

# Infinite Wellbeing C.I.C.



## Alternative Provision Statements, Policies and Procedures

This policy was adopted by Infinite Wellbeing	Date: 28 <sup>th</sup> June 2024
Date of review: 27 <sup>th</sup> June 2025	Signed by: R J Patrick

## Contents

Organisation Chart.....	2
Recruitment, selection and career development.....	4
Safeguarding Policy.....	4
Procedure for Internal Moderation.....	7
Statement on Access to Fair Assessment.....	8
Procedure for dealing with Complaints.....	9
Procedure for dealing with Candidate Enquiries, Requests for Review of Marks (EPQ) and Appeals against Assessment Decisions.....	10
Procedure for dealing with Malpractice / Maladministration.....	11
Health and Safety Policy.....	12
Equality and Diversity Policy / Statement.....	14
Conflict of Interest Policy and procedure - Infinite Wellbeing Policy.....	15
Statement on Candidate Support (could include): -.....	17
Withdrawal Policy /Statement.....	17
Data Protection Policy / Statement and Privacy Notice.....	18
Policy / Statement on working with Satellites & 3rd Party Partnership Arrangements (where applicable).....	21
Assessment Planning: Procedure for delivery of required GLH and recording of assessment and related assessment plans.....	22

## Organisation Chart

The Alternative Curriculum aims to enable students the opportunity to develop skills and experiences that might not be available or achievable within a mainstream education. The curriculum allows the scope and flexibility to take on students throughout the academic year who are at risk of being disappplied.

The Alternative Curriculum offers students the chance to become more independent and have a positive experience in KS2, KS3 and KS4. This will then allow students to enjoy their own learning beyond the classroom following a Vocational and Enrichment programme. This alternative pathway provides all students a chance to thrive, prosper and succeed at their own pace. All students will undertake a range of qualifications at the appropriate level to ensure post-school progression into a positive destination. To further develop the knowledge, skills and qualities to support them to take a meaningful and worthwhile place in society. Develop the skills for life, learning and work and experience challenge and success.

# Alternative Provision Organisation Chart

## Management

**Kevin - Centre  
Administrator**

**Rebecca -  
DSL, GDPR &  
H&S Lead**

**Helen N -  
Finance  
Lead**

## Teaching

**Oli**

**Dalton**

**Brandon**

**Catherine**

**Helen S**

## Recruitment, selection and career development

The Organisation will endeavour, through appropriate training, to ensure that employees making selection and recruitment decisions will not discriminate, whether consciously or unconsciously, in making these decisions.

Promotion and career development will be made on merit. If you have any specific needs, the Organisation will accommodate and support you as far as practicable. All decisions relating to this will be made within the overall framework and principles of this policy.

Job descriptions, where used, will be in line with this equality, diversity and inclusion policy. Job requirements will be reflected accurately in any person specifications. The Organisation will adopt a consistent, non-discriminatory approach to the advertising of vacancies.

The Organisation will not confine its recruitment to areas or social media sources that provide only, or mainly, applicants of a particular group.

All applicants who apply for jobs with the Organisation will receive fair treatment and will be considered solely on their ability to do the job.

All employees involved in the recruitment process will periodically review their selection criteria to ensure that they are related to the job requirements and do not unlawfully discriminate.

Short listing and interviewing will be carried out by more than one person where possible. Interview questions will be related to the requirements of the job and will not be of a discriminatory nature.

The Organisation will not reject any applicant because they are unable to complete an application form unassisted unless personal completion of the form is a valid test of the standard of English required for the safe and effective performance of the job.

Staff at Infinite Wellbeing responsible for leading ASDAN qualifications will have had the appropriate training, will engage with regular staff meetings, and will keep their training up to date. Other staff teaching on the courses will receive cascaded training from the ASDAN Coordinator.

## Safeguarding Policy

Infinite Wellbeing is committed to building a 'culture of safety' in which the people in our care are protected from abuse, harm and radicalisation.

Infinite Wellbeing will respond promptly and appropriately to all incidents or concerns regarding the safety of a person that may occur. The safeguarding procedures comply with all relevant legislation.

### Child abuse and neglect

Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. An individual may abuse or neglect a child directly, or by failing to protect them from harm. Some forms of child abuse and neglect are listed below.

- **Emotional abuse** is the persistent emotional maltreatment of a child so as to cause severe and persistent adverse effects on the child's emotional development. It may involve making the child feel that they are worthless, unloved, or inadequate. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.
- **Physical abuse** can involve hitting, shaking, throwing, poisoning, burning, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may be also caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child.

- **Sexual abuse** involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. This can involve physical contact, or non-contact activities such as showing children sexual activities or encouraging them to behave in sexually inappropriate ways.
- **Neglect** is the persistent failure to meet a child's basic physical and emotional needs. It can involve a failure to provide adequate food, clothing and shelter, to protect a child from physical and emotional harm, to ensure adequate supervision or to allow access to medical treatment.

#### **Signs of child abuse and neglect**

Signs of possible abuse and neglect may include:

- significant changes in a child's behaviour
- deterioration in a child's general well-being
- unexplained bruising or marks
- comments made by a child which give cause for concern
- inappropriate behaviour displayed by a member of staff, or any other person. For example, inappropriate sexual comments, excessive one-to-one attention beyond the requirements of their role, or inappropriate sharing of images.

#### **If abuse is suspected or disclosed**

When a child makes a disclosure to a member of staff, that member of staff will:

- reassure the child that they were not to blame and were right to speak out
- listen to the child but not question them
- give reassurance that the staff member will take action
- record the incident as soon as possible (see *Logging an incident* below).

If a member of staff witnesses or suspects abuse, they will record the matter

straightaway using the **Logging a concern** form. If a third party expresses concern that a child is being abused, we will encourage them to contact Social

Care directly. If they will not do so, we will explain that the company is obliged

to and the incident will be logged accordingly.

**If you believe that any child is in danger ring Call Derbyshire tel: 01629 533190 choosing the option for urgent child protection calls at any time.**

**Or contact the police by ringing their call centre number tel: 101 (24 hours per day).**

#### **Peer-on-peer abuse**

Children are vulnerable to abuse by their peers. Peer-on-peer abuse is taken seriously by staff and will be subject to the same child protection procedures as other forms of abuse. Staff are aware of the potential uses of information technology for bullying and abusive behaviour between young people.

Staff will not dismiss abusive behaviour as normal between young people. The presence of one or more of the following in relationships between children should always trigger concern about the possibility of peer-on-peer abuse:

- Sexual activity (in primary school-aged children) of any kind, including sexting

- One of the children is significantly more dominant than the other (eg much older)
- One of the children is significantly more vulnerable than the other (eg in terms of disability, confidence, physical strength)
- There has been some use of threats, bribes or coercion to ensure compliance or secrecy.

**If peer-on-peer abuse is suspected or disclosed**

We will follow the same procedures as set out above for responding to child abuse.

**Extremism and radicalisation**

All childcare settings have a legal duty to protect children from the risk of radicalisation and being drawn into extremism. There are many reasons why a child might be vulnerable to radicalisation, eg:

- feeling alienated or alone
- seeking a sense of identity or individuality
- suffering from mental health issues such as depression
- desire for adventure or wanting to be part of a larger cause
- associating with others who hold extremist beliefs

**Signs of radicalisation**

Signs that a child might be at risk of radicalisation include:

- changes in behaviour, for example becoming withdrawn or aggressive
- claiming that terrorist attacks and violence are justified
- viewing violent extremist material online
- possessing or sharing violent extremist material

If a member of staff suspects that a child is at risk of becoming radicalised, they will record any relevant information or observations on a **Logging a concern** form, and refer the matter to the CPO.

**Logging a concern**

All information about the suspected abuse or disclosure, or concern about radicalisation, will be recorded on the **Logging a concern** form as soon as possible after the event. The record should include:

- date of the disclosure, or the incident, or the observation causing concern
- date and time at which the record was made
- name and date of birth of the child involved
- a factual report of what happened. If recording a disclosure, you must use the child's own words
- name, signature and job title of the person making the record.

The record will be given to the designated safeguarding officer, Rebecca Patrick, who will decide on the appropriate course of action.

**Allegations against staff**

If anyone makes an allegation of child abuse against a member of staff:

- The allegation will be recorded on an **Incident record** form. Any witnesses to the incident should sign and date the entry to confirm it.
- The allegation may need to be reported to the Local Authority Designated Officer (LADO). The LADO will advise if other agencies (e.g. police) should be informed, and the company will act upon their advice. A Derby and Derbyshire LADO Form will be completed and emailed to [professional.allegations@derbyshire.gov.uk](mailto:professional.allegations@derbyshire.gov.uk).
- Following advice from the LADO, it may be necessary to suspend the member of staff pending full investigation of the allegation.

- If appropriate Infinite Wellbeing will make a referral to the Disclosure and Barring Service.

#### **Promoting awareness among staff**

Infinite Wellbeing promotes awareness of abuse and the risk of radicalisation through its staff training. Infinite Wellbeing ensures that:

- Staff have relevant experience and receives appropriate training in safeguarding
- Safeguarding training is refreshed every two years.
- safe recruitment practices are followed for all new staff
- all staff have a copy of this **Safeguarding policy**, understand its contents and are vigilant to signs of abuse, neglect or radicalisation
- all staff are aware of their statutory duties with regard to the disclosure or discovery of child abuse, and concerns about radicalisation
- all staff receive basic safeguarding training, and safeguarding is a permanent agenda item at all staff meetings
- Infinite Wellbeing's procedures are in line with the guidance in 'Working Together to Safeguard Children (2015)' and staff are familiar with the guidance in 'What To Do If You're Worried A Child Is Being Abused (2015)'.

#### **Use of mobile phones and cameras**

Photographs will only be taken of children taking part in activities with their parents' permission. During working hours, employees can only use technology such as mobile phones, social media, or the Internet for personal use when they are on a break. Mobile phones will be kept in the staff room or office during each shift.

## **Procedure for Internal Moderation**

Internal moderation is a key process carried out by centres, throughout the delivery of a Qualification, to ensure that assessment methods are consistent across all Tutors/Assessors and that outcomes are fair to all students.

Assessors include: Rebecca, Cheryl, Helen S and Fiona.

Internal Moderators include: Kev and Bridget.

Evidence of a robust internal moderation system will be required at external moderation and for audit purposes; therefore there must be reliable and auditable record-keeping systems in place

It is the responsibility of all staff to participate in the moderation process by keeping the necessary records, attending relevant meetings and submitting marked candidate work as requested.

All assessment evidence that has been internally moderated must be kept on site until after the external moderation. The work remains the property of the candidate and can be returned to the candidate according to the requirements of the relevant awarding organisation.

The aim of this policy is to ensure that:

- internal moderation practices are valid and reliable, cover all tutors/assessors



- and meet the requirements of the awarding organisation
- the internal moderation procedures are fair and open
- accurate and detailed records are kept of internal moderation decisions

The centre will:

- ensure that all assessment activities are valid, appropriate and fit for purpose
- apply a strategy that will provide a representative sample across all tutor/assessors create a plan of internal moderation in relation to all assessment activities
- define, maintain and support effective internal moderation roles, including the provision of training where required
- provide standardised documentation to support internal moderation activity and record- keeping
- ensure that feedback and outcomes of internal and external moderation support future development of good practice
- carry out an annual evaluation and review of internal moderation policy and procedures

## Internal Moderation Process

### Term 2

- First round of formative internal moderation to be conducted with colleagues from Infinite Wellbeing Education Alternative Provision. All student work will be moderated if numbers < 5. One copy of feedback sheet to be given to the assessor, one to be stored centrally in the centre portfolio for auditable purposes. Meeting held to discuss issues arising from first round of internal moderation.  
Minutes taken.

### Term 3

- Second round of formative internal moderation to be conducted. Documentation to be
- copied as before and stored in the centre portfolio. Any action noted by IQA on the first round to be checked and signed off. Meeting held to discuss issues arising.

### Term 4

- Co-ordinator to establish candidates and units to be put forward for external moderation (as required) Summative internal moderation to be conducted
- Arrangements to be made for External Moderation

### Term 5

- External moderation takes place. Meeting to be arranged to discuss feedback from External Moderation and plan put in place to address any issues arising

Internal Moderation for other ASDAN courses to take place throughout the year depending on courses being offered to students in different year groups. On-going monitoring of courses discussed within the fortnightly Department meeting.

## Statement on Access to Fair Assessment

**Statement of Assessment** We aim to provide a variety of qualifications which provide all students with the opportunity to achieve their full potential by the most appropriate and direct route. Our Assessment Policy is based on the concepts of equality, diversity, clarity, consistency and openness. We will endeavour to ensure that the assessment processes are implemented in a way which is fair and non-discriminatory.

### Access

Students are made aware of the existence of this policy and have open access to it. It can be found in the Centre's ASDAN Portfolio. All tutors are made aware of the contents and purpose of this policy. This policy is reviewed annually and may be revised in response to feedback from students, tutors and external organisations.

### What students can expect from us

- We aim to ensure that all assessment of work is carried out fairly and in keeping with the awarding body's requirements.
- All portfolio-based work will be assessed fairly against the qualification standards and teachers involved will be fully trained.
- Internal assessments will be carried out fairly and according to awarding body instructions.
- Externally marked tests and exams will be according to the requirements of the awarding body.

### Students can also expect:

- To be fully inducted onto a new course and given information that can be shared with parents and carers.
- Learning outcomes, performance criteria and other significant elements of learning and assessment to be made clear at the outset of the course and when assignments are set.
- To be given appropriate assessment opportunities during the course with feedback provided on the quality of the work.
- All work to be marked within two weeks of submission by the student.
- Where equivalents and exemptions can be applied, we will ensure this is pursued with the relevant awarding body.

### Cheating and Plagiarism

A fair assessment of a student's work can only be made if that work is entirely the student's own. Therefore, students can expect an awarding body to be informed if:

- They are found guilty of copying, giving or sharing information or answers, unless part of a joint project
- They use an unauthorised aid during a test or examination
- They copy another student's answers during a test or examination
- They talk during a test or examination.

All allegations of cheating and plagiarism will lead to a full investigation which will follow the guidance of the relevant awarding body. If a student feels he/she has been wrongly accused of cheating or plagiarism, they should be referred to the

Complaints Policy.

## Procedure for dealing with Complaints

At Infinite Wellbeing we aim to work in partnership to deliver a high-quality service for everyone. If, for any reason we fall short of this goal, we would like to be informed in order to amend our practices for the future. Our complaints policy is available at all times. Records of all complaints are kept for at least three years. A summary of complaints is available on request.

The manager is usually responsible for dealing with complaints. If the complaint is about the manager, the registered person or other senior member of staff will investigate the matter. Any complaints received about staff members will be recorded on an **Incident log** and a **Complaints log** will be completed. Any complaints made will be dealt with in the following manner:

### Stage one

Complaints about aspects of sessional activity:

- The manager will discuss the matter informally with the parent or carer concerned and aim to reach a satisfactory resolution.

Complaints about an individual staff member:

- If appropriate the complainant will be encouraged to discuss the matter with staff concerned.
- If the complainant feels that this is not appropriate, the matter will be discussed with the manager, who will then discuss the complaint with the staff member and try to reach a satisfactory resolution.

### Stage two

If it is impossible to reach a satisfactory resolution to the complaint through informal discussion, the complainant should put their complaint in writing to the manager. The manager will:

- Acknowledge receipt of the letter within 7 days.
- Investigate the matter and notify the complainant of the outcome within 28 days.
- Send a full response in writing, to all relevant parties, including details of any recommended changes to be made to Infinite Wellbeing's practices or policies as a result of the complaint.
- Meet relevant parties to discuss Infinite Wellbeing's response to the complaint, either together or on an individual basis.

If the complaint relates to child care, you may wish to inform Ofsted by email or telephone: [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk) or 0300 123 4666

If child protection issues are raised, the manager will refer the situation to the Child Protection Officer, who will then contact the Local Authority Designated Officer (LADO) and follow the procedures of the **Safeguarding Children Policy**. If a criminal act may have been committed, the manager will contact the police.

## Procedure for dealing with Candidate Enquiries, Requests for Review of Marks (EPQ) and Appeals against Assessment Decisions

This policy addresses the situation where students may wish to appeal against a grade he/she has received for a qualification.

### Access

All staff and students are made aware of this policy and how to access it in order that students can be supported. This policy is reviewed annually and may be amended in response to feedback from students, staff, parents and external organisations.

### **Policy Statement**

All students at Infinite Wellbeing Education have the right to make an appeal about any of the marks received for the qualifications they are undertaking. If any student wishes to appeal a decision, they should follow the following procedure within 10 working days of receiving the disputed decision.

- If possible, speak to the member of staff responsible for teaching the qualification in the first instance about the reason they wish to appeal.
- The member of staff has a responsibility to explain to the candidate why he/she received the grade/mark.
- If the student is not satisfied with the explanation, the piece of work will be re-marked by another member of staff also involved with that qualification.
- The student will be informed of the outcome of the re-marking by letter within 2 weeks of their original appeal.

If the student wants to continue the appeal, he/she needs to contact the exams officer, who will provide the student with information about the appeals procedure for the relevant awarding body and explain what is involved

The exams officer will assist with the completion of any forms and will correspond with the awarding body on behalf of the student.

Please note: a student must have the support of the centre to be able to appeal against a result.

## **Procedure for dealing with Malpractice / Maladministration**

### **Candidate Malpractice**

This policy sets out to define the procedures to be followed in the event of any dispute or allegation regarding candidate malpractice in the assessment of internally marked qualifications and also regarding examinations marked externally.

### **Example of Maladministration**

Maladministration is any unintentional activity or practice that leads to non-compliance with ASDAN requirements. In suspected cases involving an ASDAN External Quality Assurer or other member of staff, ASDAN will conduct an investigation appropriate to the nature of the allegation.

### **Examples of Candidate Malpractice**

Attempted or actual malpractice activity will not be tolerated. The following are examples of malpractice by candidates with regards to portfolio-based qualifications. This list is not exhaustive:

- Plagiarism: the copying and passing of as the candidate's own work, the whole or part of another person's work

- Collusion: working collaboratively with other learners to produce work that is submitted as the candidate's only
- Failing to abide by the instructions of an assessor – This may refer to the use of resources which the candidate has been specifically told not to use
- The alteration of any results document - If a teacher suspects a candidate of malpractice, the candidate will be informed and the allegations will be explained. The candidate will have the opportunity to give their side of the story before any final decision is made. If the candidate accepts that malpractice has occurred, he/she will be given the opportunity to repeat the assignment. If found guilty of malpractice following an investigation, the teacher may decide to re-mark previous assignments and these could also be rejected if similar concerns are identified.

## **Appeals**

In the event that a malpractice decision is made, which the candidate feels is unfair, the candidate has the right to appeal in line the Appeals Policy.

## **Staff Malpractice Policy**

### **Introduction**

This policy sets out to define the procedures to be followed in the event of any dispute or allegation regarding staff malpractice in the assessment of internally marked qualifications.

### **Examples of Staff Malpractice**

- Attempted or actual malpractice activity will not be tolerated. The following are examples of malpractice by staff with regards to portfolio-based qualifications. This list is not exhaustive:
- Tampering with candidates work prior to external moderation/verification
- Assisting candidates with the production of work outside of the awarding body guidance
- Fabricating assessment and/or internal verification records or authentication statements

### **Staff Malpractice Procedure**

Investigations into allegations will be coordinated by Rebecca Patrick, who will ensure the initial investigation is carried out within ten working days. The person responsible for coordinating the investigation will depend on the qualification being investigated. The investigation will involve establishing the full facts and circumstances of any alleged malpractice. It should not be assumed that because an allegation has been made, it is true. Where appropriate, the staff member concerned and any potential witnesses will be interviewed and their version of events recorded on paper. The member of staff will be:

- informed in writing of the allegation made against him or her
- informed what evidence there is to support the allegation
- informed of the possible consequences, should malpractice be proven

- given the opportunity to consider their response to the allegations
- given the opportunity to submit a written statement
- given the opportunity to seek advice (as necessary) and to provide a supplementary statement (if required)
- informed of the applicable appeals procedure, should a decision be made against him/her
  - informed of the possibility that information relating to a serious case of malpractice will be shared with the relevant awarding body and may be shared with other awarding bodies, the regulators Ofqual, the police and/or professional bodies
  - If work is submitted for moderation/verification or for marking which is not the candidate's own work, the awarding body may not be able to give that candidate a result.

### **Staff Malpractice Sanctions**

Where a member of staff is found guilty of malpractice, Infinite Wellbeing Education may impose the following sanctions:

#### **Written warning**

Issue the member of staff with a written warning stating that if the offence is repeated within a set period of time, further specified sanctions will be applied.

#### **Training**

Require the member of staff, as a condition of future involvement in both internal and external assessments to undertake specific training or mentoring, within a particular period of time, including a review process at the end of the training

#### **Special conditions**

Impose special conditions on the future involvement in assessments by the member of staff

#### **Suspension**

Bar the member of staff in all involvement in the administration of assessments for a set period of time

#### **Dismissal**

Should the degree of malpractice be deemed gross professional misconduct, the member of staff could face dismissal from his/her post

#### **Appeals**

The member of staff may appeal against sanctions imposed on them. Appeals will be conducted in line with the schools Appeals Policy.

### **Health and Safety Policy**

Infinite Wellbeing C.I.C considers health and safety to be of utmost importance. We comply with The Health and Safety at Work Act 1974 and the Workplace (Health, Safety and Welfare) Regulations 1992 at all times.

Infinite Wellbeing C.I.C has appropriate insurance cover, including employer's liability insurance and public liability insurance.

Each member of staff follows the **Health and Safety** policy and is responsible for:

- Maintaining a safe environment
  - Taking reasonable care for the health and safety of themselves and others attending each session
  - Reporting all accidents and incidents which have caused injury or damage or may do so in the future
  - Undertaking relevant health and safety training when required to do so by the manager
- Any member of staff who disregards safety instructions or recognised safe practices will be subject to disciplinary procedures.

#### **Responsibilities of the registered person**

The registered person for the setting holds ultimate responsibility and liability for the safe operation of the company. The registered person will ensure that:

- The company's designated health and safety officer is Rebecca Patrick
- All staff receive information on health and safety matters, and receive training where necessary
- The **Health and Safety policy** and procedures are reviewed regularly
- Staff understand and follow health and safety procedures
- Resources are provided to meet Infinite Wellbeing C.I.C's health and safety responsibilities
- All accidents, incidents and dangerous occurrences are properly reported and recorded. This includes informing the relevant agencies and the Health and Safety Executive under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995) where appropriate.
- All reported accidents, incidents and dangerous occurrences are reviewed, so that preventative measures can be taken.

#### **Responsibilities of the manager**

The session manager is responsible for ensuring that at each session:

- Premises are clean, well lit, adequately ventilated and maintained at an appropriate temperature
- All equipment is safely and securely stored
- A working telephone is available on the premises at all times
- Chemicals and cleaning materials are stored appropriately, and in accordance with COSHH data sheets.
- External pathways are cleared in severe weather
- Daily environment checks are carried out in accordance with our **Risk Assessment policy**.

#### **Security**

Children are not allowed to leave the premises during the session unless prior permission has been given by the parents.

During sessions all external doors are kept locked, with the exception of fire doors which are alarmed. Staff monitor the entrances and exits to the premises throughout the session.

All visitors must sign the 'Visitor Log' and give the reason for their visit. Visitors will never be left alone with participants.

Security procedures will be regularly reviewed by the manager, in consultation with staff and parents.

## **Equipment**

All equipment is kept clean, well maintained and in good repair. Infinite Wellbeing C.I.C selects equipment and resources with care, and carries out risk assessments before participants are allowed to use them. Broken equipment is disposed of promptly.

We ensure that any flammable equipment is stored safely.

## **Food and personal hygiene**

Staff at Infinite Wellbeing maintain high standards of personal hygiene, and take all practicable steps to prevent and control the spread of infection.

- A generally clean environment is maintained at all times.
- Toilets are cleaned daily and soap and hand drying facilities are always available.
- Staff are trained in food hygiene and follow appropriate guidelines.
- Waste is disposed of safely and all bins are kept covered.
- Cuts and abrasions are kept covered.

## **Dealing with body fluids**

Spillages of blood, vomit, urine and faeces will be cleaned up immediately.

## **Staffing levels**

Staff ratios and levels of supervision are always appropriate to the number, ages and abilities of the children present, and to the risks associated with the activities being undertaken.

## **Equality and Diversity Policy / Statement**

The Organisation is fully committed to providing equal opportunities for all staff, volunteers, students and job applicants. The Organisation aims to create a culture that encourages and values diversity and that appoints, rewards and promotes staff based on merit.

It is unlawful to discriminate against any staff member, volunteer, student or job applicant because of any “protected characteristic”, namely age, disability, gender reassignment, marriage or civil partnership status, pregnancy and maternity, race (including colour, nationality and ethnic or national origin), religion or belief, sex or sexual orientation.

The aim of the policy is to ensure no one is discriminated against either directly or indirectly on any unlawful grounds.

The Organisation has overall responsibility for ensuring that this policy is implemented in accordance with the appropriate statutory requirements and full account will be taken of all available guidance and in particular any relevant Codes of Practice.

The Organisation will maintain a neutral working environment in which no worker feels under threat or intimidated.

Discrimination is unacceptable and breaches of the policy will lead to disciplinary proceedings and, if appropriate, disciplinary action.

## **Language**

It is important to understand the different language that is used to describe identity, as this can be a difficult and sensitive area, and is continually evolving. For example:

- Some people have a gender identity that does not match the gender they were assigned at birth. This is known as being ‘transgender’ or ‘trans’, and commonly includes those within the protected characteristic of gender reassignment contained within Equality legislation as well as those with non binary identities;



- 'Non-binary' is used to describe someone who does not identify as male or female. They may identify as neither man or woman, both man and woman, fluid between the two or outside of that binary entirely;
- 'Transitioning' or 'gender reassignment' is a process by which a person aligns their life and physical identity to match their gender identity. It is the process of moving towards a permanent, full time adaptation of a gender identity across all aspects of life, including work. Each person's transition will be unique. For some, it will involve medical intervention, such as hormone therapy and surgeries, but not all trans people want or are able to have this;
- 'Cisgender' refers to where someone's gender identity aligns with the sex they were assigned at birth.

The Organisation recognises that using language that is outdated or which the individual considers inappropriate can cause offence.

The Organisation recognises that sexual orientation is a separate issue to gender identity. Gender does not imply any particular sexual orientation; a transgender person may be heterosexual, gay, lesbian, bisexual or asexual. Employees should not assume that a transgender colleague has any particular sexual orientation. After transition, a person's sexual orientation may stay the same or may change.

Individuals will self-identify. How they choose to describe themselves should be respected.

### **Names and pronouns**

Employees will be addressed by the name and pronouns that correspond to their gender identity and that which they have requested to be used at all times.

Intentionally and/or persistently mis-gendering or using students' or colleagues' previous names may amount to harassment or bullying and will not be tolerated. Breaches of this policy will be treated in a serious manner and dealt with under the Organisation's disciplinary procedure.

## **Conflict of Interest Policy and procedure - Infinite Wellbeing Policy**

### Definition of conflict of interest

A conflict of interest is a situation in which an individual, or organisation, has competing interests or loyalties. In the case of an individual, the conflict of interest could compromise or appear to compromise their decisions if it is not properly managed.

Conflicts of interest can arise in a variety of circumstances for example: When an individual has a position of authority in one organisation that conflicts with his or her interests in another organisation. When an individual has interests that conflict with his or her professional position. Where someone works for or carries out work on the organisation's behalf but may have personal interests – paid or unpaid – in another business. Where someone works for or carries out work on the organisation's behalf, who has friends or relatives taking assessments or examinations.

What is a Conflict of Interest? In this context, a Conflict of Interest occurs where any member of staff who has access to privileged information, or is responsible for making decisions about assessment outcomes, could, potentially, use that information, or their position, to give an unfair advantage to a close friend or relative entered for an examination/assessment at your or any other centre. The term 'Related People' is used to cover close friends or relatives. A Conflict of Interest also occurs if any

member of your centre's staff is entered for an examination/assessment.

Who are 'Related People'? 'Related People' are those with whom the member of staff has a close relationship. It would certainly include spouses, children and siblings, but would also include close friends, relatives and members of the household where there is regular contact, such that privileged information might be shared inappropriately. A step-relative, cousin, niece, etc., would count if the contact with that person was close and frequent.

## 1. Introduction

1.1. This Conflict of Interest Policy has been developed to outline obligations and expected best practice, as well as provide guidance in dealing with any unavoidable conflicts of interest, as they may arise.

1.2. All Infinite Wellbeing directors, managers and other staff (including volunteers) have an obligation to act in the best interests of both the organisation in accordance with any policy documents.

1.3. Conflicts of interests may arise where an individual's personal or family interests and/or loyalties conflict with those of Infinite Wellbeing. Such conflicts may create problems; they can:

- Inhibit free discussion
- Result in decisions or actions that are not in the interests of the organisation
- Risk the impression that Infinite Wellbeing has acted improperly.

1.4. Specifically, conflicts of interests include matters of material and financial benefit, as well as those involving reputation or other more intangible factors.

1.5. The aim of this policy is to provide guidance to prevent Infinite Wellbeing, along with all employees from becoming involved in any impropriety, or even appearance of such.

## 2. Declaration of Interests

2.1. Accordingly, we expect Infinite Wellbeing directors, managers and other staff (including volunteers) to freely, openly and honestly declare all and any of their interests, in full and without reservation, in students, suppliers, customers and/or competitors, whether financial or other. 2.2. Further, we expect Infinite Wellbeing directors, managers and other staff (including volunteers) to freely, openly and honestly declare all and any gifts or hospitality (over a value of £20) received in connection with their role in the organisation, whether from suppliers, customers and/or competitors, whether financial or other.

2.3. Further, we do not expect Infinite Wellbeing directors, managers and other staff (including volunteers) to accept any gifts or hospitality from students and/or their parents/guardians, unless of only nominal value. All offers of gifts or hospitality from students and/or their parents/guardians must be reported in writing to the Directors.

2.4. Declarations of interest should be detailed in writing and directed to the directors.

2.4.1. To be effective, the declaration of interest needs to be updated at least annually and when any changes occur. If you are not sure what to declare, or whether/when your declaration needs to be updated, please err on the side of caution. Any staff member considering paid or unpaid work outside of the organisation should inform their manager if they think there is any potential for a conflict of interest. If the staff member is unsure whether a conflict of interest might arise, they should discuss this

with their line manager first. The line manager should contact the directors if they need advice on whether a situation presents a conflict and a record should be kept of the discussion. A staff member must not take on any such activities that could be deemed to compete or conflict with the organisation's activities.

### 3. Conflict of Interests

3.1. Infinite Wellbeing directors, managers and other staff are expected to declare all and any potential conflict of interests at the earliest opportunity.

3.2. Where any potential conflict of interests may arise in relation to students, contracts, negotiations, pricing or other factor, where the person is directly related or has interest in the other party, Infinite Wellbeing directors, managers and other staff are expected to recuse themselves from discussions, negotiations etc., unless directed by the Managing Director otherwise. Prior to, or at the earliest convenience, all staff and other individuals, must inform the directors of any students at the school who are family members, other relatives or friends.

3.2.1. This does not include where the benefits are universal, or where the benefit is insignificant. Nevertheless, all interests are expected to be declared formally and in advance (wherever possible). All decisions regarding what qualifies as a significant interest is that of the directors. These decisions are final and not subject to appeal.

3.2.2. Where required the directors will convene a formal meeting.

This meeting will decide:

- The nature and extent of the conflict
- The actions taken to manage the conflict.

### **Statement on Candidate Support (could include):**

- initial assessment and induction: Students at Infinite Wellbeing will be offered access to a variety of informal qualifications to include ASDAN Certificate of Personal Effectiveness.
- Students will have fair and consistent access to qualifications and assessments.
- Students who are assessed as requiring additional support, e.g. a scribe, additional time or communication tools and devices will have their needs recorded in their file and will receive the relevant support.
- obtaining a Unique Learner Number (ULN): All students attending Infinite Wellbeing receive a ULN number which is held on within their file.
- credit transfer, exemption and Recognition of Prior Learning: Students following the Alternative Curriculum at Infinite Wellbeing may transfer credits obtained from previous ASDAN short courses provided in accordance with ASDAN guidelines and regulations.

### **Withdrawal Policy /Statement**

Reasons for withdrawing a qualification

There are a number of reasons why a qualification might be withdrawn by Infinite

Wellbeing, including:

- lack of demand for the qualification
- qualification no longer meets the needs of the student population
- qualification subject matter is no longer relevant
- units and qualifications are owned by other awarding organisations who have decided to withdraw
- lack of funding

Infinite Wellbeing qualification withdrawal process

### **Stage 1 – Decision to withdraw**

All current Infinite Wellbeing qualifications will be reviewed by the person designated as having responsibility for Accreditation, annually or more frequently if the situation requires. They will consider entry data, attainment levels, qualification relevance and regulatory changes. In the event that a decision is made to withdraw a qualification a report outlining the rationale will be developed and signed off by the directors.

### **Stage 2 – Managing the Withdrawal**

Upon the decision being made to withdraw a qualification, a withdrawal plan will be formulated. The plan will comply with any requirements as stated by Ofqual and may include arrangements for learners to complete programmes of work at an alternative centre. The plan will:

- specify how the interests of learners in relation to the qualification will be protected.
- detail how the withdrawal will be communicated to the awarding organisation, regulatory authorities, centres and learners providing details of all deadlines including the last date for accepting entries and the last date for certification.

Procedure for Quality Assurance Review of the Qualification (review and feedback, monitoring learner progress)

The planning of ASDAN Qualifications is the responsibility of the directors and teaching team. Each group of students has different needs and abilities that staff aim to harness by the careful choosing of units. Discussions regarding the day to day running of all ASDAN courses at Infinite Wellbeing are discussed every fortnight during the team meeting. Staff and student surveys will be used to review the ASDAN courses being delivered.

## **Data Protection Policy / Statement and Privacy Notice**

### **BACKGROUND:**

Infinite Wellbeing C.I.C. understands that your privacy is important to you and that you care about how your personal data is used. We respect and value your privacy and as described below, We do not collect personal data about you unless you provide us with it. Any personal data We do collect will only be used as permitted by law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of this Privacy Policy is deemed to occur when you have read the policy. If you do not accept and agree with this Policy, you must inform us in writing immediately.

### **Information About Us**

Our organisation, Infinite Wellbeing C.I.C, is a limited company registered in England under company number 13103465.

Data Protection Officer: Rebecca Patrick.

Email address: info@infinite-wellbeing.co.uk

Telephone number: 07435168707

Postal Address: Infinite Wellbeing C.I.C. 36 Ella Bank Road, Heanor, Derbyshire DE75 7HF

### What Does This Policy Cover?

This Data Protection and GDPR Policy applies only to Infinite Wellbeing's use of your personal data.

### What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also

covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

### What Are My Rights?

Under the GDPR, you have the following rights, which We will always work to uphold:

The right to be informed about Our collection and use of your personal data. This Policy should tell you everything you need to know, but you can always contact Us to find out more or to ask any questions using the details in Part 10.

The right to access the personal data We hold about you. Part 9 will tell you how to do this.

The right to have your personal data rectified if any of your personal data held by Us is inaccurate or incomplete. Please contact Us using the details in Part 10 to find out more.

The right to be forgotten, i.e. the right to ask Us to delete or otherwise dispose of any of your personal data that We have.

The right to restrict (i.e. prevent) the processing of your personal data.

The right to object to Us using your personal data for a particular purpose or purposes. The right to data portability. This means that, if you have provided personal data to Us directly, We are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask Us for a copy of that personal data to re-use with another service or business in many cases.

Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about Our use of your personal data or exercising your rights as outlined above, please contact Us using the details in Part 10.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about Our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

### What Personal Data Do You Collect?

If you send Us an email, paper based form or online form, We may collect your name, address, your email address, and any other information which you choose to give Us.

### How Do You Use My Personal Data?

If We do collect any personal data, it will be processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see below.

If you contact Us and We obtain your personal details from your email or inquiry, We may use them to respond to you.

You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it.

We will not share any of your data with any third parties for any purposes other than storage on an email server.

#### How and Where Do You Store My Data?

We will only store your personal data in the UK. Personal data will be stored in accordance with GDPR and a limited number of staff members will have access to the information. This means that it will be fully protected under the GDPR

#### Do You Share My Personal Data?

We will not share any of your personal data with any third parties for any purposes, subject to one important exception.

In some limited circumstances, We may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If any of your personal data is transferred to a third party, as described above, We will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, Our obligations, and the third party's obligations under the law, as described above.

#### How Can I Access My Personal Data?

If you want to know what personal data We have about you, you can ask Us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal addresses shown below.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover Our administrative costs in responding.

We will respond to your subject access request within one month of receiving it. Normally, We aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date We receive your request. You will be kept fully informed of Our progress.

#### How Do I Contact You?

To contact Us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Rebecca Patrick):

Email address: [info@infinte-wellbeing.co.uk](mailto:info@infinte-wellbeing.co.uk)

Telephone number: 07435168707

Postal Address: Infinite Wellbeing C.I.C. 36 Ella Bank Road, Heanor, Derbyshire DE75 7HF [Changes to this Privacy Policy](#)

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if We change Our business in a way that affects personal data protection.

Any changes will be immediately posted on Our Site and stored in our Policy Folder and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site or upon reading the Policy following the alterations. We recommend that you check regularly to keep up-to-date.

### **Policy / Statement on working with Satellites & 3rd Party Partnership Arrangements (where applicable)**

Delivery may take place over all Infinite Wellbeing sites and offsite, e.g. a sports facility, work experience opportunity or educational trip.

Infinite Wellbeing staff will be present during any on or offsite delivery and will take the lead in most cases. Infinite Wellbeing staff will carry out all student assessments.

## **Assessment Planning: Procedure for delivery of required GLH and recording of assessment and related assessment plans**

All ASDAN qualifications follow the set Guided Learning hours as stated in the specifications. At Infinite Wellbeing we offer a number of different ASDAN qualifications within both KS3 and KS4. All qualifications and students accepted onto the course are discussed by the Alternative Curriculum staff and Deputy Head to ensure consistency and suitability.

Assessment plans are in the process of being written for the CoPE qualification. This is an ongoing process