



## **ANTERIOR Management Limited**

### **Quality Strategy and Policies**

#### **QUALITY ASSURANCE**

Each consultant has many years experience of managing work-based learning contracts within work-based learning providers, employers and colleges. The majority of consultants are also associate inspectors with Ofsted and previously the Adult Learning Inspectorate. The team of consultants used for each client is negotiated and agreed with the client at the start of the contract. Any changes to the project team during the contract are agreed with the client before additions or substitutions are made.

Each consultant is personally known to the Managing Director of ANTERIOR Management Limited and has worked with her on many occasions within a consultancy role or inspection role.

Each consultant has a call-off contract with ANTERIOR Management Limited. Each project a consultant works on is covered by a 'Letter of Engagement' which identifies the work required from the consultant. Each consultant is required to be covered for Professional Indemnity, Employer Liability and Public Liability with proof and currency held on file by ANTERIOR Management Limited. AML also holds Professional Indemnity, Employer Liability and Public Liability insurance.

All contracts are administered and monitored by the Managing Director of ANTERIOR Management Limited. Additional administration support is bought in when required.

Each consultant is required to produce a written report on the work they have done with each client. Each project is sent to ANTERIOR Management Limited where they are put into house style and checked by the Managing Director.

All work of ANTERIOR Management Limited is evaluated:

- Clients are asked to evaluate their work with ANTERIOR Management Limited
- Regular up-dates are supplied to NES Accounts Managers
- Training and workshops have a specific evaluation form
- A Project interim questionnaire or telephone survey is carried out
- Project reports are produced for NES

All correspondence and communication goes through ANTERIOR Management Limited.

#### **Complaints Procedure**

All complaints are handled personally by the Managing Director of ANTERIOR Management Limited unless the complaint is against her, in which case an independent

adjudicator is agreed with the client. All complaints are requested in writing. Written reports are gathered from all relevant personnel. The original complaint and the written reports are shared with the client's contract manager. The Managing Director or independent adjudicator, as appropriate given the nature of the complaint, chairs a meeting with all relevant parties having given them sufficient time to consider the relevant reports. The objective of the meeting is to find a resolution to the complaint that is acceptable to all parties. The complainant has the right of appeal if no resolution is found that is agreeable to the complainant. The appeal is to an independent adjudicator agreed by those present at the complaint hearing.

## Organisation chart

Two members of staff	Managing Director:	Anne Ashworth
	Company Secretary:	Dr Tim Smith
Conflict of interest	Dr Smith is an employee of the Learning and Skills Council and, as such, cannot and will not have any material involvement with any contract issued by the Learning and Skills Council.	

## Staff Recruitment and Training Policy

ANTERIOR Management Limited applies the principles of fair and open competition in its recruitment of staff. Vacancies are advertised locally or nationally as appropriate. The recruitment process is monitored for equality of opportunity.

All employees have a personal development plan, which is reviewed every six months and revised annually. All employees receive an annual appraisal.

Call-off consultants are recruited against a competency framework according to the company's need for specific expertise.

It is the undertaking of each call-off consultant to ensure that they have the necessary knowledge, qualifications, ability and expertise to perform the services to the standard of care and technical and professional expertise required by ANTERIOR Management Limited.

ANTERIOR Management Limited will ensure that consultants have access to relevant resources or will sign-post relevant resources to assist them.

Professional up-dating is the responsibility of each consultant and will be checked by ANTERIOR Management Limited.

ANTERIOR Management Limited also provides professional up-dating for consultants which might be in response to changes in Government policy, current initiatives within the FE System and appropriate to project requirements.

All new consultants working with ANTERIOR Management Limited are personally mentored by the Managing Director for a minimum of six months. Regular personal reviews are held with the consultant where they are given feedback on the quality of their work. This review also includes an element of client feedback.

This policy will be reviewed at least annually.



## **Quality Assurance Policy**

ANTERIOR Management Limited (the company) is dedicated to a policy that will ensure its services meet the requirements of its customers at all times. The company believes in the concept of customer and company working together in pursuing this policy and for continually striving for improvements in quality.

All the company's consultants must have a positive commitment to quality and respond quickly and effectively to achieve the performance standards required of them.

The quality policy is based on four fundamental principles:

- The definition of quality is conforming to requirements having carefully specified the needs of our customers, consultants and the company's own processes;
- The system of quality management concentrates on prevention, self-assessing the company's own processes, identifying the opportunities for error and taking action to eliminate them;
- The standard of quality is 'no failures' with all consultants understanding the standards required and doing it right first time;
- The measurement of quality is the cost of nonconformity and the eventual cost of getting it right.

The quality policy involves all consultants and the principles and objectives will be communicated as widely as possible. Practical assistance and training will be given, where necessary, to ensure the relevant knowledge and experience is acquired for successful implementation of the policy.

This policy will be reviewed at least annually



## **Health and Safety Policy**

The organisation is committed to and accepts its responsibilities in providing a safe and healthy working environment.

The Managing Director of ANTERIOR Management Ltd will always be current in practice and maintain Health and Safety qualifications (ISOH as a minimum qualification)

The organisation will continually screen legislation to ensure that obligations are fulfilled.

It is the policy of the organisation to conduct operations at any work place using all practicable and reasonable methods to ensure health and safety of employees and others who may be affected by our business.

This policy will be reviewed at least annually.

## **Equal Opportunities and Safeguarding Policy**

We are committed to being an equal opportunities organisation. We will not tolerate harassment or other unfair discrimination on grounds of sex, marital status, race, colour, nationality, ethnic origin, disability, age, religion or sexual orientation. We will promote the use of a range of flexible working partnerships to support the ethos of widening participation and life-long learning. We will treat people fairly and ensure that all materials reflect equality of opportunity in text, context and imagery.

We abide by all current legislation that promotes equality of opportunity, for example the Race Relations Act 1976, Sex Discrimination Acts 1975 and 1986, The Disability Discrimination Act 1995, the Rehabilitation of Offenders Act 1974, The Children Act 2004, Protection of Vulnerable Adults Act 2008 and subsequent amendments to these acts.

All consultants working with ANTERIOR Management Ltd will have current Criminal Record Bureau checks (CRBs) and be experienced in working with young people and vulnerable adults. Those consultants that are Associate Ofsted inspectors will have passed an NSPCC Child Protection on-line test.

This policy will be reviewed at least annually.



## **Environmental Policy**

ANTERIOR Management Limited recognises that our operations have an effect on the local, regional, national and global environment. As a consequence of this, its managers are committed to continuous improvements in environmental performance and the prevention of pollution. Environmental regulations, laws and codes of practice are regarded as setting the minimum standards of environmental performance.

The company seeks to address its impact on the environment through the adoption of a sustainable procurement policy. It conserves resources through efficient use and careful planning.

ANTERIOR Management Limited maintains that a primary part of its corporate environmental strategy is sustainable waste management and as such recognises its responsibilities to recycle materials wherever possible. The company minimises waste, especially hazardous waste and, whenever possible, recycle materials. It disposes of all waste through safe and responsible methods

The company works with its suppliers to ensure they recognise and reduce the environmental impact of their products, services and transportation. Public transport is recommended for all journeys whenever this is practicable.

ANTERIOR Management Limited implements its policies through guidelines and training.

This policy will be reviewed at least annually.

## **Data Security Policy**

### **Introduction:**

It is imperative for the company's survival that there is no breach in our data security, and also that we are seen to have appropriate policies and procedures in place.

This document is designed to inform our Directors, Employees and Customers of actions that must be taken to ensure a high level of security is maintained.

### **Compliance:**

ANTERIOR Management Limited will monitor compliance to the security policy and procedures, and any breach by a ANTERIOR Management Limited employee or sub-contractor will result in serious disciplinary action being taken, and dismissal without further warning will be considered.

### **Definitions:**

1. "Personal data" includes any data about Customers, Clients, Learners, Participants, Users, and any data about any individuals that could be considered to be "personal" or data which identifies details about an individual. For the purpose of this document, this includes any commercially sensitive data about companies and people.
2. "Anonymous Data" includes any data that has details such as ethnicity, disability, which could be used for statistical analysis or reporting purposes, but not including details that can enable the identification of individuals.

### **Policy and Procedures:**

3. General responsibilities:
  - a. All Directors, Employees and sub-contractors of ANTERIOR Management Limited are responsible for:
    - i. Keeping all Personal Data secure and for identifying any security risks.
    - ii. Being aware of the requirements for full compliance with the Data Protection Act laws, and for being aware of the need to comply with other Government and customer instructions with regard to data security.
  - b. Any new risk, once identified, shall be brought to the attention of colleagues and a Managing Director as soon as possible, and actions taken immediately to minimise the risk.
4. CRB disclosure:
  - a. All employees shall have a CRB "Enhanced" disclosure.

5. Password policy:

- a. All user accounts on ANTERIOR Management Limited computers must have secure passwords which comply with the following policy : must contain at least 8 digits, at least one capital, one small letter, one number and one special character such as ?\$%^& etc.
- b. Passwords are not to be sent by email (see Email policy below).

6. Data storage:

- a. Pen drives, CDs, DVDs, USB Drives and similar portable storage devices:
  - i. Pen drives, CDs, DVDs, USB drives and similar portable storage devices shall not be used to store Personal Data unless approved by the Client and the most appropriate storage medium.
- b. Laptops:
  - i. Processing personal data on laptops should be avoided if possible, but In the course of doing data analysis or data processing for customers, laptops may be used to process Personal Data where only the data required in order to perform the analysis has been downloaded. Once the analysis or processing task is complete, the data shall be permanently deleted from the Laptop, or the data shall be encrypted.
  - ii. All personal data stored on laptops shall be encrypted. All folders and all files containing personal data on a laptop shall be set to “encrypt contents to secure data” as defined in this Microsoft article <http://www.microsoft.com/windowsxp/using/security/learnmore/encryptdata.mspx>  
 (Note: for information, the above procedure means that if the laptop is stolen, any files remaining in the encrypted folders will not be available to be decrypted by any user without the full username and password details of the original laptop user).
  - iii. Laptops shall never be left in an unattended car, or any insecure location.
- c. Desktop personal computers:
  - i. Desktop personal computers shall only be used in the ANTERIOR Management Limited secure offices.



- ii. At the end of each project or task, all databases relating to that project shall be permanently removed from desktop computers.
  
- d. Training and presentations:
  - i. During the course of running training or presentations for customers, demonstrations may be carried out using customer's equipment, but personal data must not be saved on customer's hardware during training.
  
- 7. Wireless networks:
  - a. Wireless networks shall not be used in ANTERIOR Management Limited offices or on communications networks provided for working at home, for any electronic traffic regarding company emails.
  
- 8. Emails and security details:
  - a. Emails may be used to communicate URL and Username information but the information must be split into separate emails to maximise security, such as passwords for use of the ANTERIOR Virtual Learning Environment.
  - b. Passwords:
    - i. Where it is necessary to communicate a password, this shall be done via phone if possible.
  
- 9. Emails and transmission of Personal Data:
  - a. Personal Data should not be sent to customers by email.
  - b. If transfer of data by email is deemed the only way to resolve an issue, the data should be anonymised if possible, and must be encrypted using the .zip or .rar secure format. Passwords should be agreed by phone if possible, and under no circumstances should passwords and secure data be transmitted in the same email.
  
- 10. Firewalls and virus checking:
  - a. Each ANTERIOR Management Limited employee and sub-contractor shall maintain a software firewall and virus check on each machine used (Laptops, Desktop Computers, Virtual Servers etc) and each employee and sub-contractor is responsible for keeping all security systems current and updated daily.
  
- 11. Internet browsing, appropriate use the internet:

- a. ANTERIOR Management Limited provides access to the internet for work purposes only, plus casual browsing of generally accepted safe public websites only.
- b. ANTERIOR Management Limited will monitor all use of the internet including browsing history and email traffic, to ensure the maximum security of the company network.

12. Customer Education:

- a. ANTERIOR Management Directors, Employees and sub-contractors should encourage all customers to treat Personal Data security seriously by providing information at all appropriate times.
- b. Any ANTERIOR Management Limited employee or sub-contractor becoming aware of a breach of Personal Data security by a customer shall notify a ANTERIOR Management Limited Director as soon as possible, so that the implications can be discussed with the customer in an appropriate manner.
- c. Customers shall be advised of their responsibilities with regard to the security of Personal Data.

13. Mistakes:

- a. Any employee or sub-contractor realising that a mistake has been made regarding the security of Personal Data should bring that mistake to the attention of a Director as soon as possible, in order that all possible methods of protecting the Personal Data can be taken.

14. Frequency of Review:

- a. This policy and the procedures shall be reviewed at least every three months by The Company Board of Directors, and each update shall be circulated to, and re-signed by all employees and sub-contractors, to assist in ensuring that Data security remains a key priority for all staff.

