for gross misconduct, **Instructors** found to be in breach of this policy, will also be reported to relevant governing body.

Raising concerns: If an employee is concerned that acts of bribery are occurring in the organisation, they should inform their manager in the first instance. If this course of action is inappropriate, the employee should inform another senior manager.

22, DRUGS AND ALCOHOL POLICY.

No employee/Contractor or candidate should be under the influence of alcohol or drugs when working for this organisation. The purpose of this policy is to set out the testing that will be carried out in relation to the use of drugs or alcohol. It is standard practice for a drug/alcohol test if any incidents occur.

Medically Qualified Company Representative:

The organisation will appoint a medically qualified provider of testing services. This provider will manage the process professionally and confidentially. Hereinafter referred to as the Company's Medical Provide.

Drug and Alcohol Testing:

This organisation reserves the right to carry out random testing of employees. Employees will be asked by a manager to go to the Company's medical provider to give a sample of blood, urine, or breath.
Employees will not be given any warning that they have been selected for testing.
Providing a sample
The giving of the sample of blood, urine or breath will be done in private with the Company's medical provider. The employee will be asked to sign a document to confirm that the sample has come from the employee, and the sample will then be sent off for testing.

Refusing to provide a sample:

Refusing to give a sample is potential gross misconduct. If the employee does refuse to give a sample, then a reason must be given. The action taken will depend on the reason given. However, it must be emphasised that all employees are required to be part of the testing procedure. Refusal is not accepted unless there is a good medical reason for this.

Medication and other medical issues:

If the employee is taking prescribed medication, then s/he should inform the Company's medical provider before the sample is taken. The Company's medical provider might require further details of the medication being taken, so that advice can be taken about any impact that it might have on the sample that has been given. All information given to the company nurse will remain confidential.
Pregnancy
If the employee is pregnant, she should inform the Company's medical provider before the sample is taken. There should be no problem with proceeding to take the sample, but if the employee is at all worried the Company's medical provider will discuss the issues with the employee. All information given to the Company's medical provider will remain confidential.

Test results:

If the results of any test show that the employee was under the influence of alcohol or drugs whilst at work, the company nurse will inform both the employee and the appropriate Company Manager. The employee is then likely to be subject to disciplinary proceedings, which could include dismissal.
It might be appropriate to carry out a further test. However, the time passed since the first sample was taken will be considered first. If any evidence of drugs or alcohol is likely to have passed from the body by the time that the results are available, then a further test is unlikely to be relevant.
Safety matters and responsibilities including the implementation of this Policy within the Company is the responsibility of the Director named as the Director with responsibility for Health and Safety on this last page of the document.

23, EQUALITY AND DIVERSITY POLICY.

As a Company and training provider we are committed to being a fair and inclusive which bases all decisions solely on merit. We will not tolerate unlawful discrimination against an individual based on their gender, race, nationality, age, disability, religion or belief, sexual orientation, gender reassignment or any other irrelevant factor.

We value all differences within the workplace and consider both visible and non-visible differences to be key in developing an innovative and creative working environment. We recognise the benefits that a diverse workforce can bring in understanding the needs of a diverse customer and client base.

We are committed to complying with relevant employment legislation and codes of practice as a minimum benchmark. Wherever possible we strive to exceed legislative requirements by developing policies and procedures that help us to achieve our aim of being an Employer of Choice.
It is the express policy of this Company that,

- All employment related decisions would be fair and transparent, based solely on merit and ability to meet the requirements of the job. This applies to external recruitment, internal selection and promotion, performance appraisal and training.
- Data relating to the composition of the workforce will be updated regularly to ensure that all management information is accurate.
- We will create a working environment where all employees are valued and respected for their unique contribution to the business and are not subject to inappropriate behaviour; and
- Immediate action will be taken against any employee, contractor, supplier, or agency worker who does not comply with this policy and who does not behave in a way that promotes equality and diversity.

- All students will be assessed fairly and based on skill, alterations to any lesson plans will be arranged should an individual require to suit their personal needs, to gain the best result.

Recruitment and Selection:

- Advertisement of vacancies will aim to be inclusive of all potential applicants by using a variety of media.
- All job descriptions and selection processes will be based solely on skills and attributes that are relevant to the role.
- Interviews for candidates fill all be conducted fairly by a Manager/Director to ensure candidates are suitable for the job role.

Employment:

- Terms and conditions of employment and provision of benefits will not unfairly disadvantage any groups and individuals.
- Access to training, development and promotion opportunities will be equal for all and selection for these will be based solely on merit.
- Employees must disclose any information that may have an impact on their job role.

Procurement:

- We consider the principles of equality and diversity to be a mainstream business issue and consequently will request that all suppliers/contractors and Clients demonstrate their commitment to the policy area when transacting with our company.

Anti-Discrimination:

We will not tolerate discrimination, harassment, or victimisation on the grounds of any of the following issues:

- Race.
- Gender.
- Disability.
- Religion/Belief.
- Sexual Orientation.
- Age
- Gender Re-assignment.

Relevant Definitions of forms of Discrimination.

Direct discrimination: Less favourable treatment on the grounds of race, gender, disability, religion/belief, sexual orientation, age, or gender reassignment.

Indirect discrimination: A neutral condition that is applied equally to everyone but has a detrimental impact on a particular group.

Harassment and bullying: Any unwanted behaviour that has the effect of violating dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment. This includes jokes or banter and extends to work related environments such as work social events.

Victimisation: Unfavourable treatment specifically because of the individual making a claim or complaint of discrimination.

SHOULD ANY BULLYING OR VICTIMISATION OCCURE IN THE CLASSROOM/PRACTICAL THE COURSE OR TEST MUST CEASE UNTILL THE INDIVIDUAL/INDIVIDUALS HAVE BEEN REMOVED.

Safety matters and responsibilities including the implementation of this Policy within the Company is the responsibility of the Director named as the Director with responsibility for Health and Safety on the last page of the document.

23/08/2024 Version1

24, DATA PROTECTION, GDPR AND DATA STORAGE POLICY.

This policy applies to the processing of personal data in manual and electronic records kept by the Company in connection with its operation as contractor and Training provider (Complete Site Skills LTD, is the official ICO Registered company and Training Provider, and is overall responsible for your Data Protection).

It also covers the Company's response to any data breach and other rights under the General Data Protection Regulation.

This policy applies to client data which includes the personal data of job applicants, existing and former employees, apprentices, volunteers, placement students, workers, and self-employed contractors. These are referred to in this policy as relevant individuals.

"Personal data" is information that relates to an identifiable person who can be directly or indirectly identified from that information, for example, a person's name, identification number, location, online identifier. It can also include Used data. The company shall securely store all personal data and information in accordance with the Data Protection Act 2018 and dispose of in a legal and protected manner.

"Special categories of personal data" is data which relates to an individual's health, sex life, sexual orientation, race, ethnic origin, political opinion, religion, and trade union membership. It also includes genetic and biometric data (where used for ID purposes).

"Criminal offence data" is data which relates to an individual's criminal convictions and offences.

"Data processing" is any operation or set of operations which is performed on personal data or on sets of personal data, whether by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

As a Company we make a commitment to ensuring that personal data, including special categories of personal data and criminal offence data (where appropriate) is processed in line with GDPR and domestic laws and in line with this, and other related, policies. Where third parties process data on behalf of the Company, the Company will ensure that the third party takes such measures to maintain the Company's commitment to protecting data. In line with GDPR, the Company understands that it will be accountable for the processing, management and regulation, and storage and retention of all personal data held in the form of manual records and on computers securely. It is the company's responsibility to check candidates ID prior to the start of the course and email proof to the company email address for safe storage.

Types of data held:

Personal data is kept in personnel files within our HR/SHEQ Management system. The following types of data may be held by the Company as appropriate, on relevant individuals:

- Name, address, phone numbers - for individual and next of kin.
- CVs and other information gathered during recruitment.
- References from former employers
- National Insurance numbers
- Job title, job descriptions and pay grades.
- Conduct issues such as letters of concern, disciplinary proceedings.
- Holiday records
- Internal performance information
- Medical or health information
- Sickness absence records
- Tax codes.
- Terms and conditions of employment
- Training details.
- Contractor's details

Data protection principles:

All personal data obtained and held by the Company will:

- Be processed fairly, lawfully and in a transparent manner.
- Be collected for specific, explicit, and legitimate purposes.
- adequate, relevant, and limited to what is necessary for the purposes of processing.
- Be kept accurate and up to date. Every reasonable effort will be made to ensure that inaccurate data is rectified or erased without delay.
- Not be kept for longer than is necessary for its given purpose.
- Be processed in a manner that ensures appropriate security of personal data including, protection against unauthorised or unlawful processing, accidental loss, destruction, or damage by using appropriate technical or organisation measures.
- Comply with the relevant GDPR procedures for international transferring of personal data.

In addition, personal data will be processed in recognition of an individuals' data protection rights, as follows:

- The right to be informed.
- The right of access.
- The right for any inaccuracies to be corrected (rectification).
- The right to have information deleted (erasure).
- The right to restrict the processing of the data.
- The right to portability.
- The right to object to the inclusion of any information
- The right to regulate any automated decision-making and profiling of personal data.

Procedures:

The Company has taken the following steps to protect the personal data of relevant individuals, which it holds or to which it has access:

Management are responsible for:

- The processing and controlling of data, Comprehensive reviewing and auditing of data protection systems and procedures, Overviewing the effectiveness and integrity of all the data that must be protected.
- The Company can account for all personal data it holds, where it comes from, who it is shared with and who it might be shared with.
- The company carries out risk assessments as part of its reviewing activities to identify any vulnerabilities in its personal data handling and processing, and to take measures to reduce the risks of mishandling and potential breaches of data security.
- The Company recognises the importance of seeking individuals' consent for obtaining, recording, using, sharing, storing, and retaining their personal data, and regularly reviews its procedures for doing so, including the audit trails that are needed and are followed for all consent decisions. The Company understands that consent must be freely given, specific, informed, and unambiguous. The Company works via an agreement arrangement with Clients and Client Companies will seek consent on a specific and individual basis where appropriate.
- The Company has the appropriate mechanisms for detecting, reporting, and investigating suspected or actual personal data breaches, including security breaches. It is aware of its duty to report significant breaches that cause significant harm to the affected individuals to the Information Commissioner and is aware of the possible consequences.
- It is aware of the implications international transfer of personal data internationally.

Access to data:

Relevant individuals have a right to be informed whether the Company processes personal data relating to them and to access the data that the Company holds about them. Requests for access to this data will be dealt with under the following summary guidelines:

- A form on which to make a subject access request is available from individual clients.
- The Company will respond to a request without delay. Access to data will be provided, subject to legally permitted exemptions, within one month as a maximum. This may be extended by a further two months where requests are complex or numerous.
- Relevant individuals must inform the Company immediately if they believe that the data is inaccurate, either because of a subject access request or otherwise. The Company will take immediate steps to rectify the information.
- Complete Site Skills and Pennine Training Hub Ltd will only share personal data with authorised internal staff, quality assurers, instructors, and awarding-body representatives (including monitors and officials) for the legitimate purpose of delivering, assessing, and quality-assuring training and qualifications. We may also inform employers or invoice payers about a learner's course progress where this is necessary and appropriate. Learners may request in writing that their information is not shared with their employer or invoice payer, in line with our Data Sharing Agreement and UK GDPR rights. All data will be processed securely and only retained for as long as required under our organisational policies and legal obligations.

Data disclosures:

The Company may be required to disclose certain data/information to any person. The circumstances leading to such disclosures include:

- Any employee benefits operated by third parties.
- Disabled individuals - whether any reasonable adjustments are required to assist them at Work.
- Individuals' health data - to comply with health and safety or occupational health obligations. towards the employee.
- Statutory Sick Pay purposes
- HR management and administration - to consider how an individual's health affects his or her ability to do their job.
- For smooth operation of any employee insurance policies or pension plans.
- For training purposes when Governing bodies require the relevant information to process applications and course content.
- By training governing bodies for auditing purposes

These kinds of disclosures will only be made when strictly necessary for the purpose.

Data security:

The Company adopts procedures designed to maintain the security of data when it is stored and transported including encrypted files and software.

In addition, the Company:

- Ensures that all files or written information of a confidential nature are stored in a secure manner and are only accessed by people who have a need and a right to access them.
- Ensures that all files or written information of a confidential nature are not left where they can be read by unauthorised people.
- Check regularly of the accuracy of data being entered into computers.
- Always use the passwords provided to access the computer system and not abuse them by passing them on to people who should not have them.
- Always locks away paper documentation.
- Uses computer screen blanking to ensure that personal data is not left on screen when not in use.

Any personal data relating to employees being transported on laptops, USB sticks, or similar devices, will be protected by:

- Ensuring that data is recorded on such devices only where necessary.
- Using an encrypted system — a folder should be created to store the files that need extra protection and all files created or moved to this folder should be automatically encrypted.
- Ensuring that laptops or USB drives are not left lying around where they can be stolen.

Failure to follow the Company's rules on data security will be dealt with under the Contract Agreement.

International data transfers:

The Company does not transfer personal data to any recipients outside of the EEA.

Data Breach notifications:

Where a data breach is likely to result in a risk to the rights and freedoms of individuals, it will be reported to the Client/Information Commissioner Office (ICO) within 72 hours of the Company becoming aware of it and may be reported in more than one instalment.

Individuals will be informed directly if the breach is likely to result in an elevated risk to the rights and freedoms of that individual.

If the breach is sufficient to warrant notification to the public, the Company will do so without undue delay.

Data protection Training:

All employees or associates receive training covering basic information about confidentiality, data protection and the actions to take upon identifying a potential data breach.

All employees or associates who need to use the computer system are trained to protect individuals' confidential data, to ensure data security, and to understand the consequences to them as individuals and the Company of any potential lapses and breaches of the Company's policies and procedures.

Data protection Records:

The Company keeps records of its processing activities including the purpose for the processing and retention periods in its HR Data Record. These records will be kept up to date so that they reflect current processing activities.

Data Protection Officer

The Company's Data Protection Officer is a Director of the Company is also responsible for Data Protection Compliance in respect of all Data Protection activities.

Safety matters and responsibilities including the implementation of this Policy within the Company is the responsibility of the Director named as the Director with responsibility for Health and Safety on the last page of the document. Complete Site Skills (associated with Pennine Training Hub)and other providers are registered with the Information Commissioners Office and all records are stored inline with current GDPR Legislation.

Data Sharing Agreement:

All personal data is processed and stored in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, we will not sell or share any of your data to none related organisations.

All personal data is processed and stored in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, we will not sell or share any of your data to none related organisations.

Complete Site Skills LTD, is a registered training provider, and the ICO registered company overall responsible for the storage of your information and associated with Pennine Training Hub Ltd with joint director.

We will only use your personal information for legitimate business purposes related to your training, assessment, and qualification. Your data may be shared internally with authorised personnel within both organisations, including trainers, assessors, administrative staff, and the Quality Assurance team, where necessary to support your learning and ensure compliance with awarding body requirements.

We will not share your personal data with any external third parties without your explicit consent, unless required to do so by law, regulatory obligation, or for the purposes of audit or compliance with awarding organisations.

All data is handled securely and retained only for as long as necessary in accordance with the standards outlined by the regulatory body (EUSR, NPORS, Pro Qual ETC) and in line with our Data Protection and data storage policy, (which all customers have the right to access) and ICO Standards, photographs, Videos of courses may be published on our social media platforms for advertising purposes unless candidates inform us that they do not wish to have an online presence.

We will not share your personal data with any external third parties without your explicit consent, unless required to do so by law, regulatory obligation, or for the purposes of audit or compliance with awarding organisations.

All data is handled securely and retained only for as long as necessary in accordance with the standards outlined by the regulatory body (EUSR, NPORS, Pro Qual ETC) and in line with our Data Protection and data storage policy, (which all customers have the right to access) and ICO Standards, photographs, Videos of courses may be published on our social media platforms for advertising purposes unless candidates inform us that they do not wish to have an online presence.

25, Students and Visitors on company Site.

When on a company site, these students may not have experience and knowledge on working Sites, it is our company policy that students are assigned their own working areas that are cordoned off from the rest of the site, walkways must not be ignored, as to lead by example.

Students and Visitors must be provided with an induction on out the site, heavily outlining site safety and their responsibilities, along with ours. It is our responsibility to ensure that students and Visitors are always wearing correct PPE and we assist if they are lost or need assistance.
Students must always be supervised by their instructor/Teacher when in working areas, and not left unattended under any circumstances. The company are to provide students with the same, safe, and friendly site hospitality we would all expect when visiting other sites. Instructors must ensure students are always accompanied and adhere to rules and regulations, and students sign relevant Risk assessments when undergoing training/testing.

26, Mental Health Policy.

Mental health problems and stress can affect anyone, regardless of their position or status. This policy applies equally to all employees and will be supported and implemented in conjunction with other human resources and health and safety policies.

Aims:

To recognise that workplace stress is a health and safety issue and acknowledge the importance of identifying and reducing workplace stressors.
As an employer we aim to create and promote a culture where employees can talk openly about their job and mental health problems and to report difficulties without fear of discrimination or reprisal.

Objectives:

To tackle workplace factors that may negatively affect mental wellbeing, and to develop management skills to promote mental wellbeing and to manage mental health problems effectively where these manifest at work, even if they are not directly caused by work.
To provide support and assistance for employees experiencing mental health difficulties.
To show a positive and enabling attitude to employees and job applicants with mental health issues, within the context of their role.
Responsibilities and Commitment
Everyone has a responsibility to contribute to making the workplace mental wellbeing policy effective.

Directors and Managers have a responsibility to:

- Monitor the workplace, identify risks and work to eliminate or reduce them as far as reasonably practicable.
- Ensure effective communication between management and staff, particularly regarding organisational and procedural changes.
- Assist and support employees who are known to have mental health problems or are experiencing acute stress outside work – for example due to bereavement or separation.
- Ensure staff are provided with the resources and training they need to carry out their job.
- Monitor workloads avoid overloading people, and ensure staff are taking their full holiday entitlement.
- Organise training and awareness of workplace mental wellbeing.
- Provide advice and support to employees and managers in relation to this policy.
- Monitor levels of sickness absence through mental health problems including stress-related illness.

Employees have a responsibility to:

- Raise issues of concern with their manager, human resources, or Director.
- Accept opportunities for counselling when recommended.
- Look out for each other and encourage colleagues to seek support when needed.

27, Occupational Health.

The Company is committed to the general provisions of occupational health care and to provide:

- Advice and guidance will be given to management in relation to the health and welfare of all employees.
- The provision of health monitoring, health surveillance and relevant records as required by the Control of Substances Hazardous to Health Regulations 2005, Chemical Hazard Information Packaging Regulations 2005 and the Health and Safety (First Aid) Regulations 1981.
- The provision for the care and rehabilitation of staff suffering from mental health disorders.
- Controls for the monitoring of extreme temperatures while at work.
- Controls and assessments for tasks and processes involving manual handling.

- Controls and systems for personnel involved in operating display screen equipment workstations.
- Controls and safe systems for personnel involved in the use of vibrating tools that present a risk of hand, arm vibration syndrome.
- Controls and safe systems for whose employees work in noisy environments and implementing effective noise control techniques.
- Provide reasonable adjustments for people with disabilities to support them in employment.
- To manage early return to work after sickness certification and wherever support rehabilitation after prolonged illness.

It is the Company's responsibility to ensure the health, safety, and welfare of all its employees as far as is reasonably practicable. All necessary precautions shall be taken by the company to ensure that where possible occupational health risks are eliminated or reduced at source.
The Company shall identify from risk assessment procedures where health surveillance, screening, and monitoring of our employees are required.
Health Surveillance shall be undertaken where: -
It is required by specific Legislation i.e., working with asbestos etc.
Risk assessment identifies significant risks to health of employees i.e., HAVS, Noise and working with substances hazardous to health etc.

There are adverse health conditions or identifiable diseases related to the work activity to which an employee is likely to be exposed.
Health surveillance is likely to provide further protection to the health of employees exposed to work related activities.
The Company will ensure that there is adequate provision for occupational health surveillance, screening, and consultation. This will be achieved, when necessary, by using an occupational health professional whose services can be used as and when required.
To ensure the health of employees at work, suitable and sufficient risk assessments shall be completed identifying any residual health risks that would require health surveillance and/or screening. These assessments would under normal circumstances be carried out in line with the standard risk assessment procedure.
Following the assessment, any potentially hazardous tasks must be controlled and monitored, and the effectiveness of the control measures recorded.
In the circumstance where an employee returns to work having suffered an injury and that injury may be exacerbated by their work activity, the Occupational Health professional should reassess the employee to ensure that they are fit for their duties.
New activities should also be assessed as and when they are introduced into the workplace and any changes to safe systems of work and substances used to assess occupational health risks.
In some cases, it may be necessary to adjust the duties of employees to suit their medical conditions. Any alterations to employee working arrangements should be made following advice from the Occupational Health professional.
Some work activities may constitute health risks that cannot be eliminated or reduced at source. It is therefore essential that control measures for these activities are suitably enforced and monitored.

Premises Health and Safety Arrangements

The Company will ensure that The Workplace (Health, Safety and Welfare) Regulations 1992 which places requirements to all the Company's workplaces provided for Employees and self-employed, which includes offices, stores, and welfare facilities etc are complied with.

- **Maintenance**
  The workplace and associated equipment and systems will be maintained in a clean and efficient state, in efficient working order and in good repair, maintenance records will be kept.
- **Ventilation**
  Where windows or other openings will not provide suitable ventilation, mechanical ventilation systems will be provided and properly maintained. Detailed advice is given in HSE Guidance Note EH22 Ventilation in the Workplace.

- **Temperature**

The temperature in workrooms will be “reasonable” and where practicable, this will normally be a minimum of 16°C. Where work involves significant physical effort, the temperature will be at least 13°C. If, despite measures to heat or cool a workroom, workers are exposed to temperatures, which do not give reasonable comfort, suitable protective clothing and rest facilities will be provided. Sufficient suitable thermometers will be readily available to allow workers to check the temperature in the workplace.

- **Lighting**
  Natural lighting will be provided, where reasonably practicable; windows and skylights will therefore be kept clean. Lighting will be sufficient to enable people to work and move safely without visual fatigue. Local lighting will be provided where necessary. Where appropriate, emergency lighting will be provided and maintained. Further guidance is given in HSE booklet HS (G) 38 Lighting at Work.
- **Cleanliness and Tidiness**
  Floors, walls, and ceilings, together with furnishings will be kept sufficiently clean, the standard of cleanliness depending on the use of the workplace. Some other Regulations, e.g., the Food Hygiene Regulations have specific requirements. Absorbent floor surfaces, such as untreated concrete or timber, which are likely to be contaminated by oil, grease, etc., will be sealed or coated, e.g., with suitable non-slip floor paint. Waste, dirt and refuse will be cleared regularly. Furniture, materials, and tools will be placed so that they do not cause people to trip or fall and do not obstruct access or fire escape routes.
- **Space**
  Workrooms will have enough space to allow people to move with ease. The total volume of a workroom, when empty, divided by the number of people normally working in it, will be at least.
  11m3 (in this calculation, a room or part of a room which is more than 3.0m high, will be counted as 3m high).
  The figure of 11m3 per person may be insufficient if much of the room is taken up with furniture, etc. This recommended minimum figure does not apply to rooms used for lectures, meetings etc.

- **Workstations & Seating**
  Workstations will be arranged so that each task can be carried out safely and comfortably. Seating will, where possible, provide adequate support for the lower back; a footrest will be provided where the foot cannot comfortably be placed flat on the floor. Further guidance on seating is given in HSE booklet HS(G) 57 Seating at Work.
- **Floors and Routes**
  Floors of workplaces and surfaces of passages, staircases, access roads, etc., will be suitable for their intended use and properly maintained. Measures will be taken to reduce the risk of persons slipping, tripping, and falling,
- **Precautions against persons or objects falling.**
  Secure and suitable fencing, guard-rails or covers will normally be provided where persons are liable to fall or at any height. Fencing installed after 1 January 1993 will extend to at least 1.10m in height, except where lower fencing has been approved under Building Regulations. Guard-rails will consist of a top rail and at least one intermediate rail will be fixed to prevent persons from falling under the top rail.
  Where it is not reasonably practicable to take measures such as the provision of fencing, guard-rails, etc., to prevent falls, entry to such “danger areas” will be restricted to authorised persons who have received adequate information, instruction, and training on any appropriate safe system of work. In certain situations, a Permit-to-Work system will be appropriate.
- **Barriers and Gates**
  Barriers and gates shall be secured when areas are not in use to prevent unauthorised access, they must also be used in relevant work areas to prevent unauthorised access as per RAMS.
- **Use of Display Screen Equipment**
  Hazards associated with the use of Display Screen Equipment (DSE) are those leading to musculoskeletal problems, visual fatigue, and stress. The likelihood of experiencing any of these problems is remote and usually related to duration and intensity of the use of DSE, combined with the ergonomic factors of the workstation and the environment in which it is situated.
  The Regulations apply only to the protection of Employees who are ‘users’ as defined by the Health & Safety (Display Screen Equipment) Regulations 1992. A ‘user’ means an Employee who habitually uses

DSE as a significant part of normal work, whether at his/her own employer's workstation, at another employer's workstation, or at a workstation at home.
DSE Risk Assessment
The Regulations require a Risk Assessment of all workstations used.

- **COSHH Storage and Usage**
  Any COSHH substances will be stored within current COSHH Legislation, and specific Safety Data Sheets stored onsite. Any PTHub personnel using hazardous chemicals must ensure they have read understood and signed the relevant Risk assessments and have the correct PPE, before using hazardous substances and chemicals.
- **Racking and Stacking**
  When using Racking PTHub personnel must ensure it is compliant and has a Safe Working Load which must not be exceed. They must also ensure it is fit for purpose. When stacking objects personnel must ensure it is stacked correctly and has adequate support underneath and behind to ensure it does not fall and pose a threat to traffic and other site personnel/visitors. Stacking must not take place on racking/Loading bays without a SWL, and where instructors are onsite, they must not stack materials on containers/buildings etc without site permission.

28, Lone Workers.

The company is aware of the additional risks involved when lone workers carry out their duties and will implement such safe working procedure to ensure that they not incur more risk than other employees. To identify the significant risks involved in lone working. Managers will maintain contact with lone workers to ensure they are ok, and no issues have occurred, and company vehicles will contain first aid kits.

Managers will carry out a Risk Assessment using the below factors as a minimum:

- Does the workplace present significant risks to the lone worker?
- Is access and egress suitable for the lone worker, including provision of temporary access equipment?
- Can plant substances and materials be handled by one person?
- Are there personal risks such as violence?
  Is the lone worker medically fit and suitable for the work?
- Is additional training required for the lone worker?
  How will the person be supervised?
  What communication procedures are in place for emergencies such as the worker becoming ill or having an accident?
- The Company will also ensure that lone workers should not be subjected to high-risk activities due to their vulnerability and lack of assistance in the event of emergencies.

The following circumstances will not involve lone workers:

- High level works where provisions must be in place to protect persons from falling.
- Heavy or awkward manual handling operations.
- Hazardous substances which could asphyxiate persons. Confined spaces where access and egress are limited and there is the potential of an environment becoming hazardous.
- Lifting operations.
- Working at height.

29. Young Persons & Safe Guarding Policy.

A *young person* is defined as anyone under 18 years of age. This includes:

- Employees.
- Apprentices and trainees.
- Students on work experience or placements.
- Visitors who are under 18.

General Safeguarding Principles.

The company and associates have a legal and moral duty to protect the health, safety, and welfare of all young persons on site. Young persons must **never be exposed to avoidable risks**, and their work activities must always reflect their age, maturity, competence, and physical capability.

Restrictions on Work Activities.

Young persons **must not**:

- Operate or drive plant, machinery, or mechanical equipment, unless specific risk assessments/ method statements have been undertaken and are adhered to.
- Work at height or in any situation where there is a **foreseeable risk of serious harm**
- Carry out high-risk tasks, hazardous operations, or unsupervised work

Young persons may only observe or participate in restricted activities **as part of structured training**, and only when a **competent instructor** is present.

Risk Assessment Requirements.

Before any young person begins work, including apprentices and trainees:

1. A **suitable and sufficient risk assessment** must be completed for all tasks they may undertake.
2. The assessment must specifically consider:
   - Physical and psychological maturity
   - Lack of experience or awareness of risks
   - Additional supervision requirements
3. The **parent, Employers or legal guardians** must be provided with a copy of the risk assessment.
4. The assessment must be **explained in full** to the parent or guardian.
5. The young person may only start work once **written consent** has been received.

Supervision Requirements.

- All young persons (under 18) must be **accompanied at all times** by a **competent person** who is qualified in the activity being carried out.
- Young persons must **never work alone** or be left unsupervised.

The only exception is where:

- The task is **basic and low-risk**,
- A **specific individual risk assessment** has been completed, and a **Director** has issued written authorisation to both the young person and their supervisor.

Operation of Plant and Machinery.

Young persons are **not permitted** to operate plant or machinery unless:

- They are under the direct instruction of a **qualified training instructor**, and
- A **task-specific risk assessment** has been completed and approved

Even under training conditions, the young person must remain **fully supervised** and must not operate equipment independently.

Responsibilities.

The Company Will:

- Ensure safeguarding measures are in place and followed.
- Provide competent supervision.
- Complete and review specific risk assessments.
- Communicate clearly with parents/guardians.
- Prevent young persons from undertaking unsafe tasks.

Supervisors Must:

- Monitor young persons continuously.
- Be trained and competent.
- Ensure they do not exceed their permitted duties.
- Report any concerns immediately.

Young Persons Must:

- Follow all safety instructions.
- Work only under competent supervision.
- Report anything they feel unsafe about.

Review and Monitoring.

This policy will be reviewed annually or sooner if:

- Legislation changes.
- An incident or near miss occurs involving a young person.
- Work activities or training programmes change.

30. Dealing with the Enforcing Authorities Procedure.

The Director will meet any representative of an enforcing authority e.g., the Health and Safety Executive, Local Authority, Environment Agency, Police etc, unless this responsibility has been delegated to another appointed person. The visiting officer must be directed to the Manager/Supervisor or if they wish to proceed unaccompanied the Manager/Supervisor must be notified directly.
Full co-operation must be given to assist them in the execution of their duties.
If enforcement action is taken such as a Prohibition Notice or Improvement Notice issued or Fee for Intervention, then the Manager/Supervisor to whom it is issued must comply with any immediate requirements and then contact a director.
The Director will liaise with the relevant inspector and inform him/her of corrective action taken and confirm this in writing.
If as part of an investigation by the enforcing authorities, any employee is required to make a statement or interview under caution, then the Company appointed solicitor should be present.
If as part of an investigation by the enforcing authorities, any employee is required to make a statement or interview under caution and the Police and Criminal Evidence Act (PACE), then the Company appointed solicitor should be present.

31. Violence, Harassment and Aggression in the Workplace – Policy Statement.

As a reputable company, we will not tolerate deliberate acts of harassment, aggression, or violence in the workplace. All cases will be fully investigated via the Disciplinary Policy and Procedure and/or the Bullying and Harassment Policy and Procedure. Where proven, cases will be treated as gross misconduct and result in dismissal or where appropriate, criminal action.

Violence and aggression can be defined as:

- Aggressive physical contact which may or may not result in pain or an injury.
- Other aggressive behaviour that includes threatening physical violence, verbal or written abuse, intimidating or belittling behaviour causing fear or concern.
- Behaviour that is involuntary, but which results in aggressive physical contact or abuse (Challenging Behaviour).

Standards:

- To meet the requirements of the above policy statement, managers shall ensure:
- That all incidents of violence, harassment and aggression must be reported and appropriately investigated by senior management.
- Staff and company representatives who have been exposed to violence or aggression are offered appropriate support and assistance as soon as is reasonable after the incident.
- That false (i.e., malicious) accusations will not be tolerated and may result in disciplinary action.
- If acts relating to this have been reported to any site personnel, it must be reported to management.
- If relating to this statement are witnessed or reported by to company personnel but relate to another employee for a client (I.e a student) thorough details must be taken and reported to management.

32. Reasonable Adjustments Policy.

This policy applies to All learners, company representatives and all courses delivered by Pennine Training Hub.

Equality & Inclusion Commitment

Pennine Training Hub, is committed to complying with the Equality Act 2010 and supporting learners who may require reasonable adjustments due to:

- Dyslexia, Dyspraxia, ADHD, Autism
- Visual or hearing impairments or English as an additional language
- Physical disabilities, Temporary injuries or medical conditions
- Anxiety or other mental health conditions

We aim to remove barriers to learning while maintaining the integrity, safety, and competence standards of our qualifications.

Reasonable Adjustments

A reasonable adjustment is a change to the delivery or assessment method that enables a learner to demonstrate competence without altering the required standard.

Adjustments will not:

- Lower assessment standards, Compromise health & safety or Provide an unfair advantage
- All adjustments must be approved by the Training Manager and, where applicable, the awarding body.

Examples of Reasonable Adjustments

Depending on awarding body rules and course requirements, reasonable adjustments may include:

- Extra time in written assessments, Use of coloured overlays or printed materials on coloured paper (for dyslexia and dyspraxia)
- Verbal clarification of written questions,
- The supply of approved translator (At clients cost) / Reader or scribe support (where permitted)
- One-to-one assessment environment.
- Enlarged print materials and changes in font/ Oral questioning instead of written responses (where permitted)

Disclosure of Learning Needs

Learners are encouraged to disclose any learning difficulties, disabilities, or medical conditions at the time of booking or as soon as possible.

This allows us to:

- Plan appropriate support and Ensure appropriate staffing and facilities are available
- Apply for awarding body approval if required

Failure to disclose in advance may limit the adjustments that can be made on the day of training.
All information will be treated confidentially in accordance with current GDPR regulations.

FOR CITB HEALTH AND SAFETY TESTS, We must be informed of any special requirements (Headsets, Language barriers etc during the booking process.

Late Disclosure of Learning Needs

If a learner discloses a learning need on the day of training:

- We will make reasonable efforts to support them immediately
- If adjustments require awarding body approval, the assessment may need to be rescheduled
- Additional charges may apply if rescheduling is required
- If cancellations are made refer to our terms and conditions found in email trail.
- If Courses are cancelled due to none or late disclosure and inability to continue with the course, this may result in charges as per cancellation policy.

Changes to course content

- Pennine Training Hub, will ensure all content is updated as necessary to conform with changes in regulations or requirements by the governing bodies. The company will also monitor feedback forms and test results make changes if specific areas of interest are identified as weak areas.

33. Complaints Policy

Pennine Training Hub LTD, welcome complaints and value your feedback, we use all feedback to monitor and improve our service to all of our customers. All complaints will be handled efficiently and sensitively.

Definition

A complaint is defined as an expression of dissatisfaction/ Displeasure with one of our services
• Provisions of the Pennine Training Hub Ltd and offerings affecting our customers (such as trainers, examiners, instructors, administration, etc)
• Action or lack of action by Pennine Training Hub representatives.
• Standards of service, courses or facilities provided by Pennine Training Hub.

Details of your Complaint

To enable us to respond to your complaint efficiently, we need you to request (preferably by email info@pthub.uk) a Complaints form. This needs to be filled out with as much information as possible,
• Your contact information – name, address, email address and telephone number
• The course you attended (if relevant)
• A clear description of your complaint.
• Copies of any relevant or associated paperwork
Once submitted Pennine Training Hub will review and respond within 24 hours of submission.

34. Appeals Policy and Procedures.

This policy describes the actions and responsibilities required to deal with all training/assessment appeals in a uniform and fair manner in line with related policies. It Applies to all in-house assessments and internal and external training courses (both accredited and inhouse) carried out by approved persons within the company.
The Training/Assessment Appeals Procedure will available to all candidates. Where assessing/training is in line with an accredited organisation, the relevant appeals procedure will be referenced. All candidates have the right to appeal should they feel necessary.

Appeal Stage One.

1. Candidate/Representative fills out appeal form.
2.Upon receipt of a Candidate challenge to an assessment/course outcome decision; decision regarding reasonable adjustment and other special considerations; or a decision taken as a result of a malpractice or maladministration, the assessor/training shall confirm with the candidate that he/she wishes to appeal and record on the Appeal Form.
3. The assessor/trainer shall consider the reason(s) for the challenge and look again at the evidence presented, giving an immediate written response using the appeal form, including a clear explanation of the decision and either the new decision or confirmation of the original decision
4. If the Candidate is not satisfied, the assessor/trainer shall record on appeal form and ensure that the appeal moves onto stage two.

Appeal Stage Two.

5. Within 2 working days of the appeal reaching stage two, the assessor/trainer shall pass the appeals form and evidence (assessment record, the Candidate's evidence, the appeal, written complaints from other learners) with the written explanation and conformation of the decision information to the Head of Training
6. The Head of Training shall reconsider the assessment decision, taking into account the Candidate's reason for appeal, evidence and associated records and the assessor/trainer reason for the decision, including the opinion of a second assessor/trainer from the centre.
7. The Head of Training shall then give the Candidate the reconsidered decision, in writing, within five working days of receiving the appeal.
8. If the Candidate confirms that they are still not satisfied after stage 2, the Head of Training shall ensure that the appeal moves onto stage three.

Appeal Stage Three.

9. The Head of Training who acted at stage two, shall direct the candidate to the relevant accredited body appeals procedure (e.g. NPORS, EUSR, DMQ) and will be reminded of the process explained during induction regarding the appeals procedure and address to write to. Following an appeal decision that is upheld due to a failure in the company's training/assessment process, or notification of failure in the training/assessment processes of other awarding organisations, policies and procedures shall be reviewed to ensure that the failure does not reoccur which may impact other learners. This policy and its procedures will be reviewed as part of our quality assurance requirements to ensure it is fit for purpose, reflects the type of appeals that we may receive and ensure the process is managed in accordance with regulatory requirements. The Head of Training (Daniel Bistacchi) is responsible for tracking all appeals to ensure a resolution is reached within the agreed timeframes as dictated in this procedure and within the relevant accredited bodies appeals procedure. The Head of Training is also responsible to ensure that appeals are monitored over time and any trends recognised and acted upon accordingly.

Appeals shall be a permanent agenda item on annual meetings. Where a referral is made to the regulators, we will take appropriate, preventative and/or corrective action to prevent re-occurrence as appropriate, such as:

- Identifying any other learners who have been affected to correct and mitigate, as far as possible, the effect of the failure (e.g. and amend the results for the learner(s) affected following an appropriate investigation)
- Reviewing our associated processes and policies to ensure that the 'failure' does not occur again or mitigate the situation as far as possible if the failure that occurred cannot be corrected
- Cooperating with any follow-up investigations required by the regulators and, if appropriate, agree any remedial action with them. Where the appeal relates to the outcome of assessment, we will ensure independent review any assessment evidence concerned. Where an appeal against assessment brings the outcome of other results into serious question this would be considered a potential 'adverse effect' as other learners may be affected.

In such cases, we will ensure that:

- Any other learner who has been affected is identified
- Effects are corrected or mitigated as far as possible. This may involve adjusting the outcome of assessments (pass/fail) and re-issuing results, or revoking certificates
- Appropriate action is taken to avoid a re-occurrence.

This may involve for example taking action against sub contactors, assessors, instructors or internal quality assurers, external quality assurers. Pennine Training Hub ensures that any actions are monitored through its internal reporting process. Trends are identified and action put in place to negate reoccurrence.

35. Whistle Blowing Policy.

We are committed to conducting our business with honesty and integrity and we expect all staff to maintain high standards. Any suspected wrongdoing should be reported as soon as possible.

- This policy covers all, consultants, contractors, training providers, instructors, operators, employers, interns, casual workers, customers, agency workers and members of the general public.
- This policy aims to encourage you to report any concerns you may have in relation to illegal or suspicious activity.

What is Whistleblowing?

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

If you are uncertain whether something is within the scope of this policy you should seek advice from the Compliance Officer, Daniel Bistacchi or Neil Simpson

How to Make a Report

In order to make a whistleblowing report, you should contact the Compliance Officers, your report should include.

- Names and details of the proposed suspicious activity, together with any evidence of such activity.

Your report should be made on a confidential basis, and any concerns should not be raised with any third parties. Following review of the report, we will arrange a meeting or phone call with you as soon as possible to discuss your concern.

Reports Made.

Any report made under this whistle-blowing policy should be based on evidence and genuine reasons for suspicion.

- We will be unable to investigate any reports that are made based on personal opinion and lacking in evidence.
- If we conclude that a report is made in bad faith and the allegations therein are false, we, together with the accused, may have to take appropriate action against the whistleblower.

Confidentiality.

We hope that staff will feel able to voice whistleblowing concerns openly under this policy.

Completely anonymous disclosures are difficult to investigate, if you want to raise your concern confidentially, we will make every effort to keep your identity secret and only reveal it where necessary to those involved in investigating your concern.

Protection and Support for Whistleblowers.

- We aim to encourage openness and will support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken.
- Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Compliance Officers immediately.
- If, for any reason, you do not wish to make a whistle-blowing report direct to the company, please contact. Pennine Training hub and in the Subject Put FAO Daniel Bistacchi or Neil Simpson, so no one else will open the email.

Investigation.

- Once you have raised a concern, we will carry out an initial assessment to determine the scope of any investigation. We will inform you of the outcome of our assessment. You may be required to attend additional meetings in order to provide further information.
- In some cases we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator (or investigators) may make recommendations for change to enable us to minimise the risk of future wrongdoing.
- We will aim to keep you informed of the progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation, an outcome or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- If we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

If you are not Satisfied.

- While we cannot always guarantee the outcome you are seeking, we will try to deal with your concern fairly and in an appropriate way. By using this policy, you can help us to achieve this.

- If you are not happy with the way in which your concern has been handled, you can raise it with our [Complaints Manager Daniel Bistacchi], whose details are also provided in Schedule 1. 9 Action Taken Following an Investigation

36. Conflict of Interest Policy.

The purpose of this Conflict of Interest Policy is to protect the integrity, reputation, and legal compliance of Pennine Training Hub LTD by ensuring that all business decisions are made in the best interests of the company, its learners, clients, awarding bodies, partners, and stakeholders.

This policy establishes clear guidelines for identifying, declaring, and managing actual, potential, and perceived conflicts of interest.

This policy applies to.

- Directors and Management
- Employees (permanent, temporary, and contracted)
- Tutors, assessors, IQAs/EQAs (internal and external quality assurers)
- Any individual acting on behalf of the company

Definition of a Conflict of Interest.

A conflict of interest arises where an individual's personal, financial, or other interests could improperly influence, or be perceived to influence, their professional judgement, responsibilities, or decision-making on behalf of the company.

Conflicts may be:

- Actual – A direct conflict currently exists
- Potential – A conflict may arise in the future
- Perceived – A third party may reasonably believe a conflict exists

Examples of Conflicts of Interest

Examples include (but are not limited to):

- Delivering training or assessing a family member or close associate
- Having a financial interest in a supplier, subcontractor, or competitor
- Accepting gifts, hospitality, or incentives that could influence decisions
- Engaging in outside employment that competes with or compromises company interests
- Involvement in awarding contracts where the individual has a personal connection
- Sharing confidential company or learner information for personal benefit
- Influencing learner outcomes for personal or commercial gain

Responsibilities.

Directors.

Directors are responsible for:

- Setting the tone for ethical conduct
- Ensuring compliance with this policy
- Reviewing and approving conflict declarations
- Taking appropriate action where conflicts arise
- Reviewing this policy

Managers.

Managers must:

- Promote awareness of this policy
- Ensure staff understand their obligations
- Address declared conflicts promptly and fairly

Employees, Contractors and Associates

All individuals covered by this policy must:

- Act in the best interests of the company at all times
- Avoid situations where conflicts may arise
- Declare conflicts promptly
- Cooperate with any measures put in place to manage conflicts
- Inform Candidates of the examination process prior to the test commencing
- Treat individuals, fairly equally and with respect without a bias opinion

Declaration of Interests

All relevant individuals must:

- Declare any actual or potential conflicts upon appointment or engagement
- Complete an annual Conflict of Interest Declaration Form
- Update their declaration immediately if circumstances change

Declarations should include:

- Financial interests
- External employment or consultancy work
- Personal relationships that may affect impartiality
- Gifts or hospitality exceeding reasonable and proportionate value

Management of Conflicts.

When a conflict is identified, the company may take one or more of the following actions:

- Remove the individual from the relevant decision-making process
- Reassign assessment, quality assurance, or training responsibilities
- Require supervision or independent review
- Restrict access to sensitive information
- In serious cases, terminate engagement or employment

All decisions will be documented and retained securely.

Gifts and Hospitality.

Employees and associates must:

- Not accept gifts, payments, or benefits that could influence business decisions
- Declare any hospitality or gifts over a reasonable nominal value
- Refuse any inducements intended to secure favourable treatment

Any concerns relating to bribery must be reported in line with the company's Anti-Bribery and Corruption procedures.

Confidentiality.

Individuals must not use confidential information obtained through their role for personal advantage or to benefit third parties.

Confidential information includes:

- Learner data
- Assessment materials
- Commercial pricing
- Tender information
- Internal financial data

Monitoring and Record Keeping.

The company will:

- Maintain a Conflict of Interest Register
- Review declarations annually
- Audit assessment and quality assurance processes to ensure impartiality
- Make records available to awarding organisations or regulators upon request

Breaches of Policy.

Failure to disclose a conflict of interest or acting improperly in relation to a conflict may result in:

- Disciplinary action
- Termination of employment or contract
- Removal from assessment or quality assurance duties
- Reporting to awarding bodies or regulatory authorities

Following the conclusion of an investigation, we will review our procedures and policies to ensure that we are measuring and monitoring risks appropriately.

37. ITC Health and Safety Testing and Invigilation Policy.

Complete Site Skills LTD/Pennine Training Hub, is committed to maintaining the integrity, security and fairness of all examinations and assessments delivered. We recognise that many of the qualifications we deliver lead to industry approved certification (DMQ,CSCS, CITB, NPORS,EUSR etc) and employment within construction and related sectors. It is therefore essential that all assessments are conducted in a controlled, consistent and compliant manner that meets awarding organisation requirements. All candidates will be treated equally with respect and with an un bias opinion, they will be informed of the assessment process prior to the assessment taking place, to make them aware of the examination rules and conduct requirements. Instructors will not give any answers to candidates during the examination and candidates are not guaranteed a pass, all testing will therefor be conducted as per the awarding body requirements.

This policy applies to:

- All paper-based and online examinations
- Knowledge tests linked to accredited qualifications
- Any externally set assessment delivered under examination conditions
- All staff/contractors involved in the administration/ invigilation of examinations (Instructors and Assessors)

This includes directors, centre managers, tutors, assessors and any authorised invigilators working on behalf of the company.

Principles:

The Company will ensure that:

- Examinations are conducted under appropriate conditions
- Learners are treated fairly and consistently
- Assessment materials are kept secure at all times
- Any suspected malpractice is dealt with promptly and reported where required
- All awarding body requirements are followed in full

Appointment of Invigilators:

Invigilators (Instructors and Assessors) are appointed by company management and must be:

- Competent and suitably briefed
- Familiar with the examination regulations and criteria they will be invigilating
- Independent and impartial

Invigilators must declare any conflict of interest prior to supervising an examination.

Preparation for Examination Sessions:

Prior to each examination session, the responsible staff member must ensure:

- The room is suitable, quiet and free from disruption
- Desks are spaced appropriately
- Unauthorised materials are removed
- Required examination materials are present
- Attendance registers are prepared
- Candidates must put belongings in locker and follow Pearson Vue test proceadures.

Examination papers and online access details must be stored securely and only accessed by authorised staff.

Learner Identification and Registration:

Before the examination begins the company must receive:

- Learner identity will be checked (photo ID) and stored if awarding body requires.
- Valid copy of Health and Safety Certificate (Where applying for HSE Tested/CSCS Logo)

Attendance will be recorded

Learners must not be permitted to sit an examination unless their identity can be confirmed.

Conduct During the Examination:

Invigilators are responsible for ensuring:

- The examination starts and finishes at the stated times
- Learners do not communicate with one another
- No unauthorised materials are used
- Mobile phones and electronic devices are switched off and stored away
- A quiet and controlled environment is maintained

Invigilators must remain present in the room at all times during the examination. They must not engage in activities that distract from proper supervision.

Invigilators are not permitted to provide guidance on answers or interpret examination questions.

Online and On-Screen Testing.

For online examinations (CITB, CSCS, NPORS Site Safety Supervisors, Site Managers, NVQ'S etc), Pennine Training Hub LTD will ensure:

- Secure logins are issued appropriately
- Access to examination systems is controlled
- The testing environment remains compliant with awarding organisation rules
- Technical issues are recorded and reported where necessary

Any interruption to an online examination will be documented.

Malpractice and Irregularities.

Examples of malpractice include:

- Cheating or copying
- Use of unauthorised materials (Chat GPT, Mobile Phones etc)
- Impersonation
- Disruptive behaviour
- Attempting to remove examination materials

If malpractice is suspected the following steps will be implemented:

1. The invigilator will make a factual written record of the incident.
2. Any unauthorised materials will be retained where appropriate.
3. The learner will normally be allowed to continue unless the situation prevents this.
4. Management will be informed immediately.

All cases will be investigated in line with company procedures and reported to an appropriate organisation if required.

Reasonable Adjustments.

Where a learner has approved reasonable adjustments (see reasonable Adjustments policy):

- Evidence must be in place prior to the examination
- Arrangements must be implemented exactly as authorised
- Confidentiality must be maintained

Completion of Examination.

At the end of the examination:

- Learners must stop immediately when instructed
- All papers and materials will be collected, counted and marked.
- Examination materials will be returned or uploaded in accordance with awarding body requirements
- Specific Person Vue procedures will be followed for ITC Testing.

No learner may remove examination materials from the room.

Record Keeping.

Complete Site Skills LTD and Pennine Training hub representatives will maintain:

- Examination attendance registers
- Invigilator records
- Incident reports
- Secure storage logs

Records will be retained and stored in line with the company's data protection procedures and in accordance with GDPR regulations and Awarding Body Requirements.

Training and Monitoring.

All invigilators will receive internal briefing and adequate training, as per awarding body requirements, prior to carrying out duties, updates will be provided where awarding body requirements change. Management and IQA's may carry out spot checks of examination sessions to ensure compliance with this policy.

Pennine Training Hub LTD, will carry out light-touch invigilation checks as part of its ongoing assurance of assessment integrity. These checks involve brief, proportionate monitoring of the assessment environment to confirm that candidates are working independently, that no unauthorised materials are present, and that assessment conditions remain compliant with awarding-body requirements. Light-touch checks are non-intrusive, recorded using a simple observation note or checklist, and are designed to provide additional assurance without disrupting the assessment process. Where concerns are identified, a full invigilation review or formal investigation may be initiated.

For e learning courses, In certain circumstances, we may contact candidates by phone or email and ask them questions relating to the course to verify it was them that undertook it.

It is company policy that a minimum of 10% of work will be submitted to an IQA, however the company does have an IQA risk assessment where ratio percentages have been considered and copies of our IQA sampling risk assessment is available upon request.

Invigilation requirements.

Failure to follow this policy may result in:

- Removal from invigilation duties
- Disciplinary action
- Reporting to the relevant awarding organisation
- Termination of employment or contract where appropriate

All testing must be invigilated by a registered and certificated invigilator to manage the testing process and to prevent cheating and/or collusion between the Candidates. For the avoidance of doubt, the role of the invigilator is solely to ensure the test is conducted correctly. Only administration activities linked to the actual recording of tests times is allowed. No other centre or general administration should take place during testing.

Invigilators can be the Chief Administrator or Administrator. This person cannot be any individual suspended or terminated from any CITB provision or implicated in malpractice and/or fraudulent practice with any other regulated scheme or Awarding Organisation.

You must ensure that candidates are aware of their responsibilities, as follows:

• They must not communicate with anyone other than the invigilator during the test.
• To communicate with the invigilator, they must first raise their hand
• There must not be any eating, drinking, or smoking during testing.

The invigilator must always be physically present in the test room and be in full view of the CCTV cameras during the entire testing process. The use of viewing windows or CCTV test monitoring is not permitted. Without exception the invigilator must not use or have any personal electronic device on their person during the testing process.

Any irregularities during the testing process must be documented and reported to CITB, immediately. Invigilators should be at least 2m in distance from the Candidates undertaking their test and be fully covered by the CCTV in the test room.

Administration.

Candidates must arrive at the test centre no later than 15 minutes before their scheduled appointment time, with a valid form of identification to allow for registration and verification procedures. The company may, at its discretion, process late arrivals up to a maximum delay of 30 minutes; however, this is not guaranteed. Refunds will not be issued for late attendance, missed appointments, or failure to comply with arrival requirements.

All Testing will comply with awarding organisation requirements, and any candidate misconduct will be reported to the relevant organisation immediately.

Health, Safety and Environment, Transparent Test Costs.

Under the current Scheme rules, we must inform you that the cost for Health, Safety and Environmental tests from Person Vue is **£23.50+VAT**. This rate has been increased to reflect delivery at company premises and to cover essential overheads, including administrative support, invigilation, and the provision and maintenance of technical equipment.

Breach of Policy.

Failure to follow this policy may result in:

- Removal from invigilation duties.
- Disciplinary action.
- Reporting to the relevant awarding organisation.
- Termination of employment or contract where appropriate.

38. Malpractice & Maladministration Policy.

Pennine Training Hub LTD, we take the integrity of our training and assessment seriously. Our qualifications support learners into employment within safety-critical industries, and it is essential that all results are achieved fairly and honestly.
We have a zero-tolerance approach to malpractice and maladministration. Any concerns will be investigated properly, fairly and without delay.

What We Mean by Malpractice and Maladministration.

Malpractice is any deliberate action that compromises the integrity of an assessment or qualification.
Examples include:

- Cheating or copying in an exam
- Plagiarism
- Falsifying assessment evidence
- Impersonation
- Altering results
- Assisting learners unfairly

Maladministration is usually an unintentional failure to follow the correct process.

Examples include:

- Failing to follow examination procedures
- Poor record keeping
- Not applying approved reasonable adjustments correctly
- Administrative errors that affect certification

Who This Applies To.

This policy applies to:

- Learners
- Invigilators, Tutors, Assessors and Internal Quality Assurers
- Directors and administrative staff
- Any subcontractors working on behalf of Pennine Training Hub LTD

Reporting a Concern.

Anyone who suspects malpractice or maladministration must report it immediately to company management.
Reports can be made:

- In person
- In writing
- By email

All concerns will be treated confidentially and without prejudice.

How We Investigate.

Where a concern is raised, the company will:

1. Record the details of the allegation.
2. Secure any relevant evidence.
3. Speak to those involved.
4. Make a fair and objective decision.

If required, we will notify the relevant awarding organisation and follow their procedures.
Learners or staff involved will be given the opportunity to respond before any final decision is made.

Possible Outcomes.

Depending on the severity of the issue, actions may include:

- Issuing a warning
- Voiding an assessment result
- Disqualification from a qualification
- Disciplinary action
- Termination of employment or contract
- Reporting to the awarding organisation or regulator

Record Keeping.

We will keep clear records of:

- Allegations
- Evidence reviewed
- Investigation findings
- Actions taken

Records will be stored securely in line with our data protection procedures and that of current GDPR Requirements.

This policy will be reviewed annually or sooner if required by changes to awarding body or any regulatory requirements change.

39. Training Materials Review Policy.

The purpose of this policy is to make sure all training materials used by Pennine Training Hub are accurate, up to date and compliant with current UK legislation, British Standards and awarding or governing body requirements.

This policy applies to all training materials delivered by the company, including manuals, PowerPoint presentations, handouts, videos and assessments.

We are committed to keeping all training content in line with current legislation, industry best practice and governing body requirements, including (where applicable):

- Health and Safety Executive (HSE) guidance
- Governing Body requirements
- Relevant British Standards Institution (BSI) standards
- Current UK legislation.

Training materials will not be delivered if they are known to be out of date or non-compliant.

Review Schedule.

As a company we will ensure that all training materials will be reviewed.

- Annually as a minimum
- Immediately following any significant change in legislation
- When British Standards are updated.
- When awarding body's requirements change.
- Following internal audit (IQA) findings or external quality assurance feedback.

A training materials register will be maintained showing a table of amendments showing:

- Title.
- Version number.
- Last review date.
- Next review date.
- Reviewer name.

Review Process.

1. The Director is responsible for maintaining the review schedule.
2. Changes in legislation or standards will be monitored on an ongoing basis.
3. Materials will be checked against current legal requirements and relevant standards.
4. Any required updates will be made and recorded.
5. Revised materials will be version controlled and previous versions archived.
6. Updated materials must be approved before being re-issued to trainers.
7. All major changes will be notified to any relevant organisations where applicable via email to the most relevant person(s).

Responsibilities.

- The Director and Training Manager oversees the review process.
- The chosen Internal Quality Assurer will review materials as they see fit, and inline with governing body requirements.
- Tutors and assessors must report any content they believe is out of date.
- Management will ensure adequate resources are available to maintain compliance.
- To ensure the trainers knowledge is up to date Pennine Training Hub will maintain CPD logs.
- The instructor/Assessor must ensure any plant or equipment is accompanied by the correct operator/user manual and is compliant with standards and test specification.

Monitoring

As a company we will ensure that we give clients the best and most relevant information to ensure they are competent and well informed for the job roles they are preforming. Compliance with this policy is critical and information standards will be checked through our internal audits and quality assurance processes.

If required the company will inform the governing body of any changes to content or any incorrect material they may provide via email addressed to the relevant persons.

Invigilation requirements.

Failure to follow this policy may result in:

- Removal from invigilation duties
- Disciplinary action
- Reporting to the relevant awarding organisation
- Termination of employment or contract where appropriate

All testing must be invigilated by a registered and certificated invigilator to manage the testing process and to prevent cheating and/or collusion between the Candidates. For the avoidance of doubt, the role of the invigilator is solely to ensure the test is conducted correctly. Only administration activities linked to the actual recording of tests times is allowed. No other centre or general administration should take place during testing.

Invigilators can be the Chief Administrator or Administrator. This person cannot be any individual suspended or terminated from any CITB provision or implicated in malpractice and/or fraudulent practice with any other regulated scheme or Awarding Organisation.

You must ensure that candidates are aware of their responsibilities, as follows:

• They must not communicate with anyone other than the invigilator during the test.
• To communicate with the invigilator, they must first raise their hand
• There must not be any eating, drinking, or smoking during testing.

The invigilator must always be physically present in the test room and be in full view of the CCTV cameras during the entire testing process. The use of viewing windows or CCTV test monitoring is not permitted. Without exception the invigilator must not use or have any personal electronic device on their person during the testing process.

Any irregularities during the testing process must be documented and reported to CITB, immediately. Invigilators should be at least 2m in distance from the Candidates undertaking their test and be fully covered by the CCTV in the test room.

40, Cancellations, Refunds and Payment Terms.

1)Cancellation over 14 working days from job date, 100% of order confirmation Refunded/Monies Paid
2)Cancellation 7-14 working days from Job date = 50% of order confirmation Refunded/Monies Paid
3)Cancellation up to 7Working= upto 100% of course cost **NONREFUNDABLE**
4)PAYMENT TO BE MADE UP FRONT TO CONFIRM BOOKING UNLESS OTHERWISE AGREED IN WRITING.
5)PAYMENT CAN BE MADE BY CASH OR BANK TRANSFER.
6)Certification is not applied for/sent until invoice is settled.
7)If our training instructor attends your premises for on-site training but is unable to commence or complete due to the course requirements not being met, the course fees remain payable in full.
8)All Courses require certain items for tests to commence (CHICAINS,SLOPES, Varying Ground, Racking, Machinery etc) the client must provide these if instructors attend a premises, failure to comply will result in cancellation with no refund.
9)In the event of late payments and account holders exceeding 30Days, any discounted rates may be withdrawn and full course and millage costs at the current rate (Fuel, £1.00 per mile, after 20 miles of Manchester office or Penrith Office) are chargeable, plus 3% base rate interest added daily after overdue letter is issued.
10)Candidates are required to achieve a minimum pass mark for both a theory and practical assessment. No monies will be refunded in the event of a delegate failing an assessment.
11)Candidates must attend the course/test on time, and in a fit state, failure to do so will result in no refunds of monies paid.
12)Operator Certification and NVQ'S will not be registered until full or partial payment is received. Where partial payment is taken (this will be stated on the first invoice), the certificates will not be applied for until the full outstanding payment is taken, unless otherwise agreed in writing.
13)**NVQ payments are non-refundable, and all outstanding fees must be paid in full within a six-month period**, regardless of whether the candidate has completed the qualification. It is the candidate's responsibility to ensure that all NVQ requirements are met in accordance with the agreed assessment plan and the induction process.
14)**Pennine Training Hub, CCM, and Complete Site Skills accept no responsibility for candidates failing to complete the NVQ process.** In circumstances where a candidate does not complete the qualification due to insufficient evidence, lack of engagement, or failure to upload required documentation to the online portal, no refunds will be issued and any outstanding balance will remain payable in full.
15) **Applicants requiring a 2-Year Trained Operator CSCS Card**, must hold a current (within 2 years) and appropriate CSCS Health and Safety Test (Manager, Supervisor or Operative). Evidence of this must be presented to the instructor prior to card application.

Where valid proof is not provided(and copy retained), a traditional 5-Year NPORS card will be issued, and the CSCS card fee will be chargeable. **NOCN online accreditations are NOT accepted.**

41. Internal auditing and quality assurance Policy.

The purpose of this policy is to ensure that Complete Site Skills/Pennine Training Hub, maintains high standards of training, assessment, internal quality assurance, and compliance. This policy outlines how internal audits are conducted, how assessment decisions are monitored, and how learner and staff data is protected in accordance with UK GDPR and the Data Protection Act 2018.

This policy applies to:

- All staff, assessors, internal quality assurers (IQAs), contractors and associates.
- All learners enrolled with the company and associates.
- All qualifications, training programmes and assessment activities.
- All data collected, processed or stored as part of internal auditing and quality assurance.
- All awarding-body requirements and regulatory standards.

We are committed to:

- Ensuring fair, valid, reliable and consistent assessment decisions.
- Maintaining compliance with awarding-body and regulatory requirements.
- Protecting learner and staff data under UK GDPR.
- Providing clear, accurate and up-to-date records.
- Supporting continuous improvement across all training and assessment activities.
- Ensuring transparency and accountability in all quality assurance processes.

Management will:

- Plan and schedule internal audits.
- Ensure adequate resources for quality assurance activities.
- Review audit findings and implement improvements.
- Ensure staff understand and follow this policy.
- Maintain compliance with awarding-body requirements.

Internal Quality Assurer (IQA) Responsibilities.

IQAs will:

- Sample assessments regularly and fairly.
- Check assessor decisions for accuracy, consistency and validity.
- Verify that assessment records meet awarding-body standards.
- Provide feedback, support and standardisation for assessors.
- Record all IQA activity securely and in line with GDPR.
- Identify risks, errors or non-compliance.
-

Assessor Responsibilities.

Assessors will:

- Carry out assessments fairly and accurately.
- Maintain clear, complete and secure assessment records.
- Respond to IQA feedback and attend standardisation meetings.
- Report concerns relating to quality or compliance.

Peer Audits and External Independent IQAs.

We will regularly undertake internal peer audits, to maintain consistency and accuracy across assessors and programmes.

In addition, external, independent Internal Quality Assurers (IQAs) are appointed to:

- Review assessment decisions.
- Verify compliance with awarding-body standards.

- Ensure fairness, validity and reliability of assessment practice.

External IQAs are granted access only to the records necessary to carry out their duties. All access is controlled, proportionate, and fully compliant with UK GDPR and the company's Data Protection Policies.

Internal Audit Process.

Internal audits may include:

- Sampling learner portfolios.
- Reviewing assessment decisions.
- Checking assessor and IQA documentation.
- Reviewing policies, procedures and training materials.
- Checking compliance with awarding-body requirements.
- Reviewing data protection and GDPR compliance.
- Identifying risks, errors or areas for improvement.

Audit findings will be recorded, reviewed by management, and used to improve systems and staff performance.

IQA Activity for ITC.

- Completed once a month.
- Test Log is present and accurate.
- CCTV Functionality including Date and Time accuracy.
- Test log start and finish times align with CCTV stamp.

The internet test centre candidate information chart must be completed.

42, CCTV, Photography & Audible Recording Policy.

Complete Site Skills Ltd, operating as the registered training provider for Pennine Training Hub Ltd, uses Closed Circuit Television (CCTV) systems throughout any of our company premises. These systems record both visual and audio data. In addition, it is established company practice for Instructors and other company representatives to capture video and/or audio recordings on mobile devices for the purposes of ensuring the safety, security, integrity and compliance of all training, assessment and testing activities. Video and audio recordings may also be used during telephone calls, face-to-face meetings and online meetings such as Teams and Zoom etc. Where necessary for operational, quality assurance or safeguarding purposes.

This policy sets out how CCTV and audio-visual recordings are used, monitored, stored and shared in accordance with UK GDPR, the Data Protection Act 2018, and the organisation's registration with the Information Commissioner's Office (ICO).

None offensive photos or videos, containing good practices may be published on social media for advertising purposes.

This policy applies to.

- All learners, candidates, visitors, staff, assessors, IQAs and contractors.
- All training rooms, test rooms, communal areas, entrances, exits and external areas.
- All CCTV systems, audio-visual recording devices and storage systems.
- All awarding-body regulated assessments and CITB Internet Test Centre (ITC) activities.
- Any Meetings and Convocations, weather in person or using online or telephone platforms.

CCTV Coverage and Recording.

- The centre operates **continuous CCTV monitoring** across all areas on any premises associated with the company.
- CCTV captures **both visual and audible** recordings where installed.
- All Test Rooms are subject to **continuous recording**, including:
  - **15 minutes before** the scheduled Test start time.
  - **Throughout the Test.**
  - **15 minutes after** the Test has ended.

CCTV systems must always display the correct date and time, and these must be synchronised with:

  - Test Stations.
  - Test Logs.
  - Internal timing systems.
- The organisation maintains an internal procedure to ensure **CCTV timestamps and Test Station clocks remain aligned** at all times.
- If company associates undertake meetings they may be recorded via separate devices, for Quality, Training and monitoring purposes.

Data Retention and Storage.

- All CCTV footage is retained for **30 days** as standard.
- Systems must be capable of storing **a minimum of 30 days of continuous footage** without interruption.

After 30 days, footage is automatically overwritten unless required for:

- Awarding body audits.
- CITB/EUSR compliance checks.
- Investigations.
- Safeguarding or misconduct cases.
- Legal or regulatory requirements.

Sharing and Disclosure of Footage.

CCTV footage may be shared with:

- Awarding bodies (e.g., CITB) for audit, compliance or investigation purposes.
- Regulatory authorities where legally required.
- Law enforcement where appropriate.
- Internal Quality Assurance and authorised staff for compliance monitoring.
- Company associates (Contractors and staff)
- Footage will **never** be shared with unauthorised third parties.

CITB Internet Test Centre (ITC) Requirements.

As a CITB-approved Internet Test Centre:

- CCTV must **continuously record** all Test Room activity as required by CITB.
- Footage must clearly show:
  - Candidate behaviour.
  - Test environment.
  - Any interactions within the Test Room.

If any CCTV camera or system fails, including partial failure.

- All testing must stop immediately.
- CITB must be notified without delay.

- Testing **cannot resume** until **written approval** is received from CITB confirming the system is compliant and operational.

System Maintenance and Monitoring.

- CCTV systems are checked regularly to ensure:
  - Correct date and time.
  - Continuous recording.
  - Audio and video clarity.
  - Secure storage.
  - No blind spots in Test Rooms.
- Any faults must be reported immediately to the Centre Manager and logged.

Data Protection and Privacy.

CCTV is used strictly for:

- Safety and security.
- Assessment integrity.
- Compliance with awarding-body requirements.
- Prevention and detection of malpractice.

- Signage is displayed throughout the premises informing individuals that CCTV is in operation.
- All data is processed lawfully under the organisation's **ICO registration** and **Data Protection Policy**.

Access to Footage.

If it is not being used for training or monitoring, access to CCTV footage and audio recordings are restricted to authorised personnel only, including:

- Centre Manager.
- Companies associated with Pennine Training Hub
- Data Protection Lead.
- Internal Quality Assurers.
- Awarding-body representatives (where required for monitoring Purposes).
- Authorities.
- Those Concerned.

All access is logged and monitored.

Policy Review.

This policy is reviewed **annually** or sooner if:

- Awarding-body rules change.
- New CCTV systems/Audible monitoring systems are installed.
- Data protection legislation is updated.

43, Quality Assurance Policy.

Purpose.

This policy sets out how Complete Site Skills/Pennine Training Hub maintains the highest standards of assessment practice, learner support, and regulatory compliance. It ensures that all qualifications delivered by the organisation meet the requirements of the relevant awarding bodies, industry regulators, and internal quality expectations.

This policy applies to:

- All assessors, tutors, trainers, and Internal Quality Assurers (IQAs).
- All qualifications, training programmes, and assessment activities.

- All staff involved in the delivery, assessment, administration, and quality assurance of qualifications.

Quality Assurance Commitment.

Complete Site Skills/Pennine Training Hub is committed to:

- Fair, valid, reliable, and consistent assessment decisions
- Transparent and robust internal quality assurance processes
- Maintaining compliance with awarding-body standards, qualification specifications, and regulatory frameworks
- Continuous improvement across all training and assessment activities
- Ensuring assessors and IQAs remain occupationally competent and up to date

Internal Quality Assurance Structure.

Complete Site Skills employs two separate Internal Quality Assurers (IQAs) who are responsible for maintaining the integrity and consistency of assessment decisions across all qualifications.

Our IQA team:

- Conducts planned and risk-based sampling of candidate portfolios.
- Reviews assessment decisions to ensure validity, reliability, sufficiency, authenticity, and currency.
- Supports assessors through standardisation, feedback, and professional development.
- Ensures assessment practice aligns with awarding-body requirements and internal policies.
- Monitors assessor performance and identifies areas for improvement.

IQA Sampling and Audit Approach.

Internal Quality Assurance activities are carried out in accordance with:

- The organisation's **assessment risk assessment**, which determines sampling levels and frequency.
- Awarding-body standards, specifications, and quality assurance strategies.
- Regulatory requirements such as Ofqual, SQA Accreditation, or other relevant bodies.

Sampling includes:

- Interim and summative sampling.
- Assessor performance monitoring.
- Candidate-specific sampling based on risk.
- Observation of assessment practice.
- Review of assessment records, feedback, and evidence.

External Quality Assurance.

Complete Site Skills/Pennine Training Hub, work collaboratively with awarding-body External Quality Assurers (EQAs) also known as "Monitors". We ensure:

- Full access to required records, portfolios, staff, and systems.
- Transparent communication and timely submission of requested evidence.
- Implementation of any actions or recommendations arising from EQA visits.

Standardisation.

Regular standardisation meetings are held to:

- Ensure consistent interpretation of standards.
- Share best practice.
- Review assessment decisions and evidence requirements.
- Address any emerging issues or changes in qualification specifications.

Continuous Improvement.

Findings from IQA activity, EQA reports, learner feedback, and assessor performance reviews are used to:

- Improve training and assessment delivery.
- Update policies and procedures.
- Inform staff CPD and training plans.
- Strengthen compliance and operational effectiveness.

Roles and Responsibilities.

Assessors.

- Deliver fair and consistent assessment.
- Maintain accurate and complete assessment records.
- Engage in standardisation and CPD.

Internal Quality Assurers.

- Conduct sampling and audits in line with risk and awarding-body requirements.
- Provide constructive feedback and support to assessors.
- Maintain accurate IQA documentation.
- Ensure compliance with all regulatory and awarding-body standards.

Company Management.

- Ensure adequate staffing, resources, and training.
- Oversee compliance and quality assurance performance.
- Review and approve quality improvement actions.

Material Changes.

Under CITB and other awarding body rules we must make notifications of any significant changes, such as

- Loss of key ITC staff that will limit or prevent the delivery of testing
- Bankruptcy
- Issuing incorrect testing results.

Review of Policy.

This policy is reviewed annually or sooner if required by:

- Changes in awarding-body requirements.
- Regulatory updates.
- Internal audit findings.

44. Modern Slavery Policy.

Purpose.

This policy sets out Complete Site Skills/Pennine Training Hubs' commitment to preventing modern slavery, human trafficking, forced labour, and exploitation in all areas of our operations, training delivery, supply chains, and partnerships. We uphold the principles of the **Modern Slavery Act 2015** and expect the same high standards from all individuals and organisations we work with.

This policy applies to:

- All employees, directors, contractors, associates, assessors, tutors, and Internal Quality Assurers
- All learners, visitors, and partner organisations.
- All suppliers and subcontractors providing goods or services to Complete Site Skill/Pennine Training Hub.

Policy Statement.

Complete Site Skills/Pennine Training Hub, has zero tolerance for modern slavery or human trafficking. We are committed to:

- Acting ethically and with integrity.
- Ensuring robust systems and controls to prevent exploitation.
- Protecting vulnerable individuals, including young persons and learners.
- Promoting transparency across our supply chains and training operations.

Definitions.

Under the Modern Slavery Act 2015, modern slavery includes:

- Human trafficking.
- Forced or compulsory labour.
- Servitude.
- Exploitation, including financial, sexual, or labour exploitation.
- Deprivation of liberty for personal or commercial gain.

Our Responsibilities.

Management:

- Ensure this policy is implemented, monitored, and reviewed.
- Conduct due diligence on suppliers and partners.
- Ensure safeguarding and reporting procedures are followed.

Staff, Assessors, and IQAs:

- Remain vigilant to signs of exploitation.
- Report concerns immediately.
- Maintain professional boundaries and safeguarding standards.
- Ensure learners are treated fairly, respectfully, and without coercion.

Suppliers and Partners:
Must confirm that:

- They do not engage in modern slavery or human trafficking
- Their own supply chains are free from exploitation
- They comply with the Modern Slavery Act 2015

Risk Management & Due Diligence.

Complete Site Skills undertakes proportionate checks on:

- Recruitment and employment practices.
- Subcontractors and training partners.
- Suppliers of equipment, facilities, and services.
- Any organisation involved in learner placements or work experience.

We ensure:

- All staff have the right to work in the UK.
- No recruitment fees are charged to workers.
- Employment is freely chosen.
- Learners are never coerced, threatened, or exploited.

Safeguarding & Reporting Concerns.

As Modern slavery is treated as a safeguarding concern.

Staff must report immediately if they suspect:

- A learner or worker is being controlled, threatened, or exploited.
- Someone is working against their will.
- Documents (e.g., passports) are being withheld.
- Signs of physical, emotional, or financial abuse.

Reports should be made to:

- The **Designated Safeguarding Lead (DSL),** Daniel Bistacchi**.**
- Senior Management.
- Police or local safeguarding authorities where necessary.

All reports are handled sensitively and confidentially.

Training & Awareness.

Complete Site Skills and Pennine Training Hub ensures:

- Staff receive safeguarding and modern slavery awareness training/briefings.
- IQAs and assessors understand how exploitation may present in training environments.
- Learners know how to raise concerns safely.

Compliance & Monitoring.

We regularly review.

- Supplier compliance.
- Safeguarding reports.
- Recruitment and employment practices.
- Training and assessment environments.

Any supplier or partner found to be involved in modern slavery will have their contract terminated immediately.

Review of Policy.

This policy is reviewed annually or sooner if:

- Legislation changes.
- Safeguarding concerns arise.
- Operational or supply-chain risks change.

45. Data Protection Policy.

This policy outlines how Complete Site Skills collects, stores, processes, and protects personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act

2018. It ensures that all personal information handled by the organisation is managed lawfully, fairly, and transparently.

Information Commissioner's Office (ICO) Registration.

Complete Site Skills is registered with the Information Commissioner's Office (ICO) as a data controller and has overall responsibility of the data obtained. The ICO registration confirms our commitment to lawful data handling and compliance with data protection legislation.

This policy applies to:

- All employees, directors, contractors, assessors, tutors, and Internal Quality Assurers.
- All learners, clients, suppliers, and partner organisations.
- All personal data processed in relation to training, assessment, administration, and business operations.

Data Protection Principles.

Complete Site Skills adheres to the seven key principles of UK GDPR. Personal data must 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. Stored no longer than necessary
6. Processed securely
7. Handled with accountability, demonstrating compliance at all times

Types of Data We Collect.

We may collect and process:

- Personal identification data (name, address, contact details etc).
- Employment and qualification information.
- Assessment and training records.
- Safeguarding information where required.
- Financial and administrative data.
- CCTV images (where applicable).

Sensitive or special category data is only processed where strictly necessary and with appropriate safeguards.

Lawful Basis for Processing.

We process personal data under one or more lawful bases:

- Contract – to deliver training, assessment, and certification.
- Legal obligation – compliance with awarding bodies, funding rules, and statutory requirements.
- Legitimate interests – operational and quality assurance activities.
- Consent – where required for optional services or communications.
- Vital interests – safeguarding or emergency situations.

Data Storage & Security.

Complete Site Skills management, ensures that all personal data is:

- Stored securely using password-protected systems and encrypted platforms.
- Accessed only by authorised staff.
- Protected from loss, misuse, unauthorised access, or disclosure.
- Backed up and retained in line with our data retention schedule.

Physical documents are stored in locked, controlled-access areas.

Sharing of Personal Data.

We may share data with:

- Awarding bodies
- External Quality Assurers (EQAs)
- Regulatory authorities
- Employers or placement providers (where relevant)
- IT and system providers under data processing agreements

We never sell personal data or share information with people we are unauthorised to without permission off the individual/company concerned.

All third parties must comply with UK GDPR and maintain appropriate security measures.

Data Subject Rights.

Individuals have the right to:

- Access their personal data
- Request correction of inaccurate information
- Request deletion (where legally applicable)
- Restrict or object to processing
- Request data portability
- Withdraw consent (where consent is the lawful basis)

Requests are handled within statutory timeframes.

Data Breaches.

Any suspected or actual data breach must be reported immediately to senior management. Where required, Complete Site Skills will:

- Notify the ICO within 72 hours.
- Inform affected individuals without undue delay.
- Record all breaches in the internal breach log.

Staff Responsibilities.

All staff must:

- Follow this policy and all related procedures.
- Complete data protection and safeguarding training.
- Handle personal data securely and professionally.
- Report any concerns or breaches immediately.

Retention & Disposal.

Personal data is retained only for as long as necessary to:

- Deliver training and assessment.
- Meet awarding-body and regulatory requirements.
- Fulfil legal obligations.

Data is securely destroyed when no longer required.

Policy Review.

This policy is reviewed annually or sooner if:

- Legislation changes.
- ICO guidance updates.
- Internal or external audit findings require amendments.

Directors Statement.

- **I fully acknowledge my legal responsibility as the Director with responsibility to implement this document and policies within this company:**

Name: Daniel Bistacchi **Signature:** **Date:** 05/04/2026

Name: **Signature:** **Date:**