



# Ufton Court Educational Trust Ltd

## Compliance

Adopted and Delivered on behalf of Ufton Court Educational Trust Ltd by

Signature: 

Date: 23<sup>rd</sup> February 2022

Position: **Trustee with overview of Health and Safety**



Signature:

Date: 23<sup>rd</sup> February 2022

Position: **Managing Director responsible for implementation**

Signature:



Date: 23<sup>rd</sup> February 2022

Position: **Senior Leadership Team**

Signature:



Date: 23<sup>rd</sup> February 2022

Position: **Senior Leadership Team**

Company Address: Ufton Court Trust, Green Lane, Ufton Nervet, Berkshire RG7 4HD

General enquiries: 0118 983 2099

Policy reviewed annually unless regulations, law and advice changes

Issue number: 6

Last Review date: Feb 22

Next Review date: Feb 23

## Specific Roles and Responsibilities: Compliance

### The Managing Director and all Line Managers

1. The Managing Director and all line managers are responsible for the effective implementation of Ufton Court Educational Trust Ltd.'s Compliance policy within their department or area of control. They do so by:
  - Ensuring that all employees and volunteers directly reporting to them know, understand and accept their responsibility to Ufton Court Educational Trust Ltd Health & Safety policies and procedures.
  - Ensuring the requirements of Health & Safety legislation are applied and that Ufton Court Educational Trust Ltd.'s procedures are observed.
  - Carrying out both internal and external reviews of established safety measures and instigate further relevant changes or training to ensure full compliance to the range of legal and/or financial compliance and reporting duties that the charity has.
  - Have an understanding of risk. This will include the management of risk and the upkeep of the risk-register and ensuring that all documents include numerical risk analysis which will serve to guide management action and focus.
  - Ensuring new employees, volunteers and contractors have an induction which fully meets their needs, and employees have time to absorb training
  - Informing employees and volunteers of any areas of compliance encountered in the course of their work, including the necessary precautions to be taken, and of their duties to safeguard their own and other person's health and safety.
  - Making sure that all necessary protective equipment is appropriate to the task, readily available, within date, suitable for task and used at all times by the employees and volunteers in their section or area of control.
  - By making sure all employees and volunteers maintain the highest standards of housekeeping and orderliness in their section or area of control.
  - Identifying training needs concerning health and safety at work and arrange such training and instruction as may be necessary.
  - Identify training needs concerning legal compliance duties and arrange such training and instruction as may be necessary
  - Respond to any employee representations.
  - Ensure that the Trustees are fully briefed at all times.

### All Employees

2. All Ufton Court Educational Trust Ltd employees and volunteers are required to maintain processes or systems of work and wearing all appropriate Personal Protective Equipment provided for the activity.
3. All statutory required items of equipment and PPE will be provided at no cost to the employee / volunteer.
4. All Ufton Court Educational Trust Ltd employees and volunteers will receive appropriate levels of training according to their duties, the equipment they will operate and the numbers of persons they will supervise.
5. All employees and volunteers of the Ufton Court Educational Trust Ltd will:
  - Take responsible care of their own health, safety and welfare at work
  - Ensure that they are fully compliant with any external legal, financial and/or reporting duties
  - Follow any health, safety, compliance and welfare rules which apply to their duties.
  - Do what is reasonably practicable to ensure that other people, including members of the public, are not put at risk by their actions or failures.
  - Not misuse anything that has been provided in the interests of health, safety, compliance and welfare, such as propping open fire doors.
  - Not improvise or adapt any equipment so as to use it for a purpose for which it is not designed.
  - Report anything that might present a danger to either themselves or anybody else.

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6. All employees and volunteers are expected to cooperate with their managers and the Trustees to ensure the health, safety and welfare of themselves, visitors and colleagues. Any reasonable request that is not fully complied with, without good cause or reason, may be considered gross misconduct.
7. No person will be requested to work unsupervised unless they are comfortable to complete the task, have received relevant training and can demonstrate a competence level deemed acceptable by Ufton Court Educational Trust Ltd . It is recognized that in many cases experience is required when achieving a level of competence. Such experience will be provided under a supervision program carried out by the management of Ufton Court Educational Trust Ltd.

### **Specific Management Arrangements for Health and Safety Compliance [all departments]**

8. The Compliance Policy is one of 9 sub policies which support the overarching Health, Safety and Welfare Policy.

### **Risk Management Strategy and Controls**

9. All activities that make up Ufton Court Educational Trust Ltd are subject to a risk management program that reflects the risks identified and the controls required to negate the effects of the risk. Such a risk management program will include as a minimum:
  - Activity Risk Assessments designed to identify risks that may occur during the activity, and its probable causes.
  - Method statements or RAMS Documents devised for all activities and tasks completed by the staff of Ufton Court Educational Trust Ltd. Please see Appendix 1 for all RAMS documents associated with this Policy
  - Separate risk assessments are in place for various Ufton activities which outlines the requirements that must be adhered to in order to minimise the risk of employees and others spreading, or becoming infected by, COVID-19 when at work and undertaking activities. These risk assessments have been communicated to employees and other interested parties, and will be reviewed in line with Government Regulation, guidance and Public Health England advice to ensure that we provide a COVID-19 secure environment for our employees, volunteers, visitors, pupils and others.
  - Any foreseeable emergencies identified and the provisions made to manage that emergency should it arise
  - Activity and Facility Fire Risk Assessment, are used, or for those locations where the public or staff work or congregate.

### **Recording and Reporting of Incidents**

10. Activities under the control of Ufton Court Educational Trust Ltd are subject to the requirement of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 [RIDDOR] should an incident occur.
11. Ufton Court Educational Trust Ltd requires that the Board of Trustees be informed of any incident that has been reported to an enforcing authority and requires the contractor to provide a copy of such reports made.
12. Ufton Court Educational Trust Ltd will provide an incident/accident/near miss record form to be completed whenever an incident occurs that causes injury to a person or damage to property or plant no matter how slight.
13. The following process is followed to ensure accurate recording of accident, incidents and near misses. There will also be a record kept by the Staff member or First Aider of the treatment they gave and any person who assisted them. These reports will be reviewed and changes to procedures made where identified as necessary.

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## Departmental Specific Managements Arrangements

### The Management of Compliance

#### Legal

14. All activities are subject to regular reviews of risk assessments and are inspected by external competent persons.
15. All activities and provisions will be fully compliant with the current requirements of legislation and in particular "The Management of Health and Safety Regulations 1999".
16. The Trust is fully compliant with any relevant reporting requirements
17. The Trust is fully compliant with any legal requirements including the monitoring of water supplies for Legionella, monitoring of the septic tank, Fire regulations, COSHH regulations, electrical wiring, and annual certification of apparatus where relevant
18. The Trust holds Insurance policy which is renewed annually
19. The Trust holds a number of Licences which are renewed according to the Licence requirements: Off-com (walkie talkie radios), EG Playing recorded Music, Ceremony and Personal Licences, Septic Tank discharge, Doorperson's Licences
20. The Trust complies with the Englefield Estate lease requirements which also includes Historic England requirements around the Grade 1 listing
21. The Trust seeks to be fully compliant in all areas where it needs to be and employs an external Health and Safety Advisor to advise on Health and Safety areas it needs to instate, improve or revise. The Health and Safety advisor is also employed to ensure that the SLT are kept fully up to date with changes in relevant legislation

#### Finance

22. The Trust is fully compliant with the Companies Act 2006, the Charities Act 2011 and follows recommendations found in the Statement of Recommended Practice Accounting (SORPFRS 102 October 2019). The Trust has an external audit each year
23. The Trust has a robust Financial Overview which it controls. This includes a financial strategy, budget planning and control, risk analysis and audit. The Trustees have an overview and receive a budget report at every meeting, the Financial Trustee receives monthly updates

#### H.R. and Safeguarding

24. The Trust operates a Safe Recruitment Policy and is fully compliant with legislation concerning 'Keeping Children Safe in Education, 2018', employment, equal opportunities, training and salaries; providing safe food; safeguarding; security of information and data; the right to work in the country; pensions; salaries; working hours directives; contracts; and also has a Company handbook for employees. The Trust has recently recruited a specialist Trustee who will have oversight of HR
25. The Trust has a Safeguarding Policy which protects and safeguards children, employees and visitors; it also has a named Safeguarding Officer and 2 deputies. The Trust invite external assessment on a regular basis from the west Berkshire Council Child Safeguarding Team

#### Marketing and Fundraising

26. The Trust operates an ethical approach to fundraising and marketing and is a member of the Fundraising Regulator. The Trust is fully compliant with all legal requirements of Fund raising

#### I.T. and Data Protection

27. The Trust operates robust IT and Data/Information security procedures which meets legal requirements and industry best practice. It is GDPR compliant
28. The Trust has a strict code of conduct with regards to Web content and Social Media
29. The Trust's IT network is supported by an external organisation- Unify who are the only people allowed to add software and offer advice.

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## **Location Facilities, Structures and Infrastructure Management**

30. All facilities, structures and location infrastructure, including roadways and pathways, will be subject to a Planned Preventative Maintenance program to ensure they are maintained to as high as practicably possible level.
31. The minimum standard considered acceptable is that the following will be in place:
  - A selection process and proactive monitoring programme to ensure it is “Fit for Purpose”. Such programmes will include hinges, latches to ensure failure is identified before it occurs.
  - A specified inspection process operated by the member of staff who is directed as responsible for its daily use. Such inspection programmes will take into account manufactures recommended regimes and additional inspections as considered appropriate.
  - A Periodical Inspection by a Competent Person in line with both the legal requirements for that item of plant or equipment and the manufactures guidance as laid down in the Manufactures Handbook.
  - A defect reporting and management procedure that ensures the defect is dealt with in a timely manner. Such a system will also stipulate what defects renders the area unsafe for use. The defects system will also ensure a signature of inspection before return to operational duty is completed by a competent person.
32. All staff who, are required to participate in this monitoring programme will be trained to ensure they are deemed competent to the level required.

## Appendix 1

### Associated RAMS documents

#### Compliance

- Comp1. Conflict of Interest
- Comp2. Handling complaints
- Comp3. Whistleblowing
- Comp4. Remuneration
- Comp5. Management Control of Data
- Comp6. Back up
- Comp7. Server
- Comp8. Management Control of Staffing
- Comp9. Septic Tank
- Comp10. Email and Social media behaviour
- Comp11. Discharge of charitable objectives
- Comp12. Failure to comply with regulatory reporting
- Comp13. Failure to comply with legislation
- Comp14. Reputational damage
- Comp15. Lack of public awareness
- Comp16. Englefield Lease
- Comp17. Loss of utilities
- Comp18. Equality of opportunity
- Comp19. Legionella
- Comp20. Smoking
- Comp21. Disposal of Waste
- Comp22. Branding
- Comp23. Safe recruitment
- Comp24. Marketing
- Comp25. Anti-trafficking and Slavery
- Comp26. Companies' Secretarial
- Comp27. Fundraising Teen party
- Comp28. Managing Asbestos
- Comp29. Website
- Comp30. GDPR and fundraising
- Comp31. GDPR and HR Processes
- Comp32. GDPR and weddings
- Comp33. GDPR and management of safeguarding
- Comp34. GDPR and use of children's data for research
- Comp35. GDPR and school booking processes
- Comp36. GDPR and payrolls and pensions
- Comp37. GDPR and data barring
- Comp38. GDPR and HR processes – appraisal and disciplinary
- Comp 39 Health and Safety Auditing
- Comp 40 Environment and Sustainability

RAMS review date before:

End of Sept 2022

COVID19 RAMS kept under review

## **Compliance/Financial**

- Comp/Fin1. Booking forms and Invoices
- Comp/Fin2. Bursary Procedures
- Comp/Fin3. Credit Control
- Comp/Fin4. Debit card purchases
- Comp/Fin5. Expense payments
- Comp/Fin6. Invoicing
- Comp/Fin7. Educational Groups Residential booking
- Comp/Fin8. Payroll
- Comp/Fin9. Pensions
- Comp/Fin10. Petty cash
- Comp/Fin11. Management control of financial issues
- Comp/Fin12. Purchase ledger procedures
- Comp/Fin13. Management of Sage
- Comp/Fin14. Ethical Fundraising
- Comp/Fin15. Pay-pal and other online payments
- Comp/Fin16. Credit card receipts
- Comp/Fin17. Credit Card Purchases
- Comp/Fin18. Pandemic effects on Business
- Comp/Fin19 Fundraising Static collection boxes
- Comp/Fin20 Anti staff corruption and bribery

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