



# PRIMARY CARE TRAINING CENTRE

## POLICIES AND PROCEDURES

This is a declaration of our intent to provide and maintain, so far as is reasonably practicable, a safe and healthy training environment and to enlist the help of students towards achieving these goals. This policy sets out our commitment to manage risks and provide good standards of health and safety and also to meet our legal duties. Health and safety is an integral part of how we do business as a responsible trainer and we have put in place the necessary organisation and arrangements to achieve this. This policy has been initiated after carrying out a full appraisal of our health, safety and welfare requirements and will be reviewed periodically (at least annually).

A Health and Safety Policy Statement is displayed at our premises, located in the Reception area.

# Health, Safety, Welfare and Hygiene Policy

## **A) Safety**

1. Our full Health & Safety Policy is kept on site and can be checked at any time by asking one of our Office Managers.
2. You must not take any action that could threaten the safety of yourself, other students, employees of the Primary Care Training Centre or members of the public.
3. You should report all accidents and injuries at the Training Centre, no matter how minor, in the accident book which is held by the facilities manager.
4. You must ensure that you are aware of our fire and evacuation procedures and the action you should take in the event of such an emergency. Your tutor will tell you the procedures at the start of your study or workshop day, and these are displayed at various locations around the premises.
5. Students must remain in the reception areas until met by an authorised member of staff or tutor.

## **B) Refreshment Facilities**

1. We provide refreshment facilities for all students. Please help us keep areas neat and tidy by returning empty cups to our housekeeper.
2. Drinks can be hot. Please take care whilst carrying them.
3. Please do not take full cups of drink up the stairs as spillages may constitute a hazard.

## **C) Alcohol and Drugs Policy**

1. We have a duty to ensure so far as is reasonably practicable the health and safety and welfare at work of all our employees and students, and similarly you have a responsibility to yourself and your colleagues. The use of alcohol and drugs may impair the safe and efficient running of the Training Centre and/or the health and safety of our employees and students.
2. If your performance or attendance is affected as a result of alcohol or drugs, or we believe that you have been involved in any drug related action/offence, you may be subject to removal from the course you are attending.

## **D) Hygiene**

1. Any exposed cut or burn must be covered with a first aid dressing.
2. If you are suffering from an infectious or contagious disease or illness such as rubella or hepatitis you must not attend the Training Centre without clearance from your own doctor.
3. Contact with any person suffering from an infectious or contagious disease must be reported before attending the Training Centre.

## **E) No Smoking Policy**

1. Smoking is strictly prohibited on our premises and grounds. This includes the use of e-cigarettes.

## **F) Security**

1. Nothing must be taken from the premises without permission.
2. We reserve the right to search students' bags, packages and vehicles.
3. Students should wear their badges at all times, and must be prepared to identify who they are if requested to do so by any member of staff.
4. Suspicious looking packages or items must be reported to Training Centre staff immediately.

**G) Parking**

1. Students are only allowed to park their vehicles in approved parking areas.
2. Vehicles must not obstruct fire exits, fire escape routes, pedestrian walkways, private or public access, or any other potential vehicle movement areas.

# Personal Harassment Policy and Procedure

## A) Introduction

1. Harassment or victimisation on the grounds of race, colour, nationality, ethnic or national origin, sex, marital status, gender reassignment, sexual orientation, religion, belief, disability or age is unacceptable.
2. Personal harassment takes many forms ranging from tasteless jokes and abusive remarks to pestering for sexual favours, threatening behaviour and actual physical abuse. Whatever form it takes, personal harassment is always taken seriously and is totally unacceptable.
3. We recognise that personal harassment can exist in the workplace, as well as outside, and that this can seriously affect students' lives by interfering with their performance or by creating a stressful, intimidating and unpleasant study environment.

## B) Policy

1. We deplore all forms of personal harassment and seek to ensure that the study environment is sympathetic to all our students.
2. We have published these procedures to inform students of the type of behaviour that is unacceptable and provide students who are the victims of personal harassment with a means of redress.
3. We recognise that we have a duty to implement this policy and all students are expected to comply with it.

## C) Examples of Personal Harassment

Personal harassment takes many forms and students may not always realise that their behaviour constitutes harassment. Personal harassment is unwanted behaviour by one student towards another and examples of harassment include:

- a) insensitive jokes and pranks;
- b) lewd or abusive comments about appearance;
- c) deliberate exclusion from conversations;
- d) displaying abusive or offensive writing or material;
- e) unwelcome touching; and
- f) abusive, threatening or insulting words or behaviour.

These examples are not exhaustive and disciplinary action at the appropriate level will be taken against students committing any form of personal harassment.

## D) Complaining about Personal Harassment

### 1. Informal Complaint

We recognise that complaints of personal harassment, and particularly of sexual harassment, can sometimes be of a sensitive or intimate nature. In these circumstances you are encouraged to raise the issue with your tutor or a member of the Training Centre staff as a confidential helper.

If you are the victim of minor harassment you should make it clear to the harasser on an informal basis that their behaviour is unwelcome and ask the harasser to stop. If you feel unable to do this verbally then you should hand a written request to the harasser, and your confidential helper can assist you in this.

## 2. Formal Complaint

Where the informal approach fails or if the harassment is more serious, you should bring the matter to the attention of the Training Centre as a formal written complaint and again your confidential helper can assist you in this. If possible, you should keep notes of the harassment so that the written complaint can include:

- a) the name of the alleged harasser;
- b) the nature of the alleged harassment;
- c) the date and times when the alleged harassment occurred;
- d) the names of any witnesses; and
- e) any action already taken by you to stop the alleged harassment.

On receipt of a formal complaint we will take action to separate you from the alleged harasser to enable an uninterrupted investigation to take place. This may involve a temporary transfer of the alleged harasser to another work area until the matter has been resolved.

The person dealing with the complaint will invite you to attend a meeting, at a reasonable time and location, to discuss the matter and carry out a thorough investigation. You have the right to be accompanied at such a meeting by your confidential helper or another colleague of your choice and you must take all reasonable steps to attend. Those involved in the investigation will be expected to act in confidence and any breach of confidence will be a disciplinary matter.

On conclusion of the investigation, a draft report of the findings and the investigator's proposed decision will be sent, in writing, to you and the alleged harasser.

If you or the alleged harasser are dissatisfied with the draft report or the proposed decision this should be raised with the investigator within five working days of receiving the draft. Any points of concern will be considered by the investigator before a final report is sent, in writing, to you and the alleged harasser.

### **E) General Notes**

1. If the report concludes that the allegation is well founded, the harasser will be liable to disciplinary action which may include dismissal from that particular or any other courses they may be enrolled on with the training centre. A student who receives a formal warning or is dismissed from a course for harassment may appeal by writing to the Training Centre.
2. If you bring a complaint of harassment you will not be victimised for having brought the complaint. However, if the report concludes that the complaint is both untrue and has been brought with malicious intent, disciplinary action will be taken against you.

# Equal Opportunities Policy

## **A) Statement of Policy**

1. We recognise that discrimination is unacceptable and although equality of opportunity has been a long standing feature of the Training Centre, we have made the decision to adopt a formal equal opportunities policy. Breaches of the policy will lead to disciplinary proceedings and, if appropriate, disciplinary action.
2. The aim of the policy is to ensure that no student is discriminated against either directly or indirectly on the grounds of race, colour, nationality, ethnic or national origin, religion, belief, sex, marital status, gender reassignment, sexual orientation, religion, belief, disability or age.
3. We will maintain a neutral working environment in which no student feels under threat or intimidated.
4. We will not discriminate in accepting students onto courses. All places will be awarded on merit.
5. All students who apply to us will be treated fairly.

## **B) Monitoring**

1. We will maintain and review student records in order to monitor the progress of this policy.
2. Monitoring may involve:
  - a. The collection and classification of information regarding the race in terms of ethnic/national origin and sex of all students;
  - b. The examination by ethnic/national origin and sex of the distribution of students and the success rate of students;
3. The results of any monitoring procedure will be reviewed at regular intervals to assess the effectiveness of the implementation of this policy. Consideration will be given, if necessary, to adjusting this policy to afford greater equality of opportunities to all students.

# Modern slavery and human trafficking statement

## **A) Introduction from the Directors**

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.

We are committed to improving our practices to combat slavery and human trafficking.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement.

## **B) Organisational structure**

We are a provider of education and training in the Health sector.

The Primary Care Training Centre is a limited company registered in England and Wales. It employs 12 staff and operates in the United Kingdom and Ireland.

We have a global annual turnover of £1 million.

## **C) Our supply chains**

Our supply chains include NHS staff, such as doctors and nurses, who provide training on our behalf, Teesside University which accredits our courses and general suppliers used in the running of a small office such as facilities management, printing and stationery.

## **D) Our policies on slavery and human trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

In light of the obligation to report on measures to ensure that all parts of our business and supply chain are slavery free we have reviewed our workplace policies and procedures to assess their effectiveness in identifying and tackling modern slavery issues.

Our workplace policies and procedures demonstrate our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

## **E) Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

## **F) Supplier adherence to our values**

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we ensure that we work with suppliers who treat their obligations towards modern slavery with the same importance that we do. We have a dedicated compliance team, which consists of our Clinical and Finance Directors.

The compliance team is led by Mark Sheldon, Finance Director.

## **G) Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our staff. Our employees are encouraged to identify and report any potential breaches of our anti-slavery policy and we have in place protection for whistle blowers. We also require our business partners to provide training to their staff and suppliers and providers.

# Anti-bribery and corruption

## A) Introduction

Bribery and corruption remain a major issue in world trade, despite the many dedicated efforts to prevent them. Our legal obligations are primarily governed by the Bribery Act 2010. That Act affects us, as a UK company, if bribery occurs anywhere in our business.

Involvement in bribery and corruption exposes PCTC and relevant individuals to a criminal offence. It will also damage our reputation and the confidence of our students, suppliers and business partners.

PCTC's position is simple: PCTC conducts its business to the highest legal and ethical standards. PCTC will not be party to corruption or bribery in any form. Such acts would damage PCTC's reputation and expose PCTC, and its employees and representatives, to the risk of fines and imprisonment.

We run our business with integrity and in an honest and ethical manner. All of us must work together to ensure that our business remains untainted by bribery or corruption. This policy is a crucial element of that effort and is the personal responsibility of our Finance Director's commitment to make sure it is followed. However, the policy needs your full support to make it work.

This policy sets out the steps all of us must take to prevent bribery and corruption in order to comply with relevant legislation and PCTC's requirements.

## B) What are bribery and corruption?

A '**bribe**' is a financial or other advantage offered, promised, requested or given to induce a person to perform a relevant function or activity improperly, or to reward them for doing so. In this context, a 'financial or other advantage' is likely to include cash or cash equivalent, gifts, hospitality and entertainment, services, loans, preferential treatment in a tendering process, discounts etc. The timing of the bribe is irrelevant and payments made after the relevant event will still be caught, as will bribes that are given or received unknowingly. It is not necessary for the individual or organisation actually to receive any benefit as a result of the bribe.

'**Bribery**' includes offering, promising, giving, accepting or seeking a bribe.

'**Corruption**' is the misuse of office or power for private gain.

All forms of bribery and corruption are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, you should raise it with your manager

This means that no person must:

- give or offer any payment, gift, hospitality or other benefit in the expectation that an advantage will be received, or to reward any business received;
- accept any offer from a third party that you know or suspect is made with the expectation that we will provide an advantage for them or anyone else; or
- give or offer any payment (sometimes known as a 'facilitation payment') to a government official in any country to facilitate or speed up a routine or necessary procedure.

No person must threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

It does not matter whether the bribery occurs in the UK or abroad. A corrupt act committed abroad may well result in a prosecution in the UK. Nor does it matter whether the act is done directly or indirectly.

### **C) Who can be involved in bribery and in what circumstances?**

Bribery and corruption may be committed by anyone working for us or on our behalf in any capacity, such as our employees, officers or directors, anyone they authorise to do things on their behalf, our representatives and other third parties who act on our behalf, our tutors, our suppliers and even our students.

The provisions of this policy therefore apply to all those listed above.

Bribery can occur in both the public and private sectors. The person receiving the bribe is usually in a position to influence the award or the progress of business, often a government or other public official.

### **D) The legal position on bribery and corruption**

Bribery and corruption are criminal offences in most countries where we do business. UK-incorporated companies, including us, are subject to the Bribery Act 2010.

### **E) Who is responsible for this policy**

The Finance Director has overall responsibility for this policy.

### **F) Gifts and hospitality**

We forbid any of our staff from soliciting any gift or hospitality in the course of their work for us.

We also forbid any of our staff from offering or receiving from any person or organisation who has had, has or may have any influence over our business any gift or hospitality which is unduly lavish or extravagant or otherwise inappropriate, or which could be seen as an inducement or reward for any preferential treatment. We regard the following to be inappropriate (the list is not exhaustive):

- a personal or corporate gift to a value in excess of £30;
- hospitality to a value in excess of £30
- any gift that includes cash or a cash equivalent (such as vouchers);
- any gift or hospitality given or received in secret; and
- any gift or hospitality given or received in your name rather than our name.

### **G) Records**

It is essential that we keep full and accurate records of all our financial dealings. Transparency is vital; false or misleading records could be very damaging to us. Under money laundering regulations our lawyers and accountants are obliged to report anything which appears to be irregular.

You must therefore declare and properly record (in writing) all hospitality and gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our prevailing policy and properly record the reason for the expenditure.

All accounts, invoices, credit notes, purchase orders and other records relating to dealing with third parties (including suppliers and customers) must be properly prepared in accordance with our prevailing practices and requirements and with accuracy and completeness. No account may be kept 'off book'.

#### **H) Monitoring**

The directors will monitor the policy regularly to make sure it is being adhered to.

#### **I) What to do if you think something is wrong**

Each of us has a responsibility to speak out if we discover anything corrupt or otherwise improper occurring in relation to the business. If you are offered a bribe, or are asked to make one, or if you discover or suspect that any bribery or corruption has occurred or may occur, you must report in accordance with the procedure set out in our Whistleblowing Policy as soon as possible. You must make your report as soon as reasonably practicable and you may be required to explain any delays.

#### **J) Compliance with this policy**

PCTC takes compliance with this policy very seriously. Failure to comply puts both individuals and PCTC at risk. Individuals may commit a criminal offence if they fail to comply with this policy. The criminal law relating to bribery and corruption carries severe penalties.

Because of the importance of this policy, failure to comply with any requirement of it may lead to disciplinary action under our procedures, and this action may result in dismissal for gross misconduct. Any non-employee who breaches this policy is liable to have their contract terminated with immediate effect. Students who breach this policy are liable to removal from any course they are enrolled on.

If you are in doubt about anything in this policy, do not hesitate to contact our Finance Director.

Mark Sheldon

Linda Goldie

Primary Care Training Centre

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