

(Registered Company Number: 11948770)

1mpact Ltd

Policies, Rules and Codes of Conduct



Registered Office
8 Windermere Road
Kettering, Northants

[Revision 1 –5th April 2019](#)

ABOUT US

Impact LTD (referred to as “The Company” in this Handbook) was established on 16th April 2019 by Directors James Bambridge & Luke Doughty. We are a Company Limited by Guarantee with Not for Profit Articles based on our social principles and values to provide education services to support isolated and hard to reach learners.

We offer a niche service including a wide range of Innovative Educational Management, Bid Writing & Consultancy Services specifically customized to our clients as well as our educational delivery of courses under range of grants and funded services.

We wish to support communities, EU citizens & Migrants to assist them to develop confidence to integrate into the wider communities via our Innovative Service offer using a unique online Learning programmes aimed at improving English Skills to aid Social Inclusion.

OUR OBJECTIVES

The objects of the Company are to carry on activities which benefit the community and (without limitation) to

- Local Communities to tackle Isolation and improve social inclusion.
- Individuals to empower them and provide life skills and built confidence.
- Individuals and Communities in urgent need of educational support to integrate into society.
- Individuals to enable them to gain language and educational Skills in order to develop Social Mobility and improve employment prospects.
- Local Community Based organisations needing to work in collaboration with educators to support their clients.

OUR VALUES

We have strong values, integrity & ethics. The Company has been primarily established to support High Quality Educational Projects and empowering organisations, partners, communities and Learners. We believe in the Social power of education and aim to help make a positive difference to people’s lives and breakdown the many social barriers in our communities by supporting and developing learning solutions.

MANAGEMENT

| | |
|-----------------|----------------------------|
| James Bambridge | Director & 50% Shareholder |
| Luke Doughty | Director & 50% Shareholder |

D-U-N-S Number: 225007381

UKPRN Number: 10083202

(Registered Company Number: 11948770)



**CERTIFICATE OF INCORPORATION
OF A
PRIVATE LIMITED COMPANY**

Company Number **11948770**

The Registrar of Companies for England and Wales, hereby certifies that

1IMPACT LIMITED

is this day incorporated under the Companies Act 2006 as a private company, that the company is limited by guarantee, and the situation of its registered office is in England and Wales

Given at Companies House, Cardiff, on **16th April 2019**



* N11948770O *



Companies House



THE OFFICIAL SEAL OF THE
REGISTRAR OF COMPANIES

The above information was communicated by electronic means and authenticated by the Registrar of Companies under section 1115 of the Companies Act 2006

Registered Office
8 Windermere Road
Kettering, Northants

(Registered Company Number: 11948770)

1IMPACT LTD - MEMORANDUM OF ASSOCIATION

COMPANY NOT HAVING SHARE CAPITAL

**Memorandum of association of
1IMPACT LIMITED**

Each subscriber to this memorandum of association wishes to form a company under the Companies Act 2006 and agrees to become a member of the company.

| Name of each subscriber | Authentication |
|--------------------------------|------------------------------|
| Luke Doughty | Authenticated Electronically |
| James Bambridge | Authenticated Electronically |

Dated: 15/04/2019

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(Registered Company Number: 11948770)

COMPANY POLICIES

- Anti-Bullying Protection Policy
- Anti-Fraud Policy
- Bribery Policy
- Complaints Policy
- Data Protection & Information Security Policy
- Environmental Policy
- Equality & Diversity Policy
- Health & Safety Policy
- Learning & Development Policy
- Modern Day Slavery & People Trafficking Policy
- Safeguarding & Welfare Policy
- Social Media Policy
- Whistleblowing Policy

Anti-Bullying Protection Policy

Statement of intent

1mpact Ltd is committed to providing a caring, friendly and safe environment for all of our staff and users of our services.

Bullying of any kind is unacceptable. If bullying does occur, it should be immediately reported to the Directors. Incidents will be investigated by the Management Committee and The Company with promptly and effectively. A warning notice will be issued to the person in question with the requirement that the practice stops. Sanctions may also be imposed as appropriate.

We are a TELLING Company. This means that anyone who knows that bullying is happening is expected to report the matter immediately.

What is bullying?

Bullying is the use of aggression with the intention of hurting another person. Bullying results in pain and distress to the victim.

Bullying can be:

- Emotional - being unfriendly, excluding (emotionally and physically) sending hurtful text messages, tormenting, (e.g. hiding football boots/shin guards, threatening gestures)
- Physical pushing, kicking, hitting, punching or any use of violence
- Racist - racial taunts, graffiti, gestures
- Sexual - unwanted physical contact or sexually abusive comments
- Homophobic - because of, or focussing on the issue of sexuality
- Verbal - name-calling, sarcasm, spreading rumours, teasing.

Why is it important to respond to bullying?

Bullying hurts. No one deserves to be a victim of bullying. Everybody has the right to be treated with respect. Individuals who are bullying need to learn different ways of behaving.

The impact upon a child, young person or Vulnerable Adult can be devastating and in some cases affect all aspects of their life; in extreme circumstances it can lead to suicide threats or even attempts.

The Company has a responsibility to respond promptly and effectively to issues of bullying.

Objectives of this policy

- All Directors & Staff should have an understanding of what bullying is
- All Directors & Staff should know what the policy is on bullying, and follow it when bullying is reported
- All Directors & Staff should know what the policy is on bullying, and what they should do if bullying arises
- We take bullying seriously. Everyone should be assured that they would be supported when bullying is reported
- Bullying will not be tolerated.

Signs and indicators

People may indicate by signs or behaviour that he or she is being bullied. Everyone should be aware of these possible signs and that they should investigate if a person:

- says he or she is being bullied
- is unwilling to attend
- becomes withdrawn anxious, or lacking in confidence
- feels ill.
- has clothes torn or equipment damaged or has possessions go 'missing'
- asks for money or starts stealing money (to pay the bully)
- has unexplained cuts or bruises
- is frightened to say what's wrong
- gives improbable excuses for any of the above.
- starts stammering
- cries themselves to sleep at night or has nightmares
- becomes aggressive, disruptive or unreasonable and starts bullying others
- stops eating
- attempts or threatens suicide or runs away.

These signs and behaviours may indicate other problems, but bullying should be considered a possibility and should be investigated.

Reporting Procedures

1. Report bullying incidents to Directors.
2. Complete an Incident Reporting Form which is held in the Companies Records
3. In cases of serious bullying, the incidents will be referred to relevant authorities for advice under the Safeguarding & Welfare Policy
4. If necessary and appropriate, the Police will be consulted
5. The bullying behaviour or threats of bullying must be investigated and the bullying stopped quickly
6. An attempt will be made to help the bully (bullies) change their behaviour
7. If mediation fails and the bullying are seen to continue we will initiate disciplinary action under The Company Policies and Codes of Conduct

Recommended action

If The Company believes it is appropriate to deal with the situation and Bullying may have taken place, we will follow the procedure outlined below.

- Raise an incident Report and attempting to establish the facts which may involve Witness reports.
- Advise all parties about the incident and keep them updated of any actions.
- Reconciliation by getting the parties together. It may be that a genuine apology solves the problem.
- If this fails/is not appropriate, the Directors will meet with the person alleging bullying, to get details of the allegation. Minutes should be taken for clarity, which should be agreed by all as a true account.
- If bullying has in their view taken place, the individual should be warned and put on notice of further action i.e. temporary or permanent suspension if the bullying continues.
- Consideration should be given as to whether a reconciliation meeting between parties is appropriate.
- The Directors should monitor the situation for a given period to ensure the bullying is not repeated.
- More serious cases may be referred to the Police and/or Social Services.

This Policy will be reviewed annually by The Company Directors

Date of last review: 1st August 2018.

Anti-Fraud Policy

1. 1mpact Ltd conducts its business in a legal and ethical manner. Company officers, employees, other members of The Company and any other associated person acting on The Company's behalf are responsible for acting honestly and with integrity by ensuring that their activities, interests and behaviours do not conflict with these obligations, regardless of their seniority.

2 The Company is committed to the prevention of fraud and to the promotion of an anti-fraud culture. We operate a zero-tolerance attitude to fraud and require staff, students and our partners to act honestly and with integrity at all times and to report all reasonable suspicions of fraud.

3 We will investigate all instances of actual, attempted and suspected fraud committed by staff, students, consultants, suppliers and other third parties and will seek to recover funds and assets lost through fraud. Perpetrators will be subject to disciplinary and/or legal action.

4 The purpose of this policy is to provide a definition of fraud and define authority levels, responsibilities for action, and reporting lines in the event of suspected, attempted or actual fraud or irregularity perpetrated by an individual against The Company.

Definition of fraud

5 The Fraud Act 2006 provides a framework within which there are three potential areas that an individual may be guilty of fraud if in breach. These are fraud by:

- a) False representation: a person commits a fraud if they intentionally and dishonestly make a false representation.
- b) Failing to disclose information: a person commits a fraud if they dishonestly fail to disclose information.
- c) Abuse of position: a person commits a fraud if they dishonestly abuse their position.

In (a) to (c) above, the individual is deemed to have committed a fraud if they make a false representation, fail to disclose information or abuse their position for the purpose of:

- i) making a gain for themselves or another; or
- ii) causing a loss to another or to expose another to a risk of loss.

Key responsibilities

6 The Directors are responsible for developing, implementing and maintaining adequate systems of internal control to prevent and detect fraud

7 Suspicion of fraud or irregularity may be captured through a number of means, including the following:

- a) Individuals reporting suspicions of fraud or irregularity to the Directors
- b) Individuals using the Whistleblowing Policy;
- c) Identification through operational procedures;
- d) Discovery through planned audit work.

Reporting non-student fraud

8 All suspected or actual incidents of fraud / irregularity allegedly perpetrated by individuals other than students or enquirers should be reported without delay to the Directors.

Reporting student fraud

9 All suspected or actual incidents of fraud concerning a student or applicant to study should be reported without delay to the Directors.

Referral to external agencies

10 At which stage a case should be reported to the police or other external agency will be decided by the Directors

11 The Company must inform the Funding Bodies Councils about actual or suspected frauds such as are detailed in their currently applicable Financial Memorandum. The Company Secretary is responsible for informing the Funding Councils of any such incidents. Liaison with other external bodies will be undertaken as appropriate to individual cases.

Prevention of further loss

13 Where initial investigation provides reasonable grounds for suspicion of fraud, the Board of Directors will decide how to prevent further loss. If the individual is an employee or student this may require the suspension of the person(s) alleged to have committed the suspected fraud / irregularity. It may be necessary to plan the timing of suspension to prevent the individual(s) from destroying or removing evidence that may be needed to support disciplinary or criminal action.

14 The Directors may, as necessary, prevent subsequent access to Company property and may authorise the withdrawal of permissions for Company computer systems.

15 The Directors will consider whether it is necessary to investigate systems other than that which has given rise to suspicion, through which the individual(s) may have had opportunities to misappropriate The Company's assets.

Establishing and securing evidence

16 The Directors will:

- a) Maintain familiarity with The Company's disciplinary procedures, to ensure that evidential requirements are met during any fraud investigation;
- b) Establish whether there is a need for audit staff to be trained in the evidence rules for interviews under the Police and Criminal Evidence Act;
- c) Ensure that staff involved in fraud investigations are familiar with and follow rules on the admissibility of documentary and other evidence in criminal proceedings. This will usually involve the appointment of specialist fraud investigators;
- d) Ensure that any Internal Audit team are able to provide advice in accordance with The Company's whistleblowing policy.

Recovery of losses

17 Recovering losses is a major objective of any fraud investigation. The Chief Auditor shall ensure that in all fraud investigations, the amount of any loss will be quantified.

Repayment of losses should be sought in all cases.

18 The Groups will, as necessary, consider seeking legal advice, for example on the freezing of the suspect's assets in cases of substantial loss and on the recovery of losses and costs through the civil courts.

This Policy will be reviewed annually by The Company Directors

Date of last review: 1st August 2018.

Bribery Policy

1.1. Impact Ltd has an anti-bribery policy to set out the responsibilities of and those who work for us in regards to observing and upholding our zero-tolerance position on bribery and corruption.

1.2. It also exists to act as a source of information and guidance for those working for The Company. It helps them recognise and deal with bribery and corruption issues, as well as understand their responsibilities.

2. Policy statement

2.1. The Company is committed to conducting business in an ethical and honest manner, and is committed to implementing and enforcing systems that ensure bribery is prevented. The Company has zero-tolerance for bribery and corrupt activities. We are committed to acting professionally, fairly, and with integrity in all business dealings and relationships, wherever we operate.

2.2. The Company will constantly uphold all laws relating to anti-bribery and corruption in all the jurisdictions in which we operate. We are bound by the laws of the UK, including the Bribery Act 2010, in regards to our conduct both at home and abroad.

2.3 The Company recognises that bribery and corruption are punishable by up to ten years of imprisonment and a fine. If our company is discovered to have taken part in corrupt activities, we may be subjected to an unlimited fine, be excluded from tendering for public contracts, and face serious damage to our reputation. It is with this in mind that we commit to preventing bribery and corruption in our business, and take our legal responsibilities seriously.

3. Who is covered by the policy

3.1 This anti-bribery policy applies to all employees (whether temporary, fixed-term, or permanent), consultants, contractors, trainees, seconded staff, home workers, casual workers, agency staff, volunteers, interns, agents, sponsors, or any other person or persons associated with us (including third parties), or any of our subsidiaries or their employees, no matter where they are located (within or outside of the UK).

3.2. In the Company context of this policy, third-party refers to any individual or organisation our company meets and works with. It refers to actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies – this includes their advisors, representatives and officials, politicians, and public parties.

3.3. Any arrangements our company makes with a third party is subject to clear contractual terms, including specific provisions that require the third party to comply with minimum standards and procedures relating to anti-bribery and corruption.

4. Definition of bribery

4.1 Bribery refers to the act of offering, giving, promising, asking, agreeing, receiving, accepting, or soliciting something of value or of an advantage so to induce or influence an action or decision.

4.2 A bribe refers to any inducement, reward, or object/item of value offered to another individual in order to gain commercial, contractual, regulatory, or personal advantage.

4.3 Bribery is not limited to the act of offering a bribe. If an individual is on the receiving end of a bribe and they accept it, they are also breaking the law.

4.4 Bribery is illegal. Employees must not engage in any form of bribery, whether it be directly, passively (as described above), or through a third party (such as an agent or distributor). They must not bribe a foreign public official anywhere in the world. They must not accept bribes in any degree and if they are uncertain about whether something is a bribe or a gift or act of hospitality, they must seek further advice from The Company Board of Directors.

5. What is and what is NOT acceptable

5.1 This section of the policy refers to 4 areas:

- Gifts and hospitality.
- Facilitation payments.
- Political contributions.
- Charitable contributions.

5.2. Gifts and hospitality

The Company accepts normal and appropriate gestures of hospitality and goodwill (whether given to/received from third parties) so long as the giving or receiving of gifts meets the following requirements:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of a business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected
- It is in compliance with local law.
- It is given in the name of the Company, not in an individual's name.
- It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- It is appropriate for the Company circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift
- It is given /received openly, not secretly.
- It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value, as pre-determined by The Company (usually in excess of £100).
- It is not offer to, or accepted from, a government official or representative or politician or political party, without the prior approval of The Company

5.3. Where it is inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to The Company manager, who will assess.

5.4. The Company recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

5.5. As good practice, gifts given and received should always be disclosed to The Company Gifts from suppliers should always be disclosed.

5.6. The intention behind a gift being given /received should always be considered. If there is any uncertainty, the advice of The Company should be sought.

5.7. Facilitation Payments and Kickbacks

The Company does not accept and will not make any form of facilitation payments of any nature. We recognise that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action. We recognise that they tend to be made by low level officials with the intention of securing or speeding up the performance of a certain duty or action.

5.8. The Company does not allow kickbacks to be made or accepted. We recognise that kickbacks are typically made in exchange for a business favour or advantage.

5.9. The Company recognises that, despite our strict policy on facilitation payments and kickbacks, employees may face a situation where avoiding a facilitation payment or kickback may put their/their family's personal security at risk. Under these circumstances, the following steps must be taken:

- Keep any amount to the minimum.
- Ask for a receipt, detailing the amount and reason for the payment.
- Create a record concerning the payment.
- Report this incident to your line manager.

5.10. Political Contributions

The Company will not make donations, whether in cash, kind, or by any other means, to support any political parties or candidates. We recognise this may be perceived as an attempt to gain an improper business advantage.

5.11. Charitable Contributions

The Company accepts (and indeed encourages) the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes.

5.12 Employees must be careful to ensure that charitable contributions are not used to facilitate and conceal acts of bribery.

5.13 We will ensure that all charitable donations made are legal and ethical under local laws and practices, and that donations are not offered/made without the approval of the compliance manager.

6. Employee Responsibilities

6.1 As an employee of The Company, you must ensure that you read, understand, and comply with the information contained within this policy, and with any training or other anti-bribery and corruption information you are given.

6.2 All employees and those under our control are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this anti-bribery policy.

6.3 If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must notify the Directors.

6.4 If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. The Company has the right to terminate a contractual relationship without recourse with an employee or business partner if they breach this anti-bribery policy

7. What happens if I need to raise a concern?

7.1 This section of the policy covers 3 areas:

- a. How to raise a concern.
- b. What to do if you are a victim of bribery or corruption.
- c. Protection.

7.2. If you suspect that there is an instance of bribery or corrupt activities occurring in relation to The Company you are encouraged to raise your concerns at as early a stage as possible. If you're uncertain about whether a certain action or behaviour can be considered bribery or corruption, speak to the Directors

7.3 The Company will familiarise all employees with its whistleblowing procedures so employees can vocalise their concerns swiftly and confidentially.

7.4 What to do if you are a victim of bribery or corruption. You must tell your compliance manager as soon as possible if you are offered a bribe by anyone, if you are asked to make one, if you suspect that you may be bribed or asked to make a bribe in the near future, or if you have reason to believe that you are a victim of another corrupt activity.

7.5 If you refuse to accept or offer a bribe or you report a concern relating to potential act(s) of bribery or corruption, The Company understands that you may feel worried about potential repercussions. The Company will support anyone who raises concerns in good faith under this policy even if investigation finds that they were mistaken.

7.6 The Company will ensure that no one suffers any detrimental treatment as a result of refusing to accept or offer a bribe or other corrupt activities or because they reported a concern relating to potential act(s) of bribery or corruption.

7.7. Detrimental treatment refers to dismissal, disciplinary action, treats, or unfavourable treatment in relation to The Company the individual raised.

7.8 If you have reason to believe you've been subjected to unjust treatment as a result of a concern or refusal to accept a bribe, you should report this immediately.

Training and communication

8.1 The Company will provide training on this policy as part of the induction process for all new employees. Employees will also receive regular, relevant training on how to adhere to this policy, and will be asked annually to formally accept that they will comply with this policy.

8.2 The Company's anti-bribery and corruption policy and zero-tolerance attitude will be clearly communicated to all suppliers, contractors, business partners, and any third-parties at the outset of business relations, and as appropriate thereafter.

8.3 The Company will provide relevant anti-bribery and corruption training to employees etc. where we feel their knowledge of how to comply with the Bribery Act needs to be enhanced. As good practice, all businesses should provide their employees with anti-bribery training where there is a potential risk of facing bribery or corruption during work activities.

Record keeping

9.1 The Company will keep detailed and accurate financial records, and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given, and understand that gifts and acts of hospitality are subject to managerial review.

Monitoring and reviewing

10.1. The Company's compliance manager is responsible for monitoring the effectiveness of this policy and will review the implementation of it on a regular basis. They will assess its suitability, adequacy, and effectiveness.

10.2 Internal control systems and procedures designed to prevent bribery and corruption are subject to regular audits to ensure that they are effective in practice.

10.3 Any need for improvement will be applied as soon as possible. Employees are encouraged to offer their feedback on this policy if they have any suggestions for how it may be improved. Feedback of this nature should be addressed to The Board of Directors.

10.4 This policy does not form part of an employee's contract of employment and The Company may amend it at any time so to improve its effectiveness at combatting bribery and corruption

This Policy will be reviewed annually by The Company Directors

Date of last review: 1st August 2018.

Complaints Policy

1mpact Ltd is committed to providing a quality service for its partners and customers by working in an open and accountable way that builds the trust and respect of all our stakeholders. One of the ways in which we can continue to improve our service is by listening and responding to the views and in particular by responding positively to complaints, and by putting mistakes right.

Therefore we aim to ensure that:

- making a complaint is as easy as possible;
- we treat a complaint as a clear expression of dissatisfaction with our service which calls for an immediate response;
- we deal with it promptly, politely and, when appropriate, confidentially;
- we respond in the right way - for example, with an explanation, or an apology where we have got things wrong, or information on any action taken etc;
- we learn from complaints, use them to improve our service, and review annually our complaints policy and procedures.

We recognise that many concerns will be raised informally, and The Company will quickly. Our aims are to:

- Resolve informal concerns quickly;
- Keep matters low-key;
- Enable mediation between the complainant and the individual to whom the complaint has been referred.

An informal approach is appropriate when it can be achieved. But if concerns cannot be satisfactorily resolved informally, then the formal complaints procedure should be followed.

Definition: The Company defines a complaint as 'any expression of dissatisfaction (with The Company, with a member of staff, or with a Company Director) that relates to The Company and that requires a formal response.'

Purpose: The formal complaints procedure is intended to ensure that all complaints are handled fairly, consistently and wherever possible resolved to the complainant's satisfaction.

Our responsibility will be to:

- acknowledge the formal complaint in writing;
- respond within a stated period of time;
- deal reasonably and sensitively with the complaint;
- Take action where appropriate.

A complainant's responsibility is to:

- bring their complaint, in writing, to The Company's attention normally within 8 weeks of the issue arising;
- raise concerns promptly and directly with a member of staff in The Company;
- explain the problem as clearly and as fully as possible, including any action taken to date;
- allow The Company reasonable time to deal with the matter;
- recognise that some circumstances may be beyond The Company's control.

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Responsibility for Action: All Staff and Directors of the Company.

Confidentiality: Except in exceptional circumstances, every attempt will be made to ensure that both the complainant and The Company maintain confidentiality. However the circumstances giving rise to the complaint may be such that it may not be possible to maintain confidentiality (with each complaint judged on its own merit). Should this be the case, the situation will be explained to the complainant.

Monitoring and Reporting: The Directors will receive annually an anonymized report of complaints made and their resolution.

Formal Complaints Procedure

Stage 1

In the first instance, if you are unable to resolve the issue informally, you should write to the member of staff who The Company with you, or their manager, so that he or she has a chance to put things right. If your complaint concerns a Director of the Company, rather than a member of the Company's staff, you should write formally to the individual concerned. In your letter you should set out the details of your complaint, the consequences for you as a result, and the remedy you are seeking.

You can expect your complaint to be acknowledged within 4 working days of receipt. You should get a response and an explanation within 15 working days. If you are unsure which member of the Company staff to write to, your complaint should be sent to the Directors

Our contact details can be found on our Website.

Stage 2

If you are not satisfied with the initial response to the complaint then you can write to The Company's Chief Executive and ask for your complaint and the response to be reviewed. You can expect the Chief Executive to acknowledge your request within 4 working days of receipt and a response within 15 working days.

The Company's aim is to resolve all matters as quickly as possible. However, inevitably some issues will be more complex and therefore may require longer to be fully investigated. Consequently timescales given for handling and responding to complaints are indicative. If a matter requires more detailed investigation, you will receive an interim response describing what is being done to deal with the matter, and when a full reply can be expected and from whom.

Final Stage

If you are not satisfied with the subsequent reply, then you have the option of seeking assistance from any external bodies.

This Policy will be reviewed annually by The Company Directors

Date of last review: 1st August 2018

Data Protection & Information Security Policy

1. Introduction

Impact Ltd has a statutory duty to comply with the requirements of the Act as it collects personal data when conducting its business. The Information Commissioner's Office (ICO) is responsible for regulating and enforcing the Act. The Data Protection Act 1998 (the Act) aims to protect all personal data which is collected, processed, stored and disposed of by an organisation.

2. Aim

- 2.1. The aim of this policy is to ensure The Company is compliant with the Act.
- 2.2. It also supports The Company's aim in demonstrating commitment to the Act.

3. Scope

- 3.1 All personal data processed by The Company regardless of format.
- 3.2 Any individual processing personal data held by The Company.

4. Definitions

- 4.1. The following definitions shall apply as defined by the Act:
- 4.2. **Data** means information which:
 - 4.2.1. Is being processed by means of equipment operating automatically in response to instructions given for that purpose,
 - 4.2.2. Is recorded with the intention that it should be processed by means of such equipment,
 - 4.2.3. Is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system, i.e. a highly structured readily accessible paper filing system.

Personal data

4.3. This means information which relates to a living individual who can be identified from the data, or from the data and other information which is in the possession of, or is likely to come into the possession of, the data controller and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

Sensitive personal data

This refers to personal data consisting of information as to:

- 4.4.1. The racial or ethnic origin of the data subject,
- 4.4.2. Political opinions,
- 4.4.3. Religious beliefs or other beliefs of a similar nature,
- 4.4.4. Whether he/she is a member of a trade union (within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992),
- 4.4.5. Physical or mental condition
- 4.4.6. Sexual life,
- 4.4.7. Alleged admission by him/her of any offence, or
- 4.4.8. Any proceedings for any offence committed or alleged to have been committed by him/her, the disposal of such proceedings or the sentence of any court in such proceedings.
- 4.5. Processing in relation to information or data, means obtaining, recording or holding the information or data, or carrying out any operation or set of operations on the information or data.
- 4.6. Data subject means an individual who is the subject of personal data.
- 4.7. Data controller means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data is, or is to be, processed. A data controller may also act jointly with another organisation to process personal data.
- 4.8. Data processor, in relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

5. The Eight Data Protection Principles

The Company shall adhere to the eight principles of the Act, which are:

Principle 1: Personal data shall be processed fairly and lawfully.

Principle 2: Personal data shall be obtained for a specified and lawful purpose and not processed in a manner incompatible with that purpose.

Principle 3: Personal data shall be adequate, relevant and not excessive for the purpose.

Principle 4: Personal data shall be accurate and, where necessary kept up to date.

Principle 5: Personal data shall not be kept longer than necessary.

Principle 6: Personal data shall be processed in accordance with the rights of the data subject.

Principle 7: Appropriate technical and organisational measures shall be taken against unauthorised/unlawful processing of personal data and accidental loss, destruction or damage of personal data.

Principle 8: Personal data shall not be transferred outside of the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

6. Company Responsibilities

The Company shall ensure that:

6.1.1. It is a registered Data Controller.

6.1.2. It has specialist staff with specific responsibility for ensuring compliance with the Act.

6.1.3. Individuals processing personal data understand that they are responsible for complying with the data protection principles.

6.1.4. Individuals processing personal data are appropriately trained to do so.

6.1.5. Individuals are provided with appropriate data protection support and guidance.

8. Privacy Notices

The Company shall ensure that a privacy notice is published on The Company website.

8.2. It shall explain in general terms the purposes for which The Company will process the data collected.

8.3. It shall explain where we keep information and why we hold it.

8.4. It shall explain whom we share personal data with.

8.5. It shall provide contact details of relevant staff to allow requests for further information.

8.6. In certain circumstances, it shall be necessary for service areas to provide additional information, to that described, within their own privacy notice, for example when and where you might share personal data with others.

8.7. A copy of the privacy notice shall be provided on request and free of charge.

9. Individual Rights

9.1. The Company shall ensure individuals have the right to access their personal data held by The Company (subject to exemptions).

9.2. The Company shall ensure that personal data is accurate (where reasonably possible) and shall investigate any complaint that relates to data accuracy.

9.3. The Company shall ensure that any objection to the processing of an individual's personal data is considered.

9.4. The Company shall not process personal data about an individual for direct marketing purposes, when the individual has specified he/she does not want direct marketing.

9.5. The Company shall consider complaints regarding how it processes personal data. Complaints shall be referred to The Company's complaints procedure in the first instance.

10. Privacy Impact Assessment (PIA)

- 10.1. The Company shall endeavour to complete a PIA at the early stages of a project to assist in identifying privacy risks. Project managers shall consult with the Information
- 10.2. The Directors team at an early stage to identify PIA requirements.

11. Data Security

- 11.1. The Company shall ensure it has an information security management system in place to support the secure processing of personal data.
- 11.2. Security policies and procedures shall be made available on The Company intranet and where appropriate The Company external website.
- 11.3. Access to personal data shall be strictly controlled.
- 11.4. The Company shall investigate all breaches of security which involve personal data.

12. Training & Awareness

- 12.1. The Company shall provide mandatory data protection training to all staff handling personal data.
- 12.2. Individuals shall maintain a good awareness of data protection.
- 12.3. Additional training shall be provided where appropriate.

13. Information Sharing

- 13.1. The Company shall ensure that information is shared only when it is within the provisions of the Act.
- 13.2. The Company shall ensure that when information is shared it is justified.
- 13.3. The Company shall ensure that adequate security is in place to protect the data when it is shared with another organisation.
- 13.4. The Company shall ensure the secure transfer of personal data between itself and other organisations.
- 13.5. The Company shall ensure that information sharing protocols exist between The Company and partnership agencies.

14. Contracts

- 14.1. Contracts shall include measures to ensure personal data is handled in accordance with the Act.
- 14.2. Personal data shall only be supplied for the agreed purposes as set out in The Company contract and shall not be used or disclosed for any other reason.
- 14.3. The Company shall ensure that before personal data is shared with a third party as part of a contract, appropriate security controls are in place.

This Policy will be reviewed annually by The Company Directors

Date of last review: 1st August 2018.

(Registered Company Number: 11948770)

Environmental Policy

1Impact Ltd is committed to placing sustainability at the heart of its mission and our Environmental Protection & Sustainability is a process of ensuring the wise use of all resources within a framework in which, environmental, social and economic factors are integrated.

- Taking positive actions promoting continual environmental improvement
- Setting and achieving clearly defined sustainable development objectives and targets
- Monitoring the progress towards achieving targets set.
- Making sustainability integral to the delivery of teaching and operational objectives.
- Make sustainability a corporate priority

To make this work effectively we will take the following steps:

- We will encourage business partners, learners and staff to incorporate informed sustainability perspectives within their work as well as develop the capacity to promote understanding of the principle of sustainability
- Develop and deliver appropriate teaching in order to expose all learners to concepts of social, ecological and ethical environmental sustainability
- Contribute to stable community building and build partnerships and create local information and learning networks for sharing experiences and knowledge of sustainability issues with all stakeholders
- Operate in ways that maximise social and economic benefit while minimising any adverse impacts to the local community
- Invest in staff development, value stakeholder involvement and promote social inclusion and equity
- Maintain and develop the Business in a sustainable manner Monitor and report on progress towards sustainability
- Promote continual improvement in maintenance practices and establish sustainability guidelines for internal and external design teams and contractors working on new build and refurbishment projects
- Develop procurement procedures with all elements of the supply chain to ensure social, ethical and environmental criteria are integrated into programmes aimed at achieving best value.
- Maximise the efficient use of energy and materials, continually improve pollution prevention measures and increase use of renewable resources and minimise waste generation in teaching activity and encourage repair, reuse and recycling ahead of the responsible disposal or surplus materials
- Promote practical measures to reduce the impact of travel to and between the our sites and conduct reviews of the Environmental Policy and assess the impact on environmental and economic issues.

This Policy will be reviewed annually by The Company Directors

Date of last review: 1st August 2018.

Equality & Diversity Policy

Registered Office
8 Windermere Road
Kettering, Northants

(Registered Company Number: 11948770)

The aim of this policy is to ensure that everyone is treated fairly and with respect and to encourage equal opportunities for all.

1mpact Ltd is responsible for setting standards and values to apply throughout the business activities it engages in, at every level. Our aim is to ensure these activities provide opportunities for everyone.

The Company its Directors and Staff will not discriminate or in any way treat anyone less favourably, on grounds of gender, sexual orientation, marital status, race, nationality, ethnic origin, colour, religion or belief, ability or disability. The Company is committed to confront and to eliminate discrimination, on the grounds mentioned above, if and whenever arises.

The Company is also committed to promoting equality by treating people fairly and with respect, by recognising that differences may exist, by taking steps to address them and by providing access and opportunities.

The Company will not tolerate harassment, bullying, abuse or victimisation of an individual, which for the purposes of this policy and the actions and sanctions applicable is regarded as discrimination. This includes sexual or racially based harassment or other discriminatory behaviour, whether physical or verbal. The Company will work to ensure that such behaviour is met with appropriate action in whatever context it occurs.

The Company is committed to the development of a programme of ongoing training and awareness, running events and activities in order to promote the eradication of discrimination within the business and within any partner organisations it works with.

The Company is committed to a policy of equal treatment of all people and requires all staff members to abide and adhere to these policies and the requirements of the relevant equalities legislation - Race Relations Act 1976, Sex Discrimination Act 1975 and Disability Discrimination Act 1995 as well as any amendments to these acts.

The Directors commit to the immediate investigation of any claims, when it is brought to their attention, of discrimination on the above grounds and where such is found to have been upheld a requirement that the practice stops and sanctions shall be imposed as appropriate.

This Policy will be reviewed annually by The Company Directors

Date of last review: 1st August 2018.

Health & Safety Policy

Registered Office
8 Windermere Road
Kettering, Northants

(Registered Company Number: 11948770)

1mpact Ltd recognises and accepts its responsibility to provide a safe and healthy environment for all its staff and visitors, including contractors, and learners and wishes to ensure that no one will be, so far as is reasonably practicable, be put at risk.

The Company recognises that the Health and Safety at Work Act places a general duty on every employee to exercise personal responsibility and care for the health and safety of themselves and others, and to co-operate fully with the employer in meeting its responsibilities under the Act.

Aim

The Company aims to ensure that all staff, learners and visitors have a safe and healthy place to visit, work and learn. The Company will ensure that all are made aware of the appropriate measures that have been put in place and will undertake any training that is required.

Relevant Legislation

- Health and Safety at Work 1974
- And any relevant regulations that follow from the act, in particular those referred to in the policy below.

Responsibilities

1. The Company recognises its health and safety responsibilities under the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1992 and concomitant protective legislation including the Environmental Protection Act 1990 and the Regulatory Reform (Fire Safety) Order 2005, and to that end has appointed an external Health and Safety qualified Company to keep workplace procedures relating to Health and Safety under constant review and to liaise with the Health and Safety Executive/Local Authority wherever necessary, so as to keep the Company and its Managers updated on any new legislation affecting them, EC Directives, Regulations, and British Standards in order to ensure compliance with the same.
2. In accordance with its duties under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1985 (RIDDOR), the Company has instituted a system for reporting accidents, diseases and dangerous occurrences to the Health and Safety Executive/Local Authority/Funding Bodies (as is required by contractual obligation, legislation and regulation) including injury to any learner's and this is in addition to its statutory duty to keep an accident book available for inspection by an Inspector of the Health and Safety Executive/Local Authority.
3. In furtherance of the these duties the Company proposes always to comply with its duties under Section 2 of the Health and Safety at Work Act and The Management of Health and Safety at Work Regulations 1992, Regulations 3 to 6, towards its Employees and, more particularly, so far as is reasonably practicable to:
 - a. Provide and maintain a safe place of work, a safe learning environment, safe systems of work, safe appliances for work and a safe and healthy working environment;
 - b. Provide such information and instructions as may be necessary to ensure the health and safety at work of all its service recipients and also compliance with the Health and Safety Information for Employees Regulations 1989, the Personal Protective Equipment Regulations 1992, the Workplace (Health, Safety and Welfare) Regulations 1992 and the Regulatory Reform (Fire Safety) Order 2005 and to promote awareness and understanding of health and safety throughout the workforce;
 - c. Ensure safety and absence of health risks in connection with use, handling, storage and transport of articles and substances;
 - d. Undertake annual review of site risk assessments;
 - e. Take appropriate preventative/protective measures including drug and alcohol testing of those workers whose impairment would adversely affect the Health and Safety of Employees or others;
 - f. Appoint competent personnel to secure compliance with statutory duties.
 - g. In further recognition of its statutory and common law duties the Company has taken out insurance, with an approved insurer, against liability for death, injury and/or disease suffered by any of its Employees and arising out of and in the course of employment, provided only that the same was caused by the negligence and/or breach of statutory duty on the part of the

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Company; such certificate of insurance being prominently displayed so as to be available for inspection at all reasonable times by Employees and a Health and Safety Inspector.

4. All Employees agree as a term of their contract of employment to comply with their individual duties under Section 7 of the Health and Safety at Work Act Regulation 12 of the Management of Health and Safety at Work Regulations 1992 and generally to co-operate with the Company, so as to enable the Company to carry out his health and safety duties towards them. Failure to comply with health and safety duties and training received, regulations, work rules and procedures regarding health and safety, on the part of any service provider, can lead to dismissal from employment; in the case of serious breaches, or repeated breaches, dismissal may be instant without prior warning.
5. Prime responsibility for health and safety lies with the Directors of the Company and the Company regards itself as bound by any acts and/or omissions of the Centre Manager, or any or all of the Senior Managers, giving rise to liability provided only that such acts and/or omissions arise out of and in the course of the Company's business, and prosecution of any or all of the senior Managers shall not prevent a further prosecution against the Company.
6. In recognition of its duties under Section 6 of the Health and Safety at Work Act and the Consumer Protection Act 1987 towards its customers, the Company proposes (expressed as a normal term or condition of its trade in its terms or conditions of trade) always to supply machinery and parts which so far as reasonably practicable, are safe for normal operational use and free from foreseeable health and hygiene risks to customers. To that end the Company will provide customers, on an on-going basis, with such official and trade information, including relevant EC standards and British Standards relating to new and existing health and safety risks that may or indeed have come to its attention in the normal course of trade, and which can reasonably be obtained from the Health and Safety Executive/Local Authority, British Standards Institution and the EC.
7. In recognition of its duties towards the general public and all lawful visitors to the Company's premises the Company regards the extent of its duties as compatible with Sections 2 and 5 of the Health and Safety at Work Act and the Occupiers Liability Acts 1957 and 1984, in particular where visitors are under a statutory duty to wear protective clothing or otherwise take reasonable precautions for their own health and safety, failure to do so will be regarded as breach of policy entitling the Company to take such measures as it considers appropriate including asking the visitor to leave the premises.

This policy has been prepared in furtherance of Section 2(3) of the Health and Safety at Work Act 1974 and binds all Employees in the interests of Employees and customers. We request that our customers and visitors respect this policy, a copy of which can be obtained upon demand.

This Policy will be reviewed annually by The Company Directors

Date of last review: 1st August 2018.

Learning & Development Policy

The Policy reflects the 1mpact Ltd Workforce Plan framework, to ensure we maximise the Company's capacity, performance and resilience to deliver The Company objectives through people, which means:

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- Having the right skills, in the right place, at the right time, to the required capacity to deliver The Company's priorities at the agreed standards
- Developing and supporting all of our employees to do their job well to deliver The Company's priorities for the benefit of our customers and communities
- Working as one Company and, through our partners, to deliver effective and efficient services

The policy sets out the minimum standards which managers and employees are expected to implement, and clarifies The Company wide learning & development initiatives managers and employees have access to, such as the Employee Induction Programme and The Company Core Values and Behaviours

Given the requirement for technical knowledge in each of the service areas, there will be a need to devise, design, revise and implement a tailored learning and development programme based on the unique needs of the individual appropriate to professional competencies or standards set by a recognised professional body.

Learning & development programmes must ensure that The Company Corporate Vision, Purpose, Values and Culture are embedded and reinforced to ensure that employees at all levels can see and understand how their learning and development compliments The Company's ambition.

The Directors must ensure that learning and development opportunities are fair and equitable for all staff and that it is applied in line with The Company's Equality and Diversity Policy. Recognising the economic climate The Company has to operate in and its responsibility to The Company's Customers there is an expectation that, as well as quality, The Company cost of any learning and development opportunity is carefully considered as part of a wider cost-benefits analysis.

MINIMUM STANDARDS

- All new employees and those new to a role will have access to an Employee Induction as well as a local Induction process that will allow them to feel welcomed.
- All employees will be encouraged to take accountability for their learning and as a minimum will achieve the outcomes as set out in The Company Code of Conduct
- All learning & development contributes to The Company Vision, Purpose, Values and Culture, and any service-specific and partnership working objectives.
- All employees have equal opportunities to develop their career, supported by a coaching-style of leadership.
- All employees can confirm that they are well supported after accessing a learning and development opportunity, and have clear objectives for putting the new skills and knowledge into practice

| | |
|--|---|
| Must Do (incorporating Statutory and Mandatory) This is The Company CPD learning and development that we all need to complete to ensure the safe and efficient running of our organisation. | |
| An Introduction to Safeguarding | Must be completed every two years |
| Data Protection & Information Security | Must be completed each financial year |
| General Fire Awareness/Safety | Must be completed each financial year |
| Display Screen Equipment (DSE) E-learning | Will be available for renewal each year |
| Prevent | Must be completed every two years |
| Basic Domestic Abuse Awareness | Must be completed every five years |

This Policy will be reviewed annually by The Company Directors

Date of last review: 1st August 2018.

Modern Day Slavery & People Trafficking Policy

1mpact Ltd has a zero tolerance approach to modern slavery and is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or in any of its partners .

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Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

The Company is also committed to ensuring there is transparency in all its business and in its approach to tackling modern slavery throughout its supply chains, consistent with its disclosure obligations under the Modern Slavery Act 2015.

The same high standards are expected from all of The Company contractors, suppliers and other business partners. Wherever practicable, The Company will seek to include in its contracts with business partners specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that its suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for The Company or on its behalf in any capacity

The Director have primary and day to day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. The Directors are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in partners.

All staff must ensure that they read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of the business or supply chains is the responsibility of all those working for or under Company's control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Everyone is encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of The Company business or supply chains at any level of supply at the earliest possible stage and report it in Openness and we will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

Our zero tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

1mpact Ltd may terminate its relationship without recourse with other individuals, Partners and organisations working on its behalf or if partnership if they breach this policy.

This Policy will be reviewed annually by The Company Directors

Date of last review: 1st August 2018.

Safeguarding & Welfare Policy

1mpact Ltd acknowledges the responsibility to safeguard the welfare of every child, young person or Adult who becomes engaged in our business activities and is committed to working to provide a safe environment for all by

- Protecting people from maltreatment

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- Preventing impairment of learners health or development
- Ensuring that learners are growing up in circumstances consistent with the provision of safe and effective care
- Undertaking that role so as to enable those people to have optimum life chances and enter adulthood successfully; and
- Promoting a safe environment free from violence

Aim of this policy

The aim of this policy is to outline the practice and procedures for Directors, Business partners, staff members and learners to contribute to the prevention of abuse of vulnerable adults through raising awareness and providing a clear framework for action when abuse is suspected.

It is aimed at protecting the vulnerable adult, staff members and other individuals, recognizing the risks involved within a learning environment.

The policy covers individuals involved in all areas of work / training, with specific guidance for projects regularly in contact with vulnerable adults.

Legislation

This policy affirms the organisations commitment to the current and any subsequent legislation governing safeguarding vulnerable adults in particular: -

Human Rights Act 1998
Safeguarding Vulnerable Groups Act 2006
Special Educational Needs & Disability Discrimination Act 2001
Sexual Offences Act 2003
Care Standards Act 2000
Health and Social Care Act 2008
Mental Capacity Act 2005
Domestic Violence Crime and Victims act 2004
Apprenticeships, Skills, Children and Learning Act 2009
Equality Act 2010

Responsibility

It is the responsibility of the Directors and the Designated Person/s to ensure that the Safeguarding Policy is adhered to within the organisation.

Responsibilities of Safeguarding Of Vulnerable Adults (“SOVA”)

- To ensure everyone is are aware of the adult protection policy and are adequately trained
- To notify the appropriate agencies if abuse is identified or suspected
- To support and where possible secure the safety of individuals and ensure that all referrals to services have full information in relation to identified risk and vulnerability
- To CRB check volunteers and employees that have access to, or work with Vulnerable Adults
- Liaise with other agencies as appropriate.
- Commit to develop productive and supportive relationships with parents, guardians or carers whenever it is in a learner’s best interest to do so.

Rights & Responsibilities of Employees And Learners

It is the responsibility of all staff, contractors, service providers, and enrolled learners to adhere to the Safeguarding Policy, specific responsibilities include: -

Responsibilities (under SOVA) employees and volunteers

- To be familiar with the adult protection policy and procedures
- To take appropriate action in line with the policies of SOVA

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- To declare any existing or subsequent convictions. Failure to do so will be regarded as gross misconduct, possibly resulting in dismissal

Support for those who report abuse

All those making a complaint or allegation or expressing concern, whether they be staff, learners, service users, carers or members of the general public should be reassured that: -

- They will be taken seriously
- Their comments will usually be treated confidentially, but their concerns may be shared if they or others are at significant risk
- If service users, they will be given protection from the risk of reprisals or intimidation
- If Staff they will be given support and afforded protection if necessary in line with the Public Interest Disclosure Act 1998.

The Vulnerable Adult has the right:

- To be made aware of this policy
- To have alleged incidents recognized and taken seriously
- To receive fair and respectful treatment throughout
- To be involved in any process as appropriate
- To receive information about the outcome

Definition of vulnerable

The Police Act 1997 (Enhanced Criminal Record Certificates) (Protection of Vulnerable Adults) Regulations 2000

In these Regulations, '**vulnerable adult**' means a person aged 18 or over who is receiving services of a type listed below and in consequence of a condition of a type listed has a disability of a type listed below.

The services are:

- a. Accommodation and nursing or personal care in a care home
- b. Personal care or nursing care or support to live independently in his/her own home
- c. Any services provided by an independent hospital, independent clinic, independent medical agency or NHS body;
- d. Social care services
- e. Any services provided in an establishment catering for a person with learning difficulties

The conditions are:

- a. A learning or physical disability;
- b. A physical or mental illness, chronic or otherwise, including an addiction to alcohol or drugs
- c. A reduction in physical or mental capacity

The disabilities are:

- a. A dependency upon others in the performance of, or a requirement for assistance in the performance of, basic physical functions;
- b. Severe impairment in the ability to communicate with others;
- c. Impairment in a person's ability to protect him/herself from assault, abuse or neglect

[Law Commission, 'Making Decisions' Lord Chancellors Dept 1999]

A '**Vulnerable Adult**' is defined as someone over 16 who is or may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or exploitation'.

Definition of Abuse

"**Abuse**" is the harming of another individual usually by someone who is in a position of power, trust or authority over that individual. The harm may be physical, psychological or emotional or it may be directed at exploiting the vulnerability of the victim in more subtle ways (*for example, through denying access to people who can come to the aid of the victim, or through misuse or misappropriation of his or her financial resources*). The threat or

use of punishment is also a form of abuse. In many cases, it is a criminal offence”
[Centre for Policy on Ageing (1996)]

[Centre for

Types of Abuse

Physical abuse

- Bodily assaults resulting in injuries e.g. hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions.
- Bodily impairment e.g. malnutrition, dehydration, failure to thrive
- Medical/healthcare maltreatment

Sexual abuse

- Rape, incest, acts of indecency, sexual assault
- Sexual harassment or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressured into consenting.
- Sexual abuse might also include exposure to pornographic materials, being made to witness sexual acts and encompasses sexual harassment and non-contact abuse.

Psychological/emotional abuse includes:

- Including threats of harm, controlling, intimidation, coercion, harassment, verbal abuse, enforced isolation or withdrawal from services or supportive networks.
- Humiliation, Bullying, shouting, swearing

Neglect

- Including ignoring medical or physical care needs failure to provide access to appropriate health, social care or educational services the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Financial or material

- Including theft, fraud, exploitation, and pressure in connection with wills property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

Discriminatory

- Including racist, sexist, or based on a person's disability, and other forms of harassment, slurs or similar treatment.

Multiple forms of abuse may occur in an on-going relationship or abusive service setting to one person, or to more than one person at a time, making it important to look beyond single incidents or breaches in standards, to underlying dynamics and patterns of harm. Any or all of these types of abuse may be perpetrated as the result of deliberate intent and targeting of vulnerable people, negligence or ignorance.

No abuse is acceptable and some abuse is a criminal offence and must be reported to the Police as soon as possible.

Good Practice to be undertaken

Recruitment of Staff and Volunteers

Follow SOVA recruitment procedures and policies, including: -

- Risk assessment of role to assess need for CRB Disclosures
- Check references thoroughly including appropriate Disclosure
- All staff and volunteers have a duty to declare any existing or subsequent convictions. Failure to do so will be regarded as gross misconduct, possibly resulting in dismissal

Training

All management and employees will: -

- Ensure familiarity with all SOVA policies and procedures during induction

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- Complete LSIS Safeguarding online course
- Undertake any further training, dependent on nature of role
- Complete and comply with risk assessment & management
- Make sure they are aware of what is considered abuse and recognising the signs of abuse, taking advice from the designated person if unsure
- Keep appropriate records
- Use listening skills at all times

Management and Supervision

It is the line manager's responsibility to clarify with the staff members or learners their roles and responsibilities regarding their relationships with vulnerable adults with whom they may be in contact. Regular supervision for staff and learners will monitor the work and offer the opportunity to raise any issues.

Ensure that all staff and volunteers recognise their duty and feel able to raise concerns about poor or unsafe practice concerning learners and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle blowing policies. In all cases the Health and Safety and Welfare of the learner is paramount.

Record Keeping

There should be a written record of any concerns. This confidential information will be kept in a locked cabinet/drawer by the appropriate person, and will be kept for only as long as is deemed necessary, in line with Data Protection principles. *(Please refer to Confidentiality & Data Protection Policy)*

- All incidents should be discussed in supervision with line manager
- Records kept about vulnerable adults should only include:
 - Contacts made
 - Referrals made, including date, time, reason and referral agency

Planning

Wherever possible paid staff and learners should avoid lone working or studying with a vulnerable adult. But if unavoidable, one to one contact should take place in an environment where other staff or learners are present or within sight.

Monitoring and Evaluation

The Directors and management group will on an annual basis monitor and evaluate all issues relating to Safeguarding, which will be incorporated in the SAR.

Access to an independent person

Any vulnerable adult who comes into contact with staff or individuals regularly should be given information on their right to talk with an independent person, and their name and contact arrangements.

This could form part of the normal registration process.

The designated safeguarding person and Welfare Officer is James Bambridge

This Policy will be reviewed annually by The Company Directors

Date of last review: 1st August 2018.

Social Media Policy

Impact has a corporate website and various Social Media Channels we use. On these Channels you will find important information about The Company.

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Some of the social media platforms we use have photo galleries where we display photos in various events we organise and take part in.

Social media refers to websites and applications that enable users to create and share content or to participate in social networking. It is a key part of the PR toolkit, specifically for:

- **Communication** – directly communicate important and timely messages, news and information, promote events and improve awareness of services
- **Engagement** – seek opinions, share conversations and engage with residents to improve residents' knowledge and correct misconceptions
- **Collaboration** – find more efficient ways of working together and sharing information which can change or enhance the perception of The Company's services
- **Advertising** – target specific audiences outside existing networks with relevant information and calls-to-action in a more cost-effective way than traditional media

Anyone we wish to use an existing Company social media profiles or pages must be approved. This includes partnerships arrangements The Company may have in place from time to time. The Company will ensure that ownership of all accounts is centralised and that only appropriate users have access. This helps to reduce the risks for The Company, its partners and employees and ensures that The Company has a record of all existing accounts and activity.

For a new profile or page to be approved, you must have evidence of a user need for it and the Resource to maintain it. Failure to maintain social media channels to expected standards may result in the profile or page being deleted. This may be due to:

- Infrequent posting
- Ignoring messages and comments
- Lack of engagement
- Inconsistent branding
- Lack of accuracy
- No evidence of added value to the service

Anything written on a Company's social media channel reflects on the organisation but, given the relaxed style of social media, it's important not to appear overly formal.

DO

- Engage with conversations, share news and ask questions
- Post regular/daily content and respond to questions
- Take difficult conversations out of the public domain and on to a private channel
- Consider how to deal with messages received out of hours

DO NOT

- Ignore genuine questions or interactions
- Talk about anything political, policy proposals or of wider Company implications
- Reveal confidential or sensitive information about the authority or your work
- Delete posts/comments unless absolutely necessary (see Moderation)

Anyone found to be viewing or publishing inappropriate content, such as illegal, pornographic, racist or sexist material, will be investigated formally under The Company's disciplinary procedure and may be viewed as an act of gross misconduct.

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The social media platforms we use have photo galleries where we display photos of the team(s), coaches and volunteers, in various events we organise and take part in. We would therefore like to seek your permission to use photos of your child, when he/she gets involved in such events

MODERATION

We are under no obligation to moderate posts or comments by the public. However, there are measures which must be taken to ensure our duty of care when using profiles which are aimed at young and vulnerable people.

The Company and its staff or partners must not be seen to be endorsing comments which are:

- Defamatory, false or misleading
- Insulting, threatening or abusive
- Obscene or of a sexual nature#
- Offensive, racist, sexist, homophobic or discriminatory against any religions or other groups
- Promoting illegal activity
- Intended to deceive

If any comment, by the service or a user, is suspected as falling into one of these categories then the Directors must be contacted immediately.

This Policy will be reviewed annually by The Company Directors

Date of last review: 1st August 2018.

Whistleblowing Policy

1mpact Ltd has a whistleblowing policy that protects staff members who report colleagues they believe are doing something wrong or illegal, or who are neglecting their duties. The whistleblowing policy has a key role to

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Kettering, Northants

(Registered Company Number: 11948770)

play in safeguarding people. The policy also extends to ant business partners who are engaged with us in supporting learners or business transactions.

Whistleblowing is when someone reports suspected wrongdoing at work. Wrong-doing covered by this 'public interest disclosure' includes:

- someone's health and safety is in danger;
- damage to the environment;
- a criminal offence;
- not obeying the law;
- covering up wrongdoing;
- misusing public funds;
- actions that negatively affect the welfare of children

Where anyone has a concern they should aim to report it internally first before using an external 'prescribed person or body'. Making a report to an external person may only be undertaken where the staff member thinks the Company will cover it up, would treat them unfairly if they complained or have raised the matter before, but the concern hasn't been dealt with.

Concerns should follow these steps:

- Line Manger
- Specified person (or Director) in school
- Local Authority
- Union or Professional Association
- Prescribed Person or Body (eg. Ofsted, Education Funding Agency, Children's Commissioner or NSPCC)
- alternatively contact the whistleblowing charity, 'Public Concern At Work' www.pcaaw.org.uk

Principles of Whistleblowing

1) Working Together to Safeguard Children is expecting these principles to be particularly evident in the safeguarding systems.

2) Prompt dealing with concerns particularly the need for prompt investigation.

3) Training and Communication so that everyone understands what the whistleblowing policy is there for and what concerns are covered.

4) The idea of ensuring that no-one feels unable to raise concerns, but recognises that some staff may feel they will not be listened to

This Policy will be reviewed annually by The Company Directors

Date of last review: 1st August 2018.