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FIRST AID SERVICES

IMS Governance and Organisational Manual

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Quality Policy Statement

We are committed to the continuing Policy of UFAS., which aims to provide a high quality, professional and efficient service to ensure the satisfaction of all the requirements of our clients. This achievement will result in securing efficiency, a strong customer focus and enhancement of long-term sustainability and profitability within the Organisation.

The Management Team will show leadership and commitment, and bear the responsibility for establishing, implementing, integrating, and maintaining the Quality Management System.

We undertake to ensure sufficient resources are made available within the Organisation to achieve this. We undertake to ensure through communication, engagement, practical example and training that Quality is the aim of all members of the Organisation.

Through direction and support, each employee will have a proper understanding of the importance of the Quality System function, their responsibility to contribute to its effectiveness, and its direct relevance to the success of the Organisation.

Equally, every employee is responsible for, and will be trained to perform, the duties required by their specific role.

The Organisation has a Policy of promoting continual improvement and setting of Quality Objectives in line with the framework laid down within ISO 9001:2015 Standard. These objectives will address the risks and opportunities within the Organisation as determined by Top Management.

We hereby certify that this Quality Manual and the Standard Operating Procedures Manual accurately describes the Quality System in use within the Organisation to meet the requirements of ISO 9001:2015.

The Quality System will be monitored, measured, evaluated, and enhanced regularly under the Top Management's ultimate responsibility, with regular reporting and communication of the status and effectiveness at all levels.

Signed by PJ Carroll – 10/06/2025



Health & Safety Policy Statement

In accordance with the *Safety, Health, and Welfare at Work Act 2005* it is the policy of the UFAS Limited to ensure, as far as is reasonably practicable, the safety, health, and welfare at work of all employees, volunteers, contractors, visitors and members of the public. It is a prime objective of the UFAS to promote the highest standards of health and safety across its operations.



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The UFAS is committed, in so far as is reasonably practicable, to:

- Implementing arrangements for the effective planning, organisation, control, monitoring and reviewing measures necessary for the control of risks and prevention of injury and ill health.
- Promoting standards of health, safety and welfare that comply with the provisions and requirements of the *Safety, Health and Welfare at Work Act 2005*, and other relevant legislation, standards, and codes of practice.
- Providing information, instruction, training, and supervision where necessary, to ensure its employees can perform their work safely and effectively.
- Ensuring adequate and effective systems for consultation and communication are established and maintained, including consulting with Safety Representatives on all matters related to safety, health, and welfare at work.
- Setting health and safety objectives annually based on the completion of the management review. Continually monitoring the progress of these objectives.
- Providing the necessary resources to ensure the safety of all those to whom it owes a duty of care, including employees, contractors, visitors etc.
- Maintaining a constant and continuing interest in health and safety matters pertinent to the activities of the UFAS.
- Continually improving the occupational health and safety risk management system and reviewing it periodically to ensure it remains relevant, appropriate, and effective.
- Staff will be consulted on matters relating to safety, health, and welfare through nominated Safety Representatives.

The Managing Director are committed to playing an active role in the implementation of the Health and Safety Policy and undertake to review and revise it in the light of changes in legislation, work practices, work environment, experience, and other relevant developments.

Please take some time to read and familiarise yourself with the content of this safety statement which should provide useful guidance to ensure you perform your duties in a health and safety conscious manner.

Signed by: PJ Carroll 10/062025

UFAS Safety Statement

See "UFAS SAFETY STATEMENT" document for details of the health & safety compliance documentation.

Sustainability Environmental Policy

Environmental & Sustainability Policy Statement

UFAS. is committed to the implementation of good environmental principles in-line with international best practice to protect the local, regional, and international environment. We strive to identify all aspects and impacts within the remit of the provision of the services offered and within the operations of the company. We are committed to continuous improvement in everything we do and have implemented several review processes to identify scope for improvement in each project. Our total management system is based on the principles of ISO 14001.



We have implemented processes, procedures and structures aimed at? continually improving our environmental performance on each project including:

- Commitment to comply with any relevant regulations, programmes agreed by government and best practices within the industry.
- Consider environmental impact when developing our Strategic Plan, project solutions for customers and working with partners on delivery projects.
- Implement best practice on Reuse, Reduce, recycle including working with clients to consider innovative ways to deliver projects while maintaining environmental awareness.
- Ensure all project partners (contractors) comply with UFAS. goals for environmental protection.
- Maintain relevant records as needed by the management system, legislation, and customer requirements. Make any key records available to interested parties as required in the interest of promoting sustainability.

The Directors are committed to playing an active role in the implementation of the Environmental Policy and undertake to review and revise it in the light of changes in legislation, work practices, work environment, customer satisfaction, experience, and other relevant developments.

Please take some time to read and familiarise yourself with the content of the environmental manual which should provide useful guidance in ensuring good environmental practices are implemented.

Signed by: PJ Carroll 10/06/2025

Information Security Policy Statement

Introduction

Information is a vital asset to any organisation, and this is especially so in a knowledge-driven organisation such as the UFAS, where information will relate to learning and teaching, administration and management.

This overarching policy document provides an overview of information security and lists a set of policy documents (sub-policies) which, taken together, constitute the Information Security Policy.

These policies are in place to ensure that information is appropriately secured against the adverse effects of failures in confidentiality, integrity, availability and compliance which would otherwise occur.



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Scope

This policy is concerned with the management and security of the organisation's information assets and the use of these assets by its members and others who may have been granted permission to process, store or otherwise handle organisation information on behalf of the organisation.

The documents in the Information Security Policy set apply to all members of the organisation and any others who may process information on behalf of the organisation.

Definitions

An information asset is defined to be an item or body of information, an information storage system or an information processing system which is of value to the organisation.

Policy Statement

Structure

The Information Security Policy document set is structured in accordance with the guidelines set out in the industry standard ISO 27001.

This top-level document lists a set of sub-policy documents which together constitute the Information Security Policy of the organisation. All of these documents are of equal standing. Although this policy set should be internally consistent, for the removal of any doubt, if any inconsistency is found between this overarching policy and any of the sub-policies, this overarching policy will take precedence.

Each of the sub-policy documents only contains high-level descriptions of requirements and principles. They do not, and are not intended to, include detailed descriptions of policy implementation. Such details will, where necessary, be supplied in the form of separate procedural documents and standards which will be referenced from the relevant, individual sub-policy documents.

Information Security Principles

The organisation has adopted the following principles, which underpin this policy:

Information will be protected in line with all relevant organisational policies and legislation, notably those relating to data protection, human rights and freedom of information.

Each information asset will have a nominated owner who will be assigned responsibility for defining the appropriate uses of the asset and ensuring that appropriate security measures are in place to protect the asset.

- Information will be made available solely to those who have a legitimate need for access.
- All information will be classified according to an appropriate level of security.
- The integrity of information will be maintained.
- It is the responsibility of all individuals who have been granted access to information to handle it appropriately in accordance with its classification.
- Information will be protected against unauthorised access.
- Compliance with the Information Security policy will be enforced.

Governance

Responsibility for the production, maintenance and communication of this top-level policy document and all sub-policy documents lies with Managing Director.

This top-level policy document has been approved by the Managing Director Responsibilities for the approval of all sub-policy documents.

Each of the documents constituting the Information Security Policy will be reviewed annually.

Signed by: PJ Carroll 10/06/2025

Data Protection Policy Statement

The Data Protections Act and General Data Protection Regulations describe how we collect, handle, and use personal information.

In the process of providing training courses, UFAS is required to collect, process, and retain personal details of learners solely for the purpose of certification. None of the personal information we gather is shared with or sold to external companies for marketing purposes.

As highlighted by the DPC checklist, as a general rule data must be retained for no longer than is necessary for the purpose for which it was collected in the first place. The Retention period reflects this, and this principle is highlighted to all Instructors/Staff & External Faculty in a general data guidance document.

A Retention Period for learner data is set at two years and one month i.e., the time period for duration of certification.

Under GDPR- Data Subjects have the following rights;

- the right to have data rectified or corrected
- the right to object to processing data
- the right to restrict the processing of data relating to them i.e., automation of decision making
- The right to move your data from one company to another
- to right to have data erased or deleted
- the right to access data
- the right to be forgotten

***Learners and Faculty are both data subjects who enjoy the same rights in respect of their data and the same procedures should be followed e.g. notification of data breach, data portability, right to erasure or deletion. ***

Signed by: PJ Carroll 10/06/2025



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Privacy Policy Statement

We at UFAS are committed to protecting and respecting your privacy. This Privacy Policy explains how we collect, use, process, and disclose your information, including personal data, and your rights in relation to this data under the General Data Protection Regulation (GDPR).



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Information We Collect

- We may collect and process the following types of personal data:
- Personal Identification Information: Name, email address, phone number, address, etc.
- Technical Data: IP address, browser type, operating system, etc.
- Usage Data: Information about how you use our website, products, and services.
- Marketing and Communications Data: Preferences in receiving marketing materials and communications from us.

How We Collect Your Data

- We collect data in the following ways:
- Direct interactions: When you fill out forms, contact us, or subscribe to our services.
- Automated technologies or interactions: As you interact with our website, we may automatically collect technical data using cookies and other similar technologies.
- Third-party sources: We may receive data about you from third parties, such as analytics providers and advertising networks.

How We Use Your Personal Data

- We will use your personal data only for the following purposes:
- To provide and maintain our services.
- To manage your account.
- To notify you of changes to our services.
- To allow participation in interactive features of our services.
- To provide customer support.
- To gather analysis or valuable information to improve our services.
- To monitor the usage of our services.
- To detect, prevent, and address technical issues.

Legal Basis for Processing

- Under the GDPR, we rely on one or more of the following lawful grounds for processing your data:
- Consent: You have given clear consent for us to process your personal data for a specific purpose.
- Contract: Processing your data is necessary for a contract we have with you or because you have asked us to take specific steps before entering into a contract.
- Legal Obligation: We are required by law to process your data.
- Legitimate Interest: Processing your data is necessary for our legitimate interests (e.g., improving our services), provided that your interests and fundamental rights do not override these.

Data Sharing

- We may share your personal data with third parties in the following situations:
- Service Providers: We may share your information with third-party vendors who provide services on our behalf, such as hosting services, IT support, and analytics services.
- Legal Requirements: We may disclose your personal data to comply with a legal obligation or in response to valid requests by public authorities (e.g., a court or government agency).

International Transfers

- If we transfer your personal data outside the European Economic Area (EEA), we ensure it is protected by:
- Ensuring that the country of the recipient offers an adequate level of data protection.
- Using contracts approved by the European Commission that give personal data the same protection it has in Europe.

Data Retention

- We will retain your personal data only for as long as is necessary for the purposes set out in this Privacy Policy. When the data is no longer required, we will securely delete or anonymize it.

Your Data Protection Rights

- Under the GDPR, you have the following rights regarding your personal data:
- Right to access: You have the right to request copies of your personal data.
- Right to rectification: You have the right to request correction of any inaccurate data.
- Right to erasure: You have the right to request the deletion of your data, under certain conditions.
- Right to restrict processing: You have the right to request a restriction on the processing of your personal data.
- Right to data portability: You have the right to request the transfer of your data to another organization or to yourself.
- Right to object: You have the right to object to our processing of your personal data under certain conditions.
- Right to withdraw consent: Where consent is the legal basis for processing, you can withdraw consent at any time.
- If you wish to exercise any of these rights, please contact us at [email address].

Data Security

- We have implemented appropriate technical and organizational measures to protect your personal data from unauthorized access, use, disclosure, alteration, or destruction.

Cookies

- We use cookies to enhance your experience on our website. You can set your browser to refuse cookies or alert you when cookies are being sent. For more information, please refer to our Cookie Policy.

Changes to this Privacy Policy

- We may update this Privacy Policy from time to time. We will notify you of any changes by updating the "Effective Date" at the top of this Privacy Policy.

Contact Us

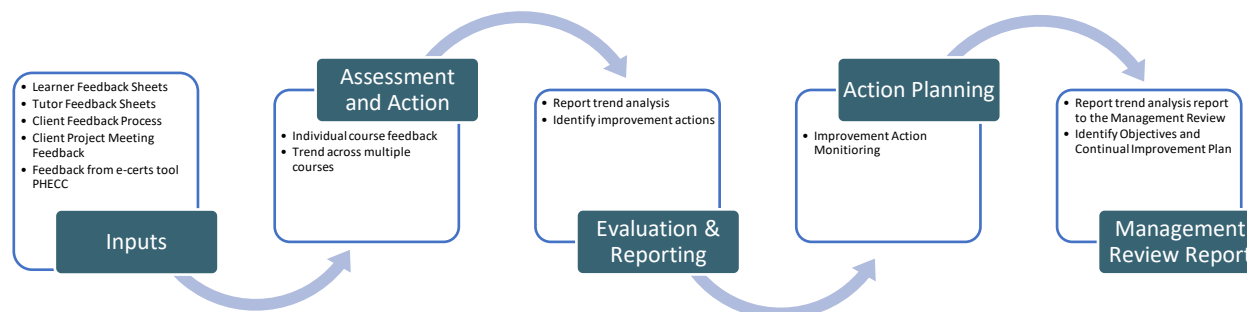
- If you have any questions or concerns about this Privacy Policy or how we handle your personal data, please contact us at:
- Email: info@ufas.ie
- Telephone: +353 (0)1 6991126

Signed by: PJ Carroll on 10/06/2025

Operational Policies

Customer Focus and Customer Feedback Policy

Customer feedback is an ongoing process which will include learner feedback, client feedback and client meeting minutes. The feedback will be compiled and shared with the management to continually improve the business operations.



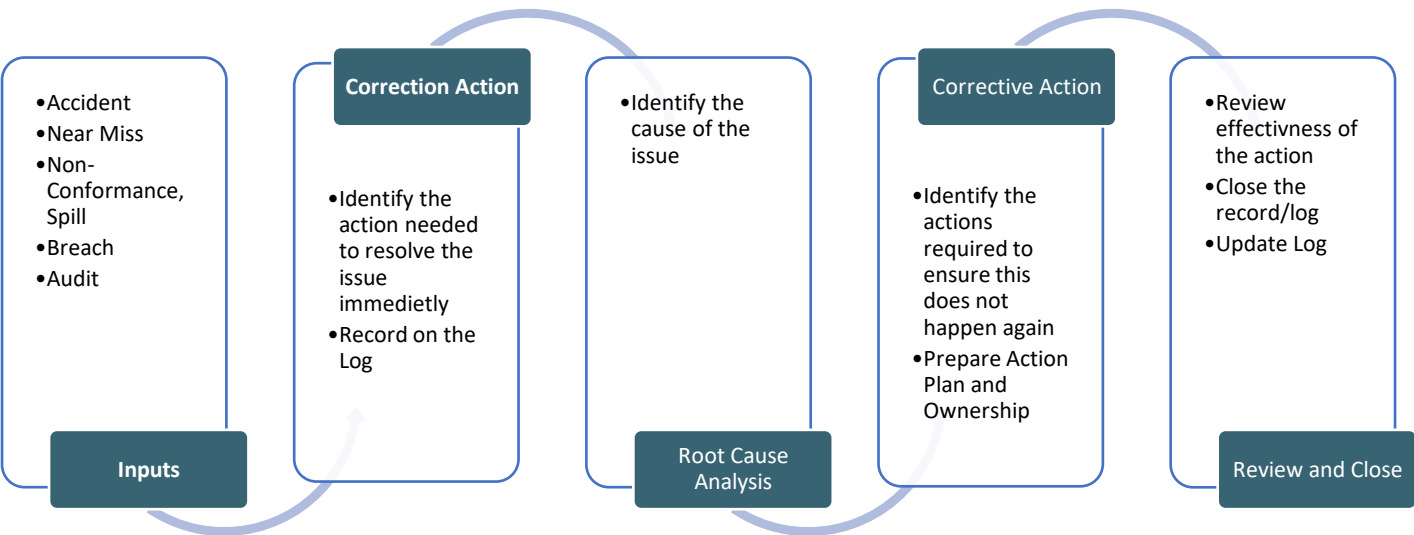
Procedure

Feedback will be sought from all learners at the end of a training programme, where possible this will be voluntary and anonymous to support valuable open feedback. The feedback where possible will be captured within the Application, LMS or CRM to provide trend analysis allowing the organisation to report on overall and tutor level performance/feedback.

The tutor will provide feedback through the directors report and other course feedback sheet ensuring the performance of the training course is captured and reported allowing analysis and assessment.

Feedback for each course will be reviewed as part of the internal verification (IV) assessment, any remediation action will be identified and recorded within the IV report.

Non-Conformances, Accidents, Incidents and Near misses Policy and Procedure
Purpose Map



Procedure

All non-conformances, accidents, incidents, breaches and near misses will be recorded in the Non-Conformance Log or the external verifier report and reported to the Management Review Meeting. The Log is used as the record for the recording and actioning all non-conformances, conduct investigation and record Correction and Corrective action

Non-Conformance Log



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Date Logged	Type of non-Conformance Accident, Incident, Near Miss, Quality NC, Breach	Detailed of the non-conformance	Correction Action (immediate)	Root Cause Analysis	Action Plan (prevent reoccurrence)	Effectiveness and Close



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Children and Vulnerable Persons Safety Policy & Procedures

At UFAS, the safety and well-being of children, young adults and vulnerable persons participating in our training programs is of paramount importance.

We are committed to ensuring a secure and supportive environment that uphold their protection and welfare. Under the Child and Vulnerable Person Act 2012, a child is defined as an individual under the age of 18 and a vulnerable person includes those with conditions limiting their capacity to protect themselves from exploitation or abuse.

This policy outlines our measures to safeguard children and vulnerable persons during their engagement with our services.

Under the child and vulnerable person act 2012, a child is a person under the age of 18 and a vulnerable person means either a person who has a condition which is of a nature as to severely restrict the capacity of the person to guard themselves against serious exploitation or abuse, physical or sexual by another person or to report such exploitation or abuse to Gardaí or relevant authorities.

Vulnerable persons may be generally understood to encompass individuals who may be more susceptible to harm due to factors such as age, disability, mental health conditions, illness, dependency or other vulnerabilities.

The Child and Vulnerable Persons Act creates offences for withholding of information on certain offences against Children and Vulnerable Persons under S.2 & S.3 of the act. The offence is committed where a person knows or believes an offence has been committed and has information that they know or believe to be of material assistance in the apprehension, prosecution or conviction of a person who has committed an offence and fails without reasonable excuse to disclose that information to the Gardaí.

Following guidance by the Data Protection Guidance on fundamentals re minors and young persons- data related to minors shall be afforded special protection, are able to exercise data rights in the same manner as adults, data rights of young persons may be exercised on behalf of the young person with sufficient capacity and the rights of the minor shall be considered. Rights may be exercised by parent/guardians and 3rd parties.

Procedures

While there is no minimum age requirement for participation in PHECC courses, we recommend 16 as an appropriate age for satisfactory course completion. We accommodate requests for learners under 18 considering their best interests and safety.

Instructors and staff selection is in line with the policy. All instructors and Staff, including external faculty, undergo thorough screening. Instructors with prior convictions will not be engaged and any attempt to apply or affiliate may require disclosure.

As the GNIB have confirmed- UFAS is unable to apply for the facility of Garda Vetting. Consequently, where Instructors have vetting through a voluntary organisation this should be recorded but should not be relied upon solely. Vetting from such organisations shall be considered on an individual basis.

Our instructors and affiliates are required to adhere to the requirement of the Children First Act 2016. All Instructors and affiliates are required to complete the HSE Children First Course and provide evidence of same.

For Learners under 18- an accompanying individual such as a teacher, teaching assistant, parent/guardian or a vetted person are required to attend the training session. Information regarding children and vulnerable persons is discussed with clients at initial contact.

In cases where training is provided in premises such as creches, care facilities, schools or centres where minors and/or vulnerable persons are present, Clients are required to provide a vetted individual to attend. If vetting is not possible, a statutory declaration may be completed by the Instructor confirming that they have not been convicted or under investigation for any relevant offence. Consent to this request by a client should not be withheld by an Instructor.

Instructors cannot conduct training or examinations on a one-to-one basis with a course attendee including vulnerable persons, learners and staff members. All activities shall be conducted in a group setting or in the presence of a school representative, teacher or staff member for the protection of all parties.

Under the Child and Vulnerable Persons Act, disclosing information against children and vulnerable persons is mandatory. If any staff member, instructor or external faculty has knowledge of an offence, it must be reported to the Gardaí. The duty to disclose arises irrespective of when the offence was committed and should be carried out without delay.

If there are concerns about disclosing information, the Director should be informed and external advice may be sought if required. This obligation to report overrides any personal or professional concerns.

At all times, the interests of the Child and/or Vulnerable person is the primary importance and not the interests of UFAS or any other RI/ATI.

For Data Protection – the rights of the young person shall be treated in the same manner as that of an adult. In accordance with DPC guidance, young persons shall not be treated unfavourably due to their age and GDPR regulations. In light of the special protection- no direct marketing shall be conducted by FAC to young persons.

Guidance Note during post incident notifications/actions:

Consideration should be taken in the case of any incident (Tusla (April 2025 Addendum))

- Mandated Persons must consider whether the person alleged to have abused the adult may still pose a current risk to children.
- If there is any possibility of ongoing risk, a Mandated Report to Tusla is required.
- Mandated Persons are expected to engage in a reasonable inquiry (not an investigation) to determine if the alleged perpetrator has access to children now.
- Reporting is not automatic; it is based on risk to current children, not solely the disclosure of past abuse.

Unconscious Bias - Equality & Diversity Policy for Instructors, Staff and Affiliates

As instructors at UFAS, it is crucial to create a fair and inclusive learning environment for all members of the public. Unconscious biases can unintentionally influence our interactions and teaching practices.

This guidance document provides practical tips to help instructors at UFAS avoid unconscious bias when teaching members of the public. This should be read in line with the policy on Equality & Diversity and Bullying & Harassment.

This Guidance is prepared as an additional resource for UFAS Staff/ Independent Instructors & External Faculty.

- **Reflect on Personal Biases:** Take time to identify and acknowledge your own biases. Being self-aware is essential in minimizing their influence on your teaching.
- **Lifelong Learning:** Stay informed about different biases and stereotypes, and commit to continuous personal development.
- **Fairness and Respect:** Ensure that every learner is treated with equal respect and dignity, regardless of their background, gender, ethnicity, or any other characteristic.
- **Individual Evaluation:** Assess learners based on their unique merits, skills, and performance, avoiding assumptions or generalizations.
- **Avoid Stereotypes:** Be mindful of language that perpetuates stereotypes or assumptions about specific groups. Treat each learner as an individual with distinct abilities and potential.
- **Gender-Neutral Language:** Use gender-neutral language whenever possible to create an inclusive and welcoming learning environment.
- **Encourage Active Participation:** Create a safe space where all learners feel comfortable contributing their thoughts and ideas. Encourage individuals from diverse backgrounds to actively engage.
- **Manage Group Dynamics:** Ensure that no one is excluded and facilitate discussions that respect different perspectives and experiences.
- **Embrace Representation:** Incorporate where possible diverse examples, case studies, and resources that reflect the experiences and achievements of individuals from various backgrounds.
- **Inclusive Learning Materials:** Ensure that course materials, visuals, and examples are unbiased, avoiding stereotypes and assumptions.
- **Reflect and Adapt:** Regularly reflect on your teaching practices, seek input from colleagues or supervisors, and adapt your approach to foster a more inclusive learning environment.

Gender Expression & Gender Identity Policy for Instructors, Staff and Affiliates

This policy should be read in conjunction with UFAS Respectful Workplace Policy.

In line with the commitment to providing a training environment for all attendees, UFAS seeks to ensure that the dignity & integrity of all Service Users, Staff, third parties and relevant parties are respected by creating an inclusive working and Learning environment.

The policy applies to all parties including (Please note this list is non-exhaustive);

- Learners
- Visitors
- Subcontractors
- Instructors & Service Providers

- Suppliers & 3rd Parties
- Former clients, learners & staff

UFAS undertakes to respect the identity and experiences of all persons, regardless of their gender and biological sex. UFAS Staff/ Instructors shall provide services to all parties, regardless of their gender identity fairly and without bias/ prejudice or discrimination. The use of pejorative language towards any Learner, colleague or third party will not be tolerated. Where such incidents occur, outside of UFAS premises, these should be reported to the client and or the client's named contact.

This policy applies to individuals who identify as; Non-binary Transitioning Intersex Transgender Transexual

Gender identity refers to a person's innate, deeply felt psychological identification as male or female, which may or may not correspond to the person's body or designated sex at birth. Gender Expression refers to the external characteristics and/or characteristics considered to be masculine or feminine such as dress, manners of speech, social interactions and personal grooming.

Where a Learner has expressed a desire to be referred to by the pronoun (they/them) to UFAS staff and/or Instructors, this direction should be followed according to the wishes of the individual without objection or discussion on principle.

The overall guiding principle for Staff, Learners and Instructors is to ensure that the issues of gender and gender identity is treated with sensitivity and respect for the Individual is of paramount importance.

In line with this principle, Learners and Staff records should be updated and reflect the identity of the Individual as expressed to UFAS. The confidentiality of all learners should be respected and kept up to date. Harassment and/or discriminatory conduct is prohibited and reported instances shall be investigated and may result in

- Dismissal for Employees
- Removal from named faculty
- Immediate cancellation of any contract for services with UFAS

Where an individual provides UFAS or UFAS faculty with a gender recognition certificate, this should only be requested where necessary i.e. recognition of prior learning or to meet the requirements of the accreditation or public body.

The trans status of an Individual should be considered confidential and should only be disclosed on a need-to-know basis, and only with the consent of the Learner, Client, Faculty member. Staff or 3rd party.



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UFAS is committed to the provision of equal opportunities for our people and our learners.

This policy applied to all including Management, Independent Contractors, External Affiliates, and Relevant 3rd parties

Definitions Bullying is defined as repeated inappropriate behaviour, direct or indirect, which is verbal, physical or otherwise that undermines an individual's right to dignity at work. Examples of bullying include ridicule, belittling, hostility (such as exclusion), finding inappropriate faults and intimidating gestures.

Harassment, excluding sexual harassment, refer to any conduct related to discriminatory grounds covered by Employment Equality Acts 1998-2015, such as discrimination, membership of the Travelling Community, race, religion, age, gender, marital status, family status or disability. Harassment can involve acts, requests, spoken words, gestures, display or circulation of words, pictures or other materials. Harassment may arise from a single incident or a series of incidents of inappropriate behaviour.

Sexual harassment is any form of unwanted verbal, non-verbal or physical conduct of a sexual nature that violates the dignity of another and creates an intimidating, hostile, degrading, humiliating or offensive environment. Examples of sexual harassment include physical contact (e.g., touching, tickling) verbal contact such as teasing and suggestive comments and non-verbal contact such as the display of explicit material, suggestive gestures, unwanted derogatory comments including comments regarding the individual's appearance. This definition is not exhaustive, and these behaviours may also apply to same sex interactions.

Procedures:

All our team, affiliates and Learners are expected to maintain a working environment that respects the dignity of every individual. Parties who witness harassment or bullying are required to address and report such behaviour as inappropriate, irrespective of the intention of the alleged offender. The concern is the impact of the behaviour in question and not the intention of the individual.

All parties are expected to maintain a working environment that respects the dignity of every individual. Parties who witness harassment or bullying are required to address and report these instances. The appropriate contact is the Company Director. Any form of bullying or harassment in the termination of an instructor's contract or client business contract if a learner engages in such behaviour. Version 4 May 2023

A separate document outlining the expected behaviour of Learners is provided to learners in advance of their course.

Induction training is provided to Trainers and Affiliates to ensure all parties understand the nature of their responsibilities

Additional guidance relating to social media and gender identity & expression is available to Instructors and Affiliates.

Complaint form is available for completion by the Complainant and shall be actioned by the Director. Completion of this form is not mandatory, and complaints will be actioned however communicated.

Anonymous complaints will be noted but may prove challenging to investigate and may impede appropriate investigation. Details of any such complaint will be shared on a need-to-know basis.

Where a complaint relates to instructors and affiliates, the complainant and respondent shall be kept separately and contact between the parties of any kind should be avoided.

We will correspond with legal representatives for both Respondent and Complainant to protect the interests of all parties.

All complaints shall be considered considering the principles of fairness, transparency, and impartiality.

Complaints may go through the following stages: informal investigation, formal investigation, proposed resolution and external escalation.

Informal investigation includes discussing the complaint informally with both parties, identifying the needs of the parties, exploring possible resolution with the parties and facilitating dialogue between the parties where appropriate.

Formal investigation includes full formal investigation, taking written accounts from parties and witness, interviewing others for background, considering the materials and impact of the alleged conduct and referrals to External Advisors.

Where a complaint is escalated externally- all details shall be provided to the respective parties and/or their representatives.

Complaints may be upheld, not upheld, unresolved or withdrawn. Remedies for resolution may be identified by the Director and determined based on the context of the complaint.

Equality and Respect in the workplace complaint form

Completion of this form is not mandatory – complaints may be investigated on foot of verbal, email or any method of communication

For Security Reasons details on this record may be redacted by the Director and amended for language.

Please be aware anonymous complaints are frequently challenging to investigate- we ask you to provide your details which will be held in the strictest confidence Nature of Complaint Bullying, harassment, sexual harassment.



Equality and Respect in the workplace complaint form			
Date Received		Completed by	
Reported to		Witness if Any	
Date and Time of the Issue/Incident		Location of the Issue/Incident	
Outline of the Complaint (Please provide as much information as possible) physical, verbal, gesture)			
Investigation Respondent informed Actions Internally and Externally			
Evaluation and Response Date		Signed	

Data Protection Policy and Procedures



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Outline of the GDPR procedures

Aim of this Policy

The purpose of this policy is to outline how Data is collected, manage potential breach, manage risk, and protect the data of Learners, Faculty, and all related parties.

Purpose:

The purpose of the Data Protection Policy is to ensure;

1. Compliance with the Data Protection Acts and GDPR
2. Protect the rights of Learners/Clients and other stakeholders
3. Prevent and protect against Data Breaches
4. To ensure Transparency
5. Follow good Practice

Responsibilities related to this Policy.

The owner of this document is the Managing Director who is responsible for ensuring compliance across the organisation.

Outline of the Data Maintained

Learner Personal Data	• Name • Address/Company Name • Phone number/ Email address • Details of Prior Learning where applicable Emails are secured on secure servers and cloud storage accessible through UFAS PC/Laptops. Learner Emails are utilised for registration of the Learners e-learning accounts are collected and inputted to the online platform for the purpose of facilitating Learner access. Emails will be deleted 30 days following full course completion.
Storage of data	• Digital copies are stored on our secure servers and cloud storage and certificate generating databases. • Learner data on the LMS for Blended Learning shall be kept for 30 days after full course completion • Learner data shall be kept on the LMS platform for an initial 60 day to allow time for completion of the e-learning component online asynchronous component and in class synchronous training. • LMS generated reports shall be kept to evidence e-learning online completion and shall ensure that only necessary information is kept for

	the purposes of monitoring and record keeping. LMS user reports are retained for 60 days Record of online completion certificate shall be kept for 2 years and one month i.e. the time period for duration of certification In line with DPC guidance, data should be minimized, collected for a specific purpose, and kept for no longer than necessary.
Retention period	Learner details and certification are stored for two years plus one month. - LMS generated reports shall be kept to evidence e-learning online completion and shall ensure that only necessary information is kept for the purposes of monitoring and record keeping for 60 days. - Record of online completion certificate shall be kept for 2 years and one month i.e. the time period for duration of certification
Consent for contact	Contact preferences are recorded on Course paperwork. Consent for creation of an e-learning account is obtained prior to user registration and consent is provided through affirmative action as per introductory email. Consent is also recorded on the course booking form and course paperwork.
External Faculty/Staff and other 3 rd parties	- Name - Address/Company Name - Phone number/ Email address - Instructor Certification and ID numbers - Insurance Certification & Confirmation of tax Certification
Storage of data	- Digital copies are stored on our secure server for the length of the relationship. - Once the contractual relationship or employment relationship concludes, the data shall be deleted
Retention period	Instructor details will be reviewed and updated periodically to ensure Valid Certification, tax and insurance are in place. Out of date information will be deleted and updated as required. All information will be deleted upon conclusion of the relationship.

Consent for contact	Consent is freely given by the data subject and requires affirmative action. A joint data controller agreement is in place with external faculty. For External Faculty- Consent should be obtained from the Learner for their data to be processed for the purposes of Certification. No collaborative provision is in place for e-learning program.
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Information gathered by phone will be recorded digitally and handwritten notes destroyed by shredders as soon as practicable. Data which is stored on programs such as Sage for invoicing persons will consist only of the Name, Address, email, and date of training and shall be kept for no longer than necessary i.e. six years as per CRO and statute of limitation for contract.

Data Security- Password Protection

All Data is protected by strong password protection on all UFAS devices and kept away from visitors and external parties in a locked office area for additional security. These passwords are not shared between staff and instructors. Specific equipment is allocated for the administration of the LMS which has limited access.

Data held for Learners who undertake blended learning shall, in line with Data Protection Guidance, be held no longer than is necessary. Learner access to their e-learning account shall remain active for 60 days after e-learning course completion. After this time, all learner data stored on the platform will be deleted and records updated to reflect completion of the e-learning asynchronous and in class synchronous FAR training. Learner records are updated to confirm completion of online component and Practical date. Certificates of Completion are retained for a period of 2 years and one month following full course completion.

LMS generated progress reports shall be generated weekly and saved to evidence completion, such reports may be abridged with unnecessary data deleted to avoid excessive data collection.

LMS users shall set their own access passwords. LMS users are not required to provide UFAS with their unique user password, password requests shall be facilitated through the LMS. Where progress checks for Learners are required at any interval UFAS shall generate a report to check progress and delete any data which is unnecessary for the purpose required. LMS user reports are retained for 60 days.

Data Subject Access Requests

UFAS will ensure that when a subject access request is received, the request should be processed as soon as possible. Any request should be acknowledged within 1 working day and the request should be complied with by 30 days. If there is a delay in processing the request, the reason for the delay should be communicated to the Data Subject and regular updates provided.

If a data subject makes a request, which is not clear in terms of the data requested, we will confirm the request with the data subject request. We will confirm how we will search and the scope of the information that we hold to make sure that both the data subject and we are in agreement.

We will not refuse a request unless the request is excessive or manifestly unfounded (where multiple or repetitive requests are made). In the unlikely event that this occurs, we will advise that they can refer or complain to the Data Protection Commissioner and will follow their recommendations or directions in a timely manner.

An administrative charge for copies of personal data shall not be any more than the minimum €6.35

Information deletion

Where a request for deletion of data is received, we will confirm the steps taken to erase the information by us. The right of erasure or deletion will not apply where processing is needed because of the right of freedom of expression or because of a legal or public interest.

Portability of Data

UFAS will ensure that we do not place any barriers to exercise of the right to portability. If a request is received to transfer data, we will confirm the personal data that is held and confirm that how should the data be moved from UFAS to the proposed recipient. This request will be complied with if;

1. We have the consent of the data subject or
2. We had a contract with them
3. The request is limited to the data relating to the data subject only
4. The request should not prejudice the rights of third parties

Data Access/ Data object to processing

UFAS has a privacy and GDPR policy available on their website. Learners have the right to access the information may hold for them. An access form is available for use to facilitate access. In line with the GDPR and Data Protection Act- UFAS will ensure there is no barrier to access. Consent is sought for direct marketing purposes, where a Data Subject objects to the processing of their data, all communications for Direct marketing purposes will cease immediately and any specific query will be addressed with the Data Subject.

Data Protection Breach_

A breach is defined as the intentional or unintentional release, possible or unauthorized disclosure of personal data however that happens. Where a breach is suspected or detected; The breach must be reported to the Managing Director who has responsibility for Data Protection.

Details of the breach will be compiled including;

- Date and time of the breach
- Date and time of suspected breach
- Description of the breach
- Details of any IT systems provided

Where a breach is suspected, steps should be taken to minimize and limit the breach of information.

Steps should be taken to identify the risks arising from the breach and consider the potential adverse consequences for an individual. As much information as possible should be sought and the Data Protection Commissioner office should be notified regarding the breach of personal data. Notification should take place as soon as possible but no later than 72 hours.

Where an incident arises which gives rise to unauthorized disclosure, loss, destruction, or alteration of personal data in any form- UFAS will give immediate consideration to informing those affected. This will allow the data subject to consider the consequences for them and to take appropriate measure.

We will also contact organizations that may be in a position or assist in protecting the data subject including the Gardai. In instances where the breach is likely to result in a considerable risk to an individual, or individuals UFAS must tell the data subjects without undue delay of;

- The nature of the breach in clear language
- Name and contact details of the designated contact
- Likely consequences of the breach
- Measures taken or proposed to remedy

Any recommendations or directions from the Data Protection Commissioner must be complied with in a timely fashion and all requests for information from the DPC should be communicated promptly and in accordance with their directed timescales.

A Data Breach form is available for all relevant parties.

Data Amendment/Rectification

Where data is incorrect or requires updating- the request for amendment should be actioned immediately to reflect the information provided and confirmed with the Data Subject. While we have prepared standard forms and precedent letters for Data Subjects, there is no obligation on the subject to use them, when making a request.

Relevant Forms

We have prepared standard forms and precedent letters for Data Subjects but there is no obligation on the Subject to complete specific forms should they wish not to. UFAS should not create obstacles to the Individual exercising their rights. A request through any contact method should be actioned and responded to.

Duplication

As per the legislation, duplication of records should be avoided and where duplication is found, duplicates should be deleted.

Transparency

Details of the rights to privacy and GDPR is available on the website for access. A Data Protection policy is available for Learners, Staff and Instructors and is accessible.

A DPO is not required for UFAS but the MD has been named as the designated contact for Data Protection issues. UFAS has clear procedures and designated personnel in the instance of queries or

breach. The designated contact is aware of the need to contact the DPC. Guidance and procedures are in place for external faculty.

Data Protection Impact Assessments (DPIAs)

The e-learning program is a new initiative assessment. In accordance with DPC guidance based on GDPR regulations, UFAS will conduct DPIAs for implementing new processes and monitor the operation of the LMS platform for any risk to learner data. Such assessments shall be conducted a minimum of every six months or earlier where required. The Responsibility for conducting DPIA's is with the Managing Director.

Joint Data Controller Agreement

A joint data controller agreement is currently in place and the definition expanded to include data collected, processed, and managed for the purposes of e-learning.

Guidance and procedures are in place for all Staff & faculty.

Things to consider for all Staff/Instructors/External Faculty;

- Do we need this information?
- Do we know why we are collecting this data?
- How long do we need this data for?
- Will the Individual understand why we are holding this?
- Is the information up to date and relevant?
- Should this information be deleted- is it necessary?
- Is there more than one record of this information- if so, delete the duplicated records?
- Do you understand the implications of Data Breach, and do you know what to do? This policy is binding on all Instructors/Staff/ External Faculty.

Appendix 1 Forms

UFAS First Aid Training Services Data Protection Breach incident report

This form should be used in the event of a breach or suspected breach.

Data Subjects should not be referenced by name in this form.

This file should be kept confidential

Compiled by Contact Details



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Data Protection Breach Form			
Date of Incident		Noticed by	
Reported to		Date Incident reported	
No. of Persons affected		No. of Persons affected	
Type of breach			
Notification to Actions taken to mitigate			
Evaluation and Response Date		Signed	

UFAS First Aid Training Services Data Protection Access Request Form_

You have the right to access and receive a copy of the personal information we hold about you.

Please complete this form in order for us to comply with this request.

Information relating to third parties or exempt under the law will not be released. In order to comply with this- we will need proof of identity.



UFAS First Aid Training Services Data Protection Access Request Form_			
Full Name		Address	
Contact details		Are you an instructor	
When did you work with us		When did you work with us last	
Are you a client or a Learner		What Course and date did you attend	
Did your employer arrange training (please provide details)			
Do you have an agent/representative appointed			
Please provide details			
Would you like your data in hard copy or digital form			
Address to send your data- if different from home address			
We promise to make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification, please note that this time may be extended to 3 months when necessary, considering the complexity and size of your request			
Signed		Date	

UFAS First Aid Training Services Request for Further Information Date:

To: (Data Subject)

Your Data Protection request

Dear Sir/Madam (Name if preferred)

We have received your request to exercise your right to (data protection right) dated and received by us on (date). However, to determine if this request is valid, we require further information from you.

(Identification) Please provide a copy of your passport or driving license or other form of official identification so that we can confirm your identity. This is a legal requirement to ensure that we do not comply with a request about you from someone else.

(Clarification) We require further information about the precise details of your request.

Please do not hesitate to contact us if you have any queries about the progress of your request.

Signature _____

Date _____



UFAS First Aid Training Services Acknowledgment of Rights Request Date:

To: Subject: your data protection request

Dear (named person)

We have received your request to exercise your right to (right) dated (insert date).

We aim to respond to this request within 1 calendar month, but please note that this time may be extended to three months, when necessary, considering the complexity of your request.

Please do not hesitate to contact us if you have any queries about the progress of your request.

Signature _____

Date _____



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UFAS First Aid Training Services Refusal of Right Request Date:



To: Subject: Your Data Protection Request

Dear Sir/Madam,

We have received your request to exercise your right to (right) dated (insert date). Unfortunately, we are unable to comply with your request for the following reasons;

(Set out the reasons for the refusal)

Please do not hesitate to contact me if you have any further questions about the reasons given.

Please note that you also have the right to contact the Data Protection Commission. Please find the contact details for the Data Protection Commission below.

Signature _____

Date _____

Data Protection Commission Canal House,
Station Road,
Portarlinton,
Laois.
R32 AP23
0761 104 800 Lo call: 1890 25 22 31
info@dataprotection.ie

UFAS First Aid Training Services Objection to Processing form

This form is designed to allow you to exercise your right to object to the processing of your personal data under applicable data protection laws.



Please complete this form for us to comply with this request.

To comply with this- we will need proof of identity

UFAS First Aid Training Services Data Protection Access Request Form			
Full Name		Address	
Contact details		Are you an Instructor/Faculty member	
When did you work with us		When did you work with us last	
Are you a Learner		What Course and date did you attend and date	
Did your employer arrange for your training and if so, who is your employer			
Do you have an agent/representative appointed			
Please provide details			
Please specify the reasons for your objection to the processing of your personal data Please provide as much details as possible Do you wish to withdraw any previously given consent for the processing of your personal Data (yes/no)			
We promise to make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification, please note that this time may be extended to 3 months when necessary, considering the complexity and size of your request			
Signed		Date	

UFAS First Aid Training Services Completion of Rights Request Date:

To:

Subject: Your Data Protection Request

Dear Sir/Madam,



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We have now implemented your request to exercise your right to (right) dated (insert date). We have prepared the following report to provide details of how this has been carried out.

We hope this satisfies your request to exercise your rights. Please do not hesitate to contact me if you have any further questions about this matter.

Please note that you also have the right to contact the Data Protection Commission. Please find the contact details for the Data Protection Commission below.

Signature _____

Date _____

Data Protection Commission Canal House,
Station Road,
Portarlinton,
Laois. R32 AP23
0761 104 800
Lo call: 1890 25 22 31
info@dataprotection.ie

UFAS First Aid Training Services Letter of Delayed Request



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Date:

To:

Subject: Your Data Protection Request

Dear (Named Person),

We have now implemented your request to exercise your right to (right) dated (insert date) and expect to respond to this request by (date). The reason for the delay is (provide reason).

We appreciate your understanding as we work to progress this request.

Please do not hesitate to contact me if you have any further questions about this matter.

Please note that you also have the right to contact the Data Protection Commission. Please find the contact details for the Data Protection Commission below.

Signature _____

Date _____

Data Protection Commission Canal House,
Station Road, Portarlinton,
Laois. R32 AP23
0761 104 800
Lo call: 1890 25 22 31
info@dataprotection.ie

UFAS First Aid Training Services Access Request Form



You have the right to portability of your information.

Please complete this form for us to comply with this request.

Information relating to third parties or exempt under law will not be released.

To comply with this- we will need proof of identity

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UFAS First Aid Training Services Access Request Form			
Full Name		Address and contact details	
Are you a Faculty Member / Learner		What course did you attend	
When did you last work for us		What date did you attend	
Do you have an agent/representative appointed Please provide their contact details			
What information would you like to port Please provide as much information as you can			
Names of Companies and their contact details that we should send your information to;			
WE promise to make every effort to respond to you within 1 calendar month of the receipt of your request and valid identification, please note that this time may be extended to 3 months when necessary, considering the complexity and size of your request			
Signature		Date	

Whistleblower Policy (Protected Disclosure Policy)



Introduction

UFAS is committed to maintaining the highest standards of honesty, openness and accountability and does not believe that it is in anyone's interests for those with knowledge of wrongdoing not to come forward. UFAS takes all malpractice very seriously. Persons making genuine, supported, material allegations should be assured that their concerns will be treated seriously and sensitively. UFAS will provide reasonable support to all persons making genuine, supported, material allegations and will aim to protect them from detriment, provided that at all times the person making the allegation has acted in good faith and that the allegations made are material and properly grounded.

Policy Statement

In implementing protected disclosure legislation, UFAS's policy is:

- To encourage staff to raise reasonable concerns regarding possible wrongdoing in the workplace.
- To assess/ investigate disclosures in a thorough, competent and timely manner.
- To take reasonable steps to ensure that penalisation does not arise in the case of a discloser, provided the disclosure was made based on a reasonable belief. This includes investigation of claims of penalisation and consideration of disciplinary action where warranted.
- To treat seriously cases where staff make allegations of wrongdoing under the Act without a reasonable belief that the wrongdoing occurred. The protections of the Act may not apply to such staff and they may be subject to disciplinary action if, for example, an allegation of wrongdoing was known to be untrue or misleading or was frivolous or vexatious.
- To deal with allegations made against individuals having due regard for the principles of natural justice and fair procedures which may include a right to challenge the evidence against him/ her.

Purpose

This Policy outlines UFAS's policy for dealing with disclosures by stakeholders/persons who have a reasonable belief that wrongdoing has occurred and/ or is ongoing i.e. protected disclosures. This policy sets out to outline the procedures for raising concerns about or reporting possible improprieties, malpractice, or illegal activities in The UFAS.

This policy is not intended to replace the normal handling of issues which takes place in the ordinary course of business. UFAS's policies in relation to grievances, bullying, harassment, disciplinary matters and other complaints are the appropriate procedures to use where an employee feels there are grievances, injustices or discrimination etc. Therefore, these issues would be outside the scope of this policy and should be addressed through those appropriate channels.

The disclosure of a wrongdoing does not confer any protection or immunity on a staff member in terms of his/ her involvement in that wrongdoing.

Objectives

To provide a culture where employees will feel confident in raising concerns about possible improprieties and/or malpractices or illegal activities occurring in UFAS and to encourage Satkeholders to raise concerns about or report improprieties occurring in The UFAS without fear of reprisal.

Roles and Responsibilities

- Overall responsibility for implementing legislation, policies and guidance pertaining to protected disclosures rests with the CEO and Board of Trustees who are supported by Designated Persons (DPs).
- Within UFAS, DPs are the Quality and Compliance Officer and HR Manager who will have responsibility for assessing disclosures, determining if they are protected disclosures, leading investigations and/or referring cases to relevant management or authorities where applicable.

Definitions

Protected Disclosures Act 2014

The Protected Disclosures Act 2014 ('the Act') provides a statutory framework within which staff can raise concerns regarding potential wrongdoing that has come to their attention in the workplace. The Act provides staff members who contend that they have been penalised for making a report of possible wrongdoing with access to significant protections and scope for securing redress. UFAS is committed to fostering an appropriate environment for addressing concerns relating to potential wrongdoing in the workplace and to providing the necessary support for staff who raise genuine concerns.

What is a Protected Disclosure?

A protected disclosure is a disclosure of information which, in the '*reasonable belief*' of the staff member, tends to show one or more relevant wrongdoings. The wrongdoing must come to the staff member's attention in connection with his or her employment and should be disclosed as outlined in the procedure. The Act is intended to deal with disclosures in the public interest and for connected purposes. This normally involves wrongdoings that are likely to cause harm to the UFAS itself or to the public at large, as opposed to personal complaints.

'Reasonable belief'

The term "reasonable belief" means that the belief that a wrongdoing has occurred is based on reasonable grounds. This does not mean that the belief has to be correct. A staff member has the right to be wrong in his/her reasonable belief.

The motivation of the staff member for making a disclosure is irrelevant in determining if it is a protected disclosure under the Act. The disclosure will be assessed on the basis of how a reasonable person would respond to the information available to him or her at the time that the disclosure was made.

'Relevant wrongdoing'

The definition of 'relevant wrongdoing' includes:

- Criminal offences;

- Failure to comply with legal obligations;
- Miscarriages of justice;
- Health and safety matters;
- Environmental damage;
- Unlawful or improper use of funds or resources of a public body;
- An act or omission by or on behalf of a public body which is oppressive, discriminatory, grossly negligent or constitutes gross mismanagement;
- Concealment or destruction of information relating to any of the foregoing.

‘In connection with their employment’

The information must come to the attention of the staff member in connection with their employment. A matter is not a relevant wrongdoing if it is a matter which it is the function of the staff member or the staff member’s employer to detect, investigate or prosecute and does not consist of or involve an act or omission on the part of the employer.

Exclusions

What type of Disclosure is not covered by this Policy and Guidance?

It is to be expected that concerns which relate to day-to-day operational matters will in the normal course of events, be brought to the attention of the relevant line manager and dealt with accordingly.

Personal concerns, for example, regarding an individual’s own terms and conditions of employment or bullying/harassment claims, would not be regarded as protected disclosures and would be more appropriately processed under the Dignity at Work Policy and Grievance Procedure

Anonymous Reporting

UFAS will accept anonymous disclosures, and they will be acted upon to the extent that this is possible, given the constraints in obtaining further information when it is received anonymously.

However, the protections available under the Act and other elements of the protected disclosures procedure (e.g. keeping the discloser informed) cannot in those circumstances be accessed by a staff member who makes an anonymous disclosure unless the staff member is prepared to dispense with anonymity.

Procedure for Whistleblowing

- In the normal course of events, a worker who has concerns about improprieties, malpractice or illegal activities that are/could affect the health and welfare of clients, service users, other Workers or visitors to UFAS should report their concerns to the designated person within UFAS. The designated person within UFAS is the **Operations Manager** However, if you believe that the designated person is involved, you should approach the Chief Executive Officer.
- It is preferable that all concerns are put in writing and sent to ProtectedDisclosures@UFAS.ie, stating the reason for the concern and if appropriate any actions that have already been taken

to address the concern. Concerns that are being raised should be reported using the form attached in appendix.

- The designated person will acknowledge the report, in writing, within a period of 7 days of their receiving same. Following this, the designated person will investigate the report as deemed necessary.
- The Designated Person will provide a response to the report within a period of three months outlining the actions which have been taken, or are planned to be taken, on foot of the report.
- If the worker is unhappy with the outcome following this report, they may raise the issue externally as per the Act.
- Workers' identities will be treated as confidential unless the identity of the person providing the information is required to properly investigate any concerns. Where the concern cannot be investigated without revealing the identity of the worker raising the concern, the person whom you reported the issue will discuss the options available and agree on how to proceed.
- While anonymous reports will be given consideration, it is more difficult for UFAS to carry out an investigation of an anonymous report.
- Any employee who raises a concern in good faith and on reasonable grounds will not suffer any form of retribution because of raising their concerns even if it is found to be mistaken. However, where an employee raises a matter which they know to be misleading, false or which is reckless or frivolous will be subject to disciplinary action.