Festina Lente Enterprises CLG
Quality Assurance Manual

The charity that supports people to achieve their personal best in the natural world of horses, horticulture, and community

Section 1. Introduction and Context

Introduction

Festina Lente Enterprises CLG was founded in 1988 to support people to achieve their personal best through their experiences with horses, horticulture, and community. Regardless of personal circumstances, Festina Lente staff are enthusiastic about ensuring that this mission can be realised by each person and are proud to be able to collaborate with each person in achieving this.

Festina Lente Enterprises CLG Mission

Our mission is to provide a unique range of equestrian and horticultural learning, training and employment opportunities that focuses on social inclusion, choice, and personal development.

Festina Lente Enterprises CLG Vision Statement

Our vision is to create a welcoming environment where we can deliver customised learning and training programmes that promote employment opportunities and empowers our students to achieve their full personal and vocational potential. We believe in creating a safe space that nurtures and recognises the unique talents of each individual empowering them to be the best they can be.

Statement of Purpose

Festina Lente Enterprises CLG provides a range of equestrian, horticultural, community-based learning, leisure, training, recreational, and employment services to people affected by socio-economic disadvantage and/or disability. All our activities conform to either the standards for Rehabilitation Training and Adult Day Services as set out by the Health Services Executive (HSE), Social Enterprises as set out by the Department of Rural and Community Development or as a Specialist Training provided as set out by the Department of Education and Skills. The Equestrian Learning Centre management conforms to standards as set out by the Association of Irish Riding Establishments (AIRE) and our equestrian activities conform to all other relevant and statutory requirements.

Legal & Charitable Status

Festina Lente Enterprises CLG is a company limited by guarantee. It is regulated by the Charity Regulatory Authority (C.R.A.), registered Charity No. 20061425. It is registered with the Companies Registration Office (C.R.O.) Company Number:364369 and VAT registered with the Revenue Commissioners Vat Number IE6384369A. For copies of supporting document, articles of association and company constitution available on request from info@festinalente.ie

History of Festina Lente Enterprises CLG

Festina Lente Enterprises CLG was set up in 1988 to provide equestrian and horticultural vocational training to young school leavers with an intellectual disability. Originally based in the Spruce Lodge Equestrian Centre in Kilternan, Co Dublin, the programme operated with a team of six staff and ten students. In 1996, the organisation relocated to Old Connaught Avenue, Bray, Co Wicklow through the support of EU Horizon funding with the intention to provide employment to people with a disability through a social enterprise model. The two additional programmes were to establish a) the development of an Inner-City Farm concept and b) a Riding School. At this point, staff numbers increased to twelve and student numbers increased to sixteen. A relocation of all services is planned for 2025/2026.

Expansion of services

Between 2001 and the present day, there has been considerable expansion of the services including the development of a wide range of equine based therapeutic and educational programmes, Health Services Executive (HSE) funded Rehabilitative Training and Adult Day Services and Pobal supported Social Enterprise of the Equestrian Centre and the Walled Garden. At time of publication, Festina Lente Enterprises CLG employs 66 staff (38 full time and 28 part time) plus 4 seasonal casual staff.

Festina Lente Enterprises CLG Values:

Welcoming

We are open to everyone and welcome without exception each person who comes to us

Dignity

We treat everyone with dignity irrespective of his or her background or abilities

Progressive

Our staff strive try to ensure that the services provided meet the highest international standards

Dedication

Our staff are dedicated to responding to individual needs and provide excellent services for those who need us

Ethical Horse Welfare

Horses are key to our success. Their well-being is a priority both during and after their working lives

Charity Governance Policy

Festina Lente Enterprises CLG has completed the compliance checklist process as determined by the Charities Regulatory Authority (CRA) to comply with the principles and practices of the Charities Governance Code. The Governance Code for Community Voluntary and Charity organisations in Ireland. This process is completed annually and was last completed on 15th November 2024Festina Lente Enterprises CLG prepares financial statements in full compliance with Charities Statement of Reporting Practice (SORP) under FRS102. The Financial Reporting Standard applicable in The Republic of Ireland. Our accounts are published annually on our website. As part of our service level agreements with Government bodies, we complete and submit monthly and bi-annually claims and report annually on objectives set. We are also subject to on-site visits and assessments from our funding agencies. We welcome these meetings as it ensures that our systems are fully compliant and maintain excellence in service delivery for our clients and funders alike.

National and International Recognition

Festina Lente Enterprises CLG has become not only a national leader but an international leader in the field of equine assisted programmes. In addition, Festina Lente Enterprises CLG contributes both nationally and internationally to the on-going discourse regarding the benefit of equine assisted activities and social and therapeutic horticulture. Festina Lente Enterprises CLG regularly hosts undergraduates' students studying social care, psychology, etc., via the Erasmus Programme who have identified Festina Lente Enterprises

CLG as an effective model which demonstrates success in promoting the physical, mental, psycho-social, and social well-being for children, young people and adults through equine assisted and programmes and social and therapeutic horticulture.

Who uses Festina Lente services?

In its broadest description, the beneficiaries of Festina Lente Enterprises CLG include individuals and families from all facets and backgrounds of society - children, young people, teenagers, and adults affected by disability and/or socio-economic disadvantage. More specifically, beneficiaries include cchildren, young people, teenagers, and adults with a broad range of disabilities including:

- Autism
- Intellectual disability
- Mental health difficulties
- Dual Diagnosis
- Physical disability
- complex needs
- Young children and teenagers attending schools located in areas of socio-economic disadvantage presenting with social, emotional, and behavioural difficulties
- Early school leavers

Structure and funding

Festina Lente Enterprises CLG receives funding from the following sources:

- Health Services Executive (HSE)
- Department of Community and Rural Affairs through the offices of Pobal
- Kildare and Wicklow Education and Training Board (KWETB)
- Traded Income
- Donations and Grants

Evolution of Festina Lente Enterprises CLG Quality Assurance Policies and Procedures

The first edition of the Festina Lente Enterprises CLG Quality Assurance Policy Document was published in 2009 and was updated in line with the re-engagement process with Quality and Qualifications Ireland 2023. This current version was reviewed and redeveloped in 2024.

Festina Lente Enterprises CLG QQI Programmes

The following QQI accredited educational courses are provided:

- Transition Training Programme Q.Q.I. Programme code PG10127 Level 3

  Award: Major Award in General Learning 3M0874 (funded by the H.S.E.)

- Horsemanship K.W.E.T.B. Level 4

  Award: Horsemanship Award (validated and funded by K.W.E.T.B.)

  Note: Festina Lente is the 2nd Provider – for this course we adhere to the K.W.E.T.B. Specialist Training Provision Operating Guidelines

- Life and Workplace Coaching Q.Q.I. Programme code PG21153

  Award: Level 6 Special Purpose Award 6S3153

- Therapeutic Coaching Q.Q.I. Programme code QQI PG15152

  Award: Level 6 Component Award 6N1975/ 6N3087/ 6N1949

Festina Lente Quality System Flowchart

FESTINA LENTE QUALITY ASSURANCE SYSTEM
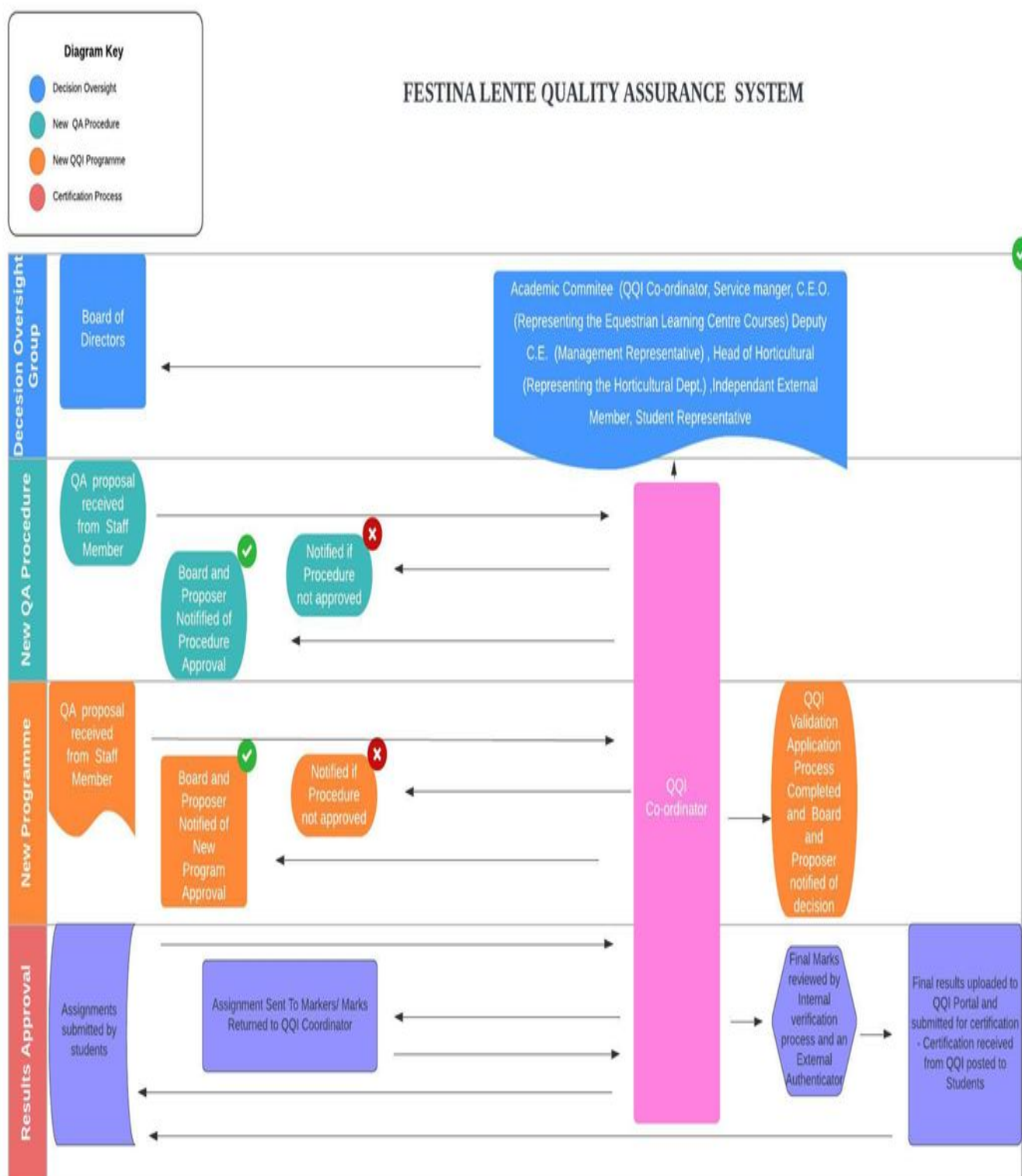
1. Governance and Management of Quality

Festina Lente Enterprises CLG is committed to delivering training programmes in line with Quality and Qualifications Ireland (QQI) core statutory guidelines. The QQI Quality Assurance Manual describes how the Quality Management System ensures that all policies and procedures comply with QQI core and sector guidelines and how the control of these requirements is appropriate and regularly maintained.

The policy of Festina Lente Enterprises CLG is to ensure a high level of quality in all areas of its training operation, including programme content and development, student assessment, student retention and placement, student relations, student-tutor relations, staff management, administrative procedures, and facilities management.

In each of these areas, procedures have been developed for quality of delivery and processes and have allowed for assessment of the outcomes of those procedures. There is a strong commitment by the Festina Lente Enterprises CLG's Board of Directors, the Academic Committee, and all staff to deliver these training programmes to the highest standards possible and in line with continuous improvement principles, which will improve the effectiveness of the Quality Management System. Festina Lente Enterprises CLG is committed to ensuring that its Q.A. policies, procedures, practices, and guidelines continue to reflect and follow all prevailing legislation as it evolves. This Quality Assurance Manual (QAM) will be reviewed on an annual basis or as needed.

Festina Lente Enterprises CLG has a comprehensive set of human resource and financial procedures, complies with all relevant legislative requirements, and has adopted the Code of Practice for Good Governance of Community, Voluntary and Charitable Organisations in Ireland https://www.governancecode.ie/. Festina Lente Enterprises CLG also has a comprehensive policy on fundraising in line with the Charity Regulator Authority' Guidelines for Charitable organisations on Fundraising from the Public.

PDF Link: https://www.charitiesregulator.ie/media/o5ul004d/guidance-for-fundraising-english.pdf

Click to view Policy/Procedure/s: Fundraising Policy

1.1 Governance Structure

1.1.1 The Board of Directors

The Board of Directors are responsible for the oversight of the governance of Festina Lente Enterprises CLG. The Board takes on a leadership role in the organisation, ensuring that the charity remains focused on its long-term vision and has the resources to meet its goals. The board has a responsibility to support and oversee the management, staff and volunteers involved in the charity. They also must ensure that the organisation meets its legal obligations and that its finances are professionally managed. The board ensures that the charity operates in a transparent and fair way.

Each voluntary board member has been recruited based on their specific skill set, background and expertise which includes:

- Finance
- Equestrianism
- Marketing
- Organisational Development
- Law
- Social Care
- Governance and Compliance

Click to view Policy/Procedure/s: 1.1 Board of Directors: Terms of Reference:

1.1.2 Chief Executive Officer

Reports to: Board of Directors

The Chief Executive Officer is responsible for ensuring that the Festina Lente Enterprises CLG strategic plan is planned, delivered, and evaluated in a professional, transparent, and organised manner in line with all stakeholders' needs and expectations and relevant legislative requirements.

Key Responsibilities:

- Overseeing the operational management of Festina Lente Enterprises CLG
- Determining budget allocations and making resource and capital investment decisions up to a maximum approved by the Board of Directors
- Managing human resource issues, including the provision of staff development
- Overseeing the marketing of the of Festina Lente Enterprises CLG
- Considering any matters referred to it, as appropriate, by other authorities / individuals within Festina Lente Enterprises CLG

1.1.3 Management Team

The Festina Lente Enterprises CLG Management team comprises the Chief Executive Officer and five Managers with responsibility for

- HR Management/ Assistant C.E.
- Financial Management
- Day Services (H.S.E. & Pobal) Management
- Equestrian Learning Center Management
- ~~Walled~~ Horticulture and Garden Retail Management

Departmental Managers have specific skills and expertise relative to their area but additionally actively contribute to the organisational strategic development.

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                        Board of Directors
                               |
                              CEO
          ┌────────────┬────────┼────────┬────────────┐
   Assistant CE/    Financial   Day Service  Equestrian    Head of
   & H.R. Manager   Controller   Manager   Learning Centre Horticulture
                                            Manager       and Retail
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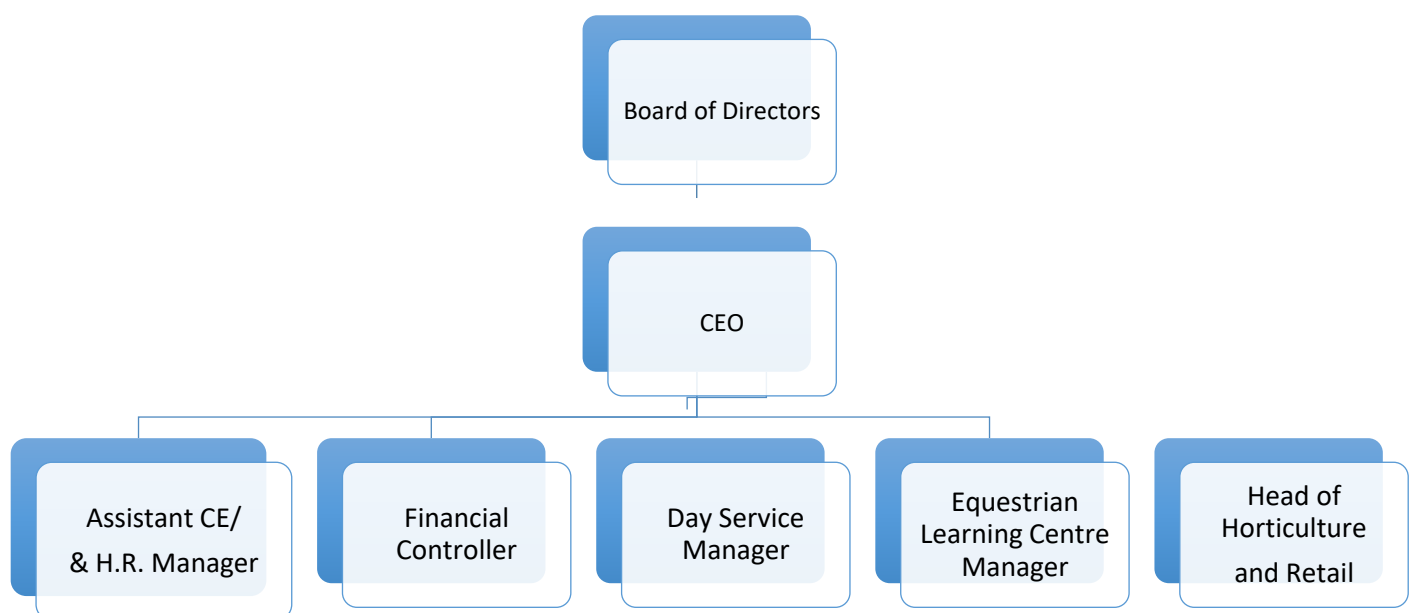
1 Management Structure

1.1.4 Academic Committee

The purpose of the academic committee is to maintain the academic standards and quality relating to education, learning, training, and assessment in the context of the identified the needs/requirements of our learners, internal and external assessment, QQI accreditation and certification, regulatory and legislative bodies whilst maintaining a clear separation between the academic and the commercial elements of Festina Lente Enterprises CLG.

Click to view Policy/Procedure/s: 1.2 The Role of the Academic Committee Policy

1.2 Management of Quality Assurance

1.2.1 Academic Committee Terms of Reference

The key areas of responsibility of the academic committee are:

- To oversee the development, maintenance and compliance of the academic-related policies and procedures in the Quality Assurance Manual.
- To monitor the implementation of new academic policy and procedures, maintenance of standards, and administration of the programs, including staffing, teaching, etc.
- To conduct an annual review of learner enrolment, retention, completion, and progression. The current enrolment numbers for the KWETB funded Equestrian Training Programme will be documented quarterly at the Academic Committee meeting.
- To complete an annual review of academic resources.
- To review students, post course and module feedback surveys identifying areas for action, development and implement appropriate change. Formative and summative learner feedback is reviewed by the academic committee and programme staff.
- To review all tutor job specifications in advance of advertising,

The academic committee includes as part of its remit a dual role as a results approval panel and will review and approve assessment results including:

- Review all internal verification and external authentication reports. To ensure recommendations are implemented to continuously improve programme delivery and development.
- Agree to the submission to QQI of final results and requests for certification.
- Identify any issues arising in relation to the results and make recommendations for corrective action.
- Planning, management, and operational oversight of the Level 3 Transition Training Programme QQI PG10127, Level 4 K.W.E.T.B. Horsemanship programme, Level 6 Life and Workplace Coaching QQI PG21153 and the Level 6 Therapeutic coaching programme QQI PG15152 programmes.
- Ensuring that the academic policies relating to teaching and learning are adhered to. To consider the need to revise, develop or alter courses in the light of prevailing circumstances, and to prepare appropriate proposals. To review annually the operation of the academic programs and consider proposals for their enhancement.
- Monitoring the design, development, and implementation of new programmes of study in accordance with the functions of Festina Lente Enterprises CLG.
- To approve internal markers and external authenticator nominations.

- To acknowledge and review suggestions, reports and recommendations received from staff members and third parties.
- To review quarterly the profile of learners to ensure that there continues to be a compatibility between programme aims and learners' needs. There is an annual review of the number of learners who commence and complete each training programme and where training is not completed, reasons why are reviewed and recorded.

1.2.2   Operating Procedures of the Academic committee

The Academic Committee will meet quarterly or whenever otherwise necessary and records will be kept in adherence with GDPR guidelines. Minutes are taken for each meeting and circulated among all those in attendance. A voting quorum of three people is needed to ratify any decisions made by the committee.

- The Academic Committee will produce an annual report detailing the work of the committee during the year.
- The Academic Committee will meet with the student council every 3 months who will be supported by an independent staff member. Festina Lente operates a student council for those learners of the level 3 Transition Training Programme QQI PG10127 & Level 4 K.W.E.T.B. Horsemanship programmes. This group meets every 6 weeks and is facilitated by an independent staff member. Given the small group size of the Level 6 Life and Workplace Coaching QQI PG21153 and the Level 6 Therapeutic coaching programme QQI PG15152 programmes and the 10-month duration of the Programme with six modules every 3 months -a student council model is not considered appropriate.
- The committee will annually review the Festina Lente Enterprises CLG strategic plan.

1.2.3 The membership of the Academic Committee

consists of the following roles:

1. **Chairperson: Training Coordinator:** This role is filled by the current Training Coordinator. The chair is responsible for the leadership of the committee. As chair of its meetings, they are responsible for ensuring that the business of the committee is conducted efficiently and effectively. The Chair should ensure that the committee exercises collective responsibility that decisions are taken corporately by all members acting as a body. The Chair will encourage all members to work together effectively, contributing their skills and expertise as appropriate, and will seek to build consensus among them.

2. **Horticultural Programme Head**: The current course Horticultural course tutor.

3. **Equestrian Programme Head**: The current course Equestrian course tutor. Noted: As this member is also our C.E.O. they cannot vote on any learner assessment-related matters.

4. **Tutor Representative**: The current K.W.E.T.B. Equestrian Training Programme Instructor.

5. **Services Program Head**: The current Day Services Manager.

6. **Senior Management Representative**: The current Assistant Chief Executive.

7. **Student representative**- Rotational representative from the services courses level 3 Transition Training Programme PG10127 & K.W.E.T.B. Level 4 Horsemanship programme.

8. **External representative/Consultant**: This role will be filled by a non-employee with no prior relationship to the organisation for a minimum of 5 years. The minimum expertise/qualifications of such a representative are a third level degree and at least 2 years' experience collaborating with people with Intellectual and or physical disabilities and experience delivering and assessing QQI courses. Details of our current external consultant available upon request via email from Trainingadmin@festinalente.ie.

1.2.4 Separation of Academic Committee from daily Management flowchart

Separation of Academic and Management Chart

The Academic Committee:
- has ultimate responsibility for all academic affairs and protects, maintains, and develops academic standards
- is responsible for the maintenance, implementation and ongoing review and enhancement of the internal QA system, policies, procedures, and wider QA activities and oversees self-evaluation and monitoring of programmes as well as programme development activities
- ensures that the validity, authenticity, and reliability of the programme assessment process
- considers applications for learner appeals and decides on actions and outcomes

The Board of Directors provides strategic direction for the company

The Management Team is responsible for the day-to-day management of the company, staff, and various service objectives.

2 Separation of Academic and management

1.3 Risk Assessment

Festina Lente Enterprises CLG has a system of governance that considers risk - Our Risk Register ensures that We are not engaged in activities or partnerships that might undermine the integrity of the education and training offered or the awards in the National Framework of Qualifications, either in Ireland or abroad.

Click to view Policy/Procedure/s: 1.3 Risk Assessment

Click to View Academic Risk Register: Festina Lente Enterprises CLG Risk Register/s

1.4 Embedding a Quality Culture
Festina Lente ensures a culture of quality across the Organisation.

Click to view Policy/Procedure/s:

1.4 Organisational Culture

20

2. Documented Approach to Quality Assurance

All the planning and operational functions take place within a quality assurance framework. Quality assurance procedures and overarching institutional assessment and functioning are themselves subject to an ongoing monitoring process.

2.1 Documented Policies and Procedures

Quality assurance policies, procedures and compliance are the responsibility of the Academic Committee that has as part of its responsibility ensuring internal QA compliance. As part of the QQI institutional review, quality assurance procedures and policies are subject to a comprehensive review and revalidation procedure used for the various awarding bodies. This QA policy describes how Festina Lente Enterprises CLG ensures that the validity of all programme materials is maintained and describes the responsibilities of those who develop training materials and those who approve it.

This procedure includes those who approve:

- draft programmes prior to submission for validation
- learner results prior to submission for certification and
- Self-evaluation and Programme evaluation reports prior to submission.

These procedures refer to all QQI Certified programmes.

- Proposed training programmes are developed in line with QQI guidelines for preparing programme descriptors for Further Education and Training Programmes Leading to QQI CAS Awards (revised edition 2013).
- Proposed Training Programmes are discussed and agreed to by the Academic Committee and approved by the Board of Directors prior to submission to QQI for validation.
- The Academic Committee includes as part of its remit a dual role as a Results Approval Panel and will review and approve assessment results including:
  1. Review all Internal Verifications reports and External Authentication Reports
  2. Sign off on approved results.
  3. Agree to the submission to QQI of final results and request for certification.

4. Identify any issues arising in relation to the results and make recommendations for corrective action.

5. Self-evaluation and programme improvement reports are conducted in accordance with QQI Guidelines. Self-evaluations are conducted every three years and will include past and present learners, staff, employers, and other identified stakeholders. This evaluation will be conducted by an external person with expertise in evaluation studies and in the subject matter of the programme being evaluated. This policy will be approved by the Board of Directors and will be reviewed every two years after approval.

Click to view Policy/Procedure:

2.1 Documented Approach to Quality Assurance

2.2 A Comprehensive System

The Board of Directors delegates the development and management of quality management to the Chief Executive Officer and the Academic Committee. Monthly Board of Directors meeting reports will include QQI course related matters. An annual summary of the numbers of learners in each programme is recorded for the Level 6 Special Purpose Award Life and Workplace Coaching QQI PG21153, the Level 6 Therapeutic coaching programme QQI PG15152, the Level 3 Transition Training Programme QQI PG10127. As continuous intake applies for the Level 4 K.W.E.T.B. Horsemanship programme, this programme will be documented quarterly at each Academic Committee meeting.

Click to view Policy/Procedure: 2.2 Academic Committee Board meeting report procedure

Quarterly Academic Committee meetings review the profile of learners to ensure that there continues to be a compatibility between Programme aims and learners needs. The Academic Committee and Programme staff review formative and summative learner satisfaction rates. There is an annual review of the number of learners who commence and complete each training Programme and where training is not completed reasons why are reviewed and recorded. Level 4 K.W.E.T.B. Horsemanship programme is reviewed quarterly.

2.3 Management of Festina Lente Quality Assurance Manual

Festina Lente' Quality Assurance Manual has been produced and developed by the Academic Committee the C.E.0, Services Manager, Training Coordinator, ETP Programme Facilitator, Transition Training Programme Facilitator, non-employee consultant and in consultation with relevant staff members. There is a procedure in place re: review and update of QA procedures and QA manual using a change log and update spreadsheet. The Q.A.M will be published Via SharePoint which will manage record version control by recording date/time and person who updated the Q.A.M.

Click to view Policy/Procedure: 2.3 Review of Quality Assurance procedures and version control

3. Programmes of Education and Training

3.1 Programme development and approval

Festina Lente Enterprises CLG is committed to the development of new programmes as new learning needs emerge and that they responsive to learners and market needs, can be adequately resourced and that they are developed in line with the National Framework of Qualifications (NFQ) and associated policies and procedures on Access, Transfer and Progression. In advance of new programme development, proposed training programmes are combination of community interest, consulting with key stakeholders and in-depth research of current national course delivery. It can also include the outcome of the course evaluations as they may identify future learning needs. All new courses include learning objectives, cost benefit analysis and course viability. Submissions are made to QQI detailing the course proposal, its proposed development and implementation. The Academic Committee is responsible for this process but will also include the Board of Directors for ultimate approval and sign off.

Click to view Policy/Procedure:

3 programme Development flowchart
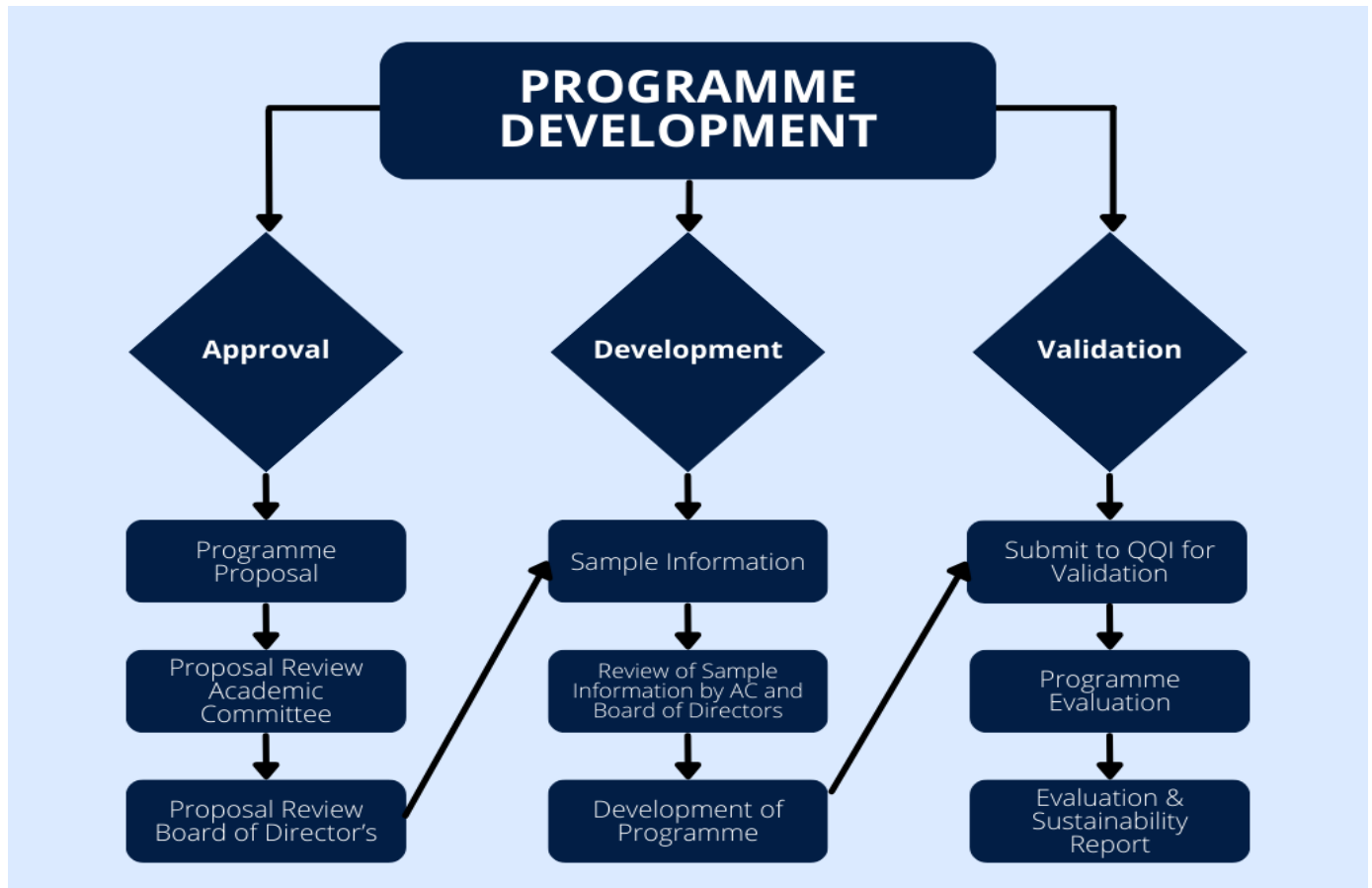
3.2 Learner admission, progression, and recognition

Festina Lente Enterprises CLG operates an open and transparent admission policy for all learning programmes. All applications are reviewed using a series of procedures that describe the procedures relating to learner admission, progression, recognition, and certification of awards. These policies and procedures are available on our website (www.Festinalente.ie) in our QA manual. Applications for the Level 3 Transition Training Programme QQI PG10127 & Level 4 K.W.E.T.B. Horsemanship programme involve a week of orientation to allow the applicants to gain a practical insight into the programmes. Applicants for the Level 6 Life and Workplace Coaching QQI PG21153 and the Level 6 Therapeutic coaching programme QQI PG15152 apply on –line via our website (www.Festinalente.ie). Where there is a need for further clarification from either party Re: Level 6 Life and Workplace Coaching QQI PG21153 and the Level 6 Therapeutic coaching programme QQI PG15152 a follow-up phone call and or interview will apply. Responsibilities for admissions are with the Training coordinator, Course facilitators/Instructors, and the Academic Committee. Course admission is further detailed in 2.1 Course Admission Procedures. Applicants are required to advise on the online application form if English is there first language. If English is not there first language an interview and example of written work will be required.

Click to view Policy/Procedures:

3.2.1   Learner Admission/ Induction

The induction period for Level 3 Transition Training Programme QQI PG10127 & Level 4 K.W.E.T.B. Horsemanship programme takes place over many weeks or months – depending on the cognitive ability of the learner. Induction time for the Level 6 Life and Workplace Coaching QQI PG21153 and the Level 6 Therapeutic coaching programme QQI PG15152 programmes is conducted over the first three days. Main responsibility for induction is with each Key Worker and Course Tutor for Levels 3,4 and 6, respectively.

Click to view Policy/Procedures:

3.2.2   Induction Level 3 & 4 Programmes
3.2.3   Induction Level 6 Programmes

3.2.4   Learner Progression

Learner progression and completion is measured in a number of ways and depending on the programmes. Within the Level 3 Transition Training Programme QQI PG10127 and Level 4 K.W.E.T.B. Horsemanship programme progression rates are reviewed regularly at staff meetings. Learner progression and completion is measured by a) the submission of assignments within the time limits for assignment submission and b) the marks awarded to each learner. Where assignments are continuously submitted late and /or learner continuously fails, a meeting is held with the learners. Where appropriate and relevant, recognition of non-formal and informal work is taken into consideration for all programmes. For students in the Level 3 Transition Training Programme QQI PG10127. Learners take the next steps in the final year of their programmes and is a highly individualised process given the incredibly unique circumstances of each learner. Level 6 Life and Workplace Coaching QQI PG21153 and the Level 6 Therapeutic coaching programme QQI PG15152 students, learner progression is measured via assignment submission, observed improvement in performance and regular discussions at the end of each Module of which there are six. Final progression to using learnt skills which takes place during Modules 5 and 6.

Click to view Policy/Procedures:

3.2.4 Learner Progression Policy

3.3 Programme monitoring and review.

All programmes are monitored and reviewed in a variety of ways and represents a key element of all programme delivery. Monitoring and self-evaluation are on an on-going basis and occurs at key points in the programmes. Programmes will be reviewed every 4 to 5 years or sooner as may be necessary.

Click to view Policy/Procedure:

3.1.1 Programme Development and Review

4. Staff Recruitment and Development

4.1 Staff Recruitment

Festina Lente is an equal opportunity employer, and we appoint individuals solely based on their suitability and potential for the job. We recognise that our business performance and growth of services is dependent on appointing and retaining the most suitably qualified candidates for every position, taking account of education, experience, and expertise.

We are committed to equality of opportunity and operate our recruitment and selection procedure in full compliance with all legal requirements. At all times, applicants will be treated in a fair and consistent manner, and discrimination will not be tolerated in respect of age, gender, race, disability, family status, civil status, religion, sexual orientation, or membership of the Traveller Community. No position will be classified by reference to gender, civil, family status, sexual orientation, religious belief, age, disability, race, or membership of the Traveller Community. Detailed procedures on staff recruitment are outlined in 3.5 Staff Development, Recruitment and Selection.

Click to view Policy/Procedure: 4.1 Staff Recruitment

4.1.1 Job Requirements

When specifying requirements, only characteristics such as qualifications or experience that are considered essential to the performance of the role will be used. All job specifications will be evaluated in advance of advertising to ensure that the job specification reflects evolving changes within the role that may have occurred over time. Specific attention will be given to the teaching and assessment experience and other specific aspects of the job requirement.

4.1.2 Review and approval of job specification

The Academic Committee will review all Training Programme Staff job specifications in advance of advertising and all job descriptions must be signed off before the recruitment process proceeds. In advance of any advertisement, job specifications are reviewed to assess current and future needs. This will consider any external / internal changes and legislative changes as may have occurred.

Click to view Policy/Procedure: 4.1 Staff Recruitment

4.1.3 Advertising

Advertising of all positions will be conducted both internally and externally. All employees (including fixed- term employees) will be notified of positions that arise during their employment through the internal emailing system and internal staff meetings. Advertisements will make clear, both in wording and illustration, that the positions are open to all suitably qualified candidates, regardless of gender, civil, family status, sexual orientation, religious belief, age, disability, race, or membership of the Traveller Community. Details of all vacant positions will be fully circulated to ensure access to all suitable applicants. This includes forwarding internal advertisements to employees on leave including maternity leave and parental leave.

4.2 Staff Communication

Festina Lente is committed to ensuring that there are a variety of mechanisms that allow staff to both give and receive organisational and departmental information. Weekly and/or bi-monthly staff meetings take place within each department that provide a forum for teaching staff of Level 3 Transition Training Programme QQI PG10127. Programmes to review student progress, discuss timetables and plan for upcoming assessments. Management team meetings are held weekly or bi-monthly which allows Department heads to share information relevant to their respective areas in relation to learning related matters and other relevant information.

Click to view Policy/Procedure/s:

4.2.1 Staff Meetings

4.2.2 4.2.2 Staff Management Meetings

4.2.3 Staff Self-Monitoring

4.2.4 Staff Self Evaluation

4.3 Staff Development

Festina Lente is committed to the on-going learning, training, education, and personal development of all staff. These areas are identified at a variety of stages including recruitment process, induction process, probationary review, performance management review, individual staff requests and /or departmental or organisational needs. Staff induction takes place over one month with Managers holding responsibility for this and outlined in 3.6 Staff Development: Induction. This allows the inexperienced staff member to gradually be inducted into the department and organisation. Probationary Reviews are held within 3 months or can be held sooner as may be necessary. A minimum of two probationary review meetings are held with inexperienced staff members. Whilst the Manager is responsible for conducting Probationary Review meetings, the HR Manager is responsible for overseeing this process in terms of timing and content and – where necessary – dealing issues as they may arise. This is described in detail in Procedure No. 3.7 Staff Development: Probationary Review. Once the probationary review has been completed, staff will be involved in Performance Management Reviews (PMR). These are held every 6 weeks and allow for goal setting and reviews 3.8 Staff Development: Performance Management and Review Supervision. As part of Staff Development staff are encouraged to identify individual learning and development needs apart from mandatory training such as First Aid, Children's First, etc.

Click to view Policy/Procedure/s:

4.3.1 Staff Induction

4.3.4 Staff Performance Review

4.3.2 Staff Probation Review

4.3.4 Staff Performance Review

5 Teaching and Learning

5.1 Teaching and Learning Strategy

Festina Lente uses a variety of approaches to monitor the learners' learning experience, and this varies across programmes. For example, the Level 3 Transition Training Programme QQI PG10127 engages with learners via progress reports, annual surveys and through the key worker system. Level 4 K.W.E.T.B. Horsemanship programme learners engage with learners via progress reports and end of module evaluations with Level 6 Life and Workplace Coaching QQI PG21153 and the Level 6 Therapeutic coaching programme QQI PG15152 learner views are gathered at the end of each module and end of course evaluation. Festina Lente Enterprises CLG adopts a blended approach to learning.

The QQI Level 3 PG10127 is primarily classroom based and encourages group discussion, there are also practical elements to this course for example role play and skills demonstrations. All of which are documented, recorded, and included in each individual learner's folder. Once completed the learner's folder is reviewed by their tutor and an internal and external verification process before validation.

The QQI Level 4 K.W.E.T.B Programme also adopts a blended approach between practical and classroom-based learning. The practical environment is more suitable for the student profile and provides opportunities for vocational learning. Assessments for this course take place throughout the year through Skills Demonstrations, Portfolio's, and Examinations.

The QQI Level 6 Programmes QQIPG21153 and QQI PG15153 adopt a blend of classroom-based learning, peer working groups and practical learning. There are a range of practical assessments for example delivering a session under supervision and delivering presentations. The learners are also assessed by completing a range of research based written assignments.

5.2 A Provider Ethos That Promotes Learning

Staff are recruited in line with current recruitment procedures with academic qualifications, work experience and expertise informing the recruitment and appointment of new staff. Personal growth and development are seen as important as academic achievement and is addressed via the Individual Training Plans in the Level 3 Transition Training Programme PG10127 & Level 4 K.W.E.T.B. Level 3 Horsemanship programmes. For the Level 6 Life and Workplace Coaching QQI PG21153 and the Level 6 Therapeutic coaching programme QQI PG15152 programmes each module addresses the personal development for each learner in the context of changing roles. In addition, Festina Lente considers the use of different modes of delivery – particularly

relevant to those learners with intellectual disabilities. Considerable efforts are made to encourage maximum sense of autonomy in the learner, while at the same time encouraging adequate guidance and support for the learner. Promoting mutual respect within the learner – course facilitator relationship is seen as key and underpins all the programmes delivered. Procedures for dealing with complaints allow a fair and efficient way for learners to deal with areas of concern including learner appeals.

All modules are examined by an external examiner annually and feedback implemented into Programme delivery and development. An appeals process is part of the internal verification procedure, also a complaints officer is available to learners.

Varied and inclusive teaching methodologies are used in tandem with person centered planning. These include blended learning, flipped classroom and peer instruction. The flipped classroom has reversed the traditional educational arrangement by delivering instructional content, sometimes online, outside the classroom, while activities, including those that may have been considered homework, in the classroom. In a flipped classroom model, students may watch online lectures, collaborate in online discussions, or conduct research at home and engage in concepts in the classroom with the guidance of the tutor. Because these types of active learning allow for highly differentiated instruction, time spent in class can be used for problem solving, critical thinking, group work and research. This is strengthened by the person-Centered approach to learning under New Directions (2019) for learners engaged in the Level 3 Transition Training Programme PG10127. Festina Lente is a small institution where everyone knows each other which generates a sense of belonging for learners and staff resulting in developing positive supportive relationships.

5.2.1 Appeals Procedure: To outline the process for learners to appeal an assessment /assignment process such that they believe that the assessment/assignment conditions and/or process conditions negatively affected the assessment/assignment performance. Students wishing to appeal their assessment or assignments will first contact the Training coordinator after which there is a prescribed timeline during which the appeal will be processed and described in 5.2 Appeals Procedure.

Click to view Policy/Procedure/s:

5.2 Appeals Procedure

5.2.1 Re-check Procedure

5.2.2 Review Procedure

5.2.3 Non-Academic Complaints and Appeals

5.3: National and International Effective Practice

As part of Festina Lente's international engagement, it has participated in three Erasmus partnerships that help to place Festina Lente at the forefront of best practice models and with up-to-date research. On a national level, Festina Lente adheres to all best practice guidance and models. The Department of Education and Skills govern its policies and procedures, QQI, HSE, Government Directives and by on-going staff education and training. Festina Lente collaborates with many local and national organisations in a variety of mediums (i.e., area management meetings, Bray Area Partnership) and will continue to do so, to fully enhance our teaching and research. Festina Lente has acquired a strong national and international reputation in its learning and educational programmes through the medium of both equestrianism and horticulture.

5.4: Learning environments

Festina Lente's learning environments have evolved over time to provide small learning spaces with high learner staff ratios and opportunities for 1:1 tuition and group work. Festina Lente provides experiential learning environments within the Equestrian Learning Center and Walled Gardens. A small specialised equine library is also available to learners. Much of the learning takes place within the outdoor environment of both the Equestrian Learning Center and the Walled Garden. Festina Lente has created a positive learning environment that embraces diversity and inclusion and provides all necessary support in this regard. Festina Lente Enterprises CLG employs two full-time maintenance personnel that respond to all premise servicing and maintenance needs. External contractors are used for areas such as IT support, security, cleaning, etc., In addition Festina Lente Enterprises CLG employs an Assistant Chief Executive to support all HR and administrative needs. There is one designated social media and communications person who continuously promotes the services and programmes that are available. Support that is necessary for supporting the learning programmes is raised and discussed as part of staff meetings.

Click to view Policy/Procedure/s: 5.4 Learning Environment

6. Assessment of Learners

6.1 assessment of learning achievement

Ongoing assessment is seen as a key part of both students learning and the teaching process for tutors. There is a strong emphasis on the active engagement and participants of learners at all stages of their learning. Assessment is an ongoing process which allows feedback to be given to learners as close as possible to when the learning occurs. A one-to-one approach is used for delivering assessment results in line with the learning abilities of the students. This one-to-one approach is used for all Programme levels.

Click to view Policy/Procedure/s: 6. Assessment of Learners

7.Supports for Learners

7.1 An integrated approach forms the perspective of the learner

Festina Lente is committed to providing adequate resources such that learners can maximise their learning. The resource allocation is monitored on a regular basis both at the start of the learning experience, throughout and at the end of the learning process. Learner perspectives are integrated into this process throughout. The cognitive abilities of learners can inform the most effective time limit for conducting evaluations. For example, the recall of a learner in a Level 3 Transition Training Programme PG10127 will vary significantly to that of a Level 6 Life and Workplace Coaching PG21153 and the Level 6 Therapeutic coaching programmes PG15152 learner. As such, the most effective ways of evaluating the effectiveness of learner support will vary.

There are a wide variety of ways through which learners are informed about the full range of services available to them. For potential learners this can include open days, career fairs, social media, and promotional Materials. For those learners who wish to take part in orientation, this is an opportunity for learners (and their families where appropriate) to develop a greater insight into the programmes and to learn more about the range potentially available to them. Once engaged with the learning programme, learners receive an Induction Pack. Within the first three months of the learner commencing within the Level 3 Transition Training Programme PG10127 & Level 4 K.W.E.T.B. Horsemanship programmes or within the first module of the Level 6 Life and Workplace Coaching PG21153 and the Level 6 Therapeutic coaching programme PG15152 the range of services available to learners is discussed.

Programme evaluations play a key role within all learning programmes. As part of these evaluations, emphasis is placed on the learner's views of the adequacy of the learning environments and learner supports and ways in which these can be improved upon.

Although there are five distinct learning programmes at Festina Lente Enterprises CLG, they all share common features including in most cases the same learning environments- the Equestrian Learning Centre and walled garden. As such, there is an elevated level of coherency amongst the various teaching staff that is formalised through the Academic Committee.

The promotion of resources and supports to learners is achieved through module specific information e.g., work experience, information boards with the learning areas and/or in public places, ITP meetings, Key working meetings where necessary can highlight specific resources and/or supports based on the specific needs of any one learner.

Click to view Policy/Procedure/s:

7.1.4 Evaluation Level 6

7.2 Pastoral Care

Festina Lente adopts a holistic approach to the needs of all learners. Pastoral care support is provided through a variety of ways including one to one support from teaching staff and/or from the department head. Where the need transcends beyond the remit of the teaching staff or other staff, alternate support is recruited from within the local community such as counsellor, psychiatrists, psychologist, etc... These needs can emerge through the key working system or may present as an emerging need at any given time**.**

Click to view Policy/Procedure/s: 7.2 Pastoral Care

7.3 Access to Services Related to Programmes

Academic and other support services related to the learning programmes are provided to learners across all programmes. The adequacy of service support is evaluated on an annual basis and amongst other data sets uses various evaluations to support this process. Learners from all programmes have access to either on – line or hard copies of learning materials.

7.4 Learner Representation – Student Council

Festina Lente operates a student council for those learners in the Level 3 Transition Training Programme PG10127. This group meets every 6 weeks and is facilitated by an independent staff member. The student council meets with the Academic Committee every 3 months and is supported by an independent staff member. Given the small group size of the Level 6 Life and Workplace Coaching PG21153 and the Level 6 Therapeutic coaching programme PG15152 programmes and the 10-month duration of the programme with six modules every 3 months a student council model is not considered appropriate.

Click to view Policy/Procedure/s:

7.3.2 Student Council Election

7.3.3 Student Council Formation

7.3.4 Student Council Function

7.5 Career Guidance

The career planning process commences with learners in year two of the three-year programmes (Level 3 Transition Training PG10127. This is supported by the identification of work experience places by way of supporting learners to make informed choice on their career plan referred to earlier in the work experience procedure. In addition to work experience placements, the career planning also includes Module work, mock interviews with local Career Guidance Services, attendance at Open Days and assistance with further academic courses 6.15 Career Planning.

For most Level 6 learners on the Life and Workplace Coaching PG21153 and the Therapeutic coaching programmes PG15152 most students have a well-developed career plan. That said, a 'next step' is incorporated into Module 5 and/or Module 6.

Click to view Policy/Procedure/s: 7.4 Career Planning

8.Information and Data Management

The purpose of this section is to provide a concise outline regarding the data protection obligations and Data procedures of Festina Lente Enterprises CLG. The Assistant Chief Executive acts as Festina Lentes Data controller.

8.1 Festina Lente Enterprises CLG as a Data controller

Festina Lente retains certain data types re: customers/staff/students and others over the course of the day to day running of its business. Festina Lente Enterprises CLG is a data controller with reference to the personal data which it manages, processes and stores. (Refer to 'Definitions/Roles and responsibilities' below for a full list of all GDPR terminology and definitions.)

Employees/customers/vendors of Festina Lente Enterprises CLG should refer to the guidance provided by the Office of the Irish Data Protection Commissioner (www.dataprotection.ie) regarding best practice in this area.

Over the course of its daily organisational activities, Festina Lente Enterprises CLG acquires, processes, and stores personal data in relation to living individuals. To that extent, Festina Lente Enterprises CLG is a data controller, and has obligations under the Data Protection legislation, which are reflected in this document. In accordance with Irish Data Protection legislation, this data must be acquired and managed fairly.

Festina Lente Enterprises CLG is committed to ensuring that all staff members have sufficient awareness of the legislation to be able to anticipate and identify a data protection issue, should one arise. In such circumstances, staff members must ensure that the Data protection officer is informed, to ensure that

appropriate corrective action is taken. Due to the nature of the services provided by Festina Lente Enterprises CLG there is a regular and active exchange of personal data between Festina Lente Enterprises CLG and its data subjects (customers/staff /vendors.) In addition, Festina Lente Enterprises CLG exchanges personal data with data processors on the data subjects' behalf. This is consistent with Festina Lente Enterprises CLG's obligations under the terms of its contracts with its data processors.

This policy provides the guidelines for this exchange of information, as well as the procedure to follow if a staff member is unsure whether such data can be disclosed. In general terms, the staff member should consult with the Data protection officer to seek clarification.

Click to view Policy/Procedure/s: 8.1 Data Management Procedure

8.1.1   Aim of policies and Procedures

As a data controller, Festina Lente Enterprises CLG and its staff must comply with the data protection rules set out in the relevant Irish and European legislation. Namely:

- General Data Protection Regulation (GDPR) 2020
- Data Protection Act 2018
- The "Law Enforcement Directive" (Directive (EU) 2016/680) which has been transposed into Irish law by way of the Data Protection Act 2018
- Data Protection Acts 1988 and 2003
- 2011 ePrivacy Regulations (S.I. No. 336 of 2011 – the European Communities (Electronic Communications Networks and Services) (Privacy and Electronic Communications) Regulations 2011)

These Policy applies to all data types of personal data collected, processed, and stored by Festina Lente Enterprises CLG during its day-to-day activities.

In its role as an employer, Festina Lente Enterprises CLG may keep information relating to a staff member's physical, physiological, or mental well-being, as well as their economic, cultural, or social identity. Personal data also include a combination of identification elements such as physical characteristics, aliases, occupation, home address, etc

Click to view Policy/Procedure/s:

8.3 Data Protection Procedure re: GDPR

The policy covers both personal and sensitive personal data held by Festina Lente Enterprises CLG. Re: Employees/students/volunteers/vendors and other stakeholder. The policy applies equally to personal data held in both manual and automated form. All personal and sensitive personal data will be treated with equal care by Festina Lente Enterprises CLG.

8.1.3   Definitions/ Roles and responsibilities

For the avoidance of doubt, and for consistency in terminology, the following definitions apply within this Policy.

Data	This includes both automated and manual data. • Automated data means softcopy data held on an internal computer network, or stored with the intention that it will be processed on an internal computer network. • Manual data means data that is processed as part of a relevant hardcopy filing system, or which is stored with the intention that it forms part of a relevant filing system.
Personal Data	Information that relates to a living individual, who can be identified either directly from that data, or indirectly in conjunction with other data which is likely to come into the legitimate possession of Festina Lente Enterprises CLG.
Sensitive Personal Data	Sensitive personal data is personal data which relates to specific aspects of one's identity or personality, and includes information relating to ethnic or racial identity, political or ideological beliefs, religious beliefs, trade union membership, mental or physical wellbeing, sexual orientation, or criminal record.
Data Controller	The legal entity responsible for the acquisition, processing, and use of the personal data. In the context of this policy, Festina Lente Enterprises CLG is the data controller.
Data Subject	A living individual who is the subject of the personal data, i.e., to whom the data relates either directly or indirectly. For example, Festina Lente Enterprises CLG staff, students, and tutors.

Data Processor	A person or entity who processes personal data on behalf of Festina Lente Enterprises CLG because of a formal, written contract, but who is not an employee of Festina Lente Enterprises CLG. Currently N/A
Data Protection Officer	A person appointed by Festina Lente Enterprises CLG (The Assistant C.E. (Chief Executive) being the person currently responsible) to monitor compliance with the appropriate data protection legislation, to deal with Subject Access Requests, and to respond to data protection queries from staff members and the public.

8.1.4 Third-party processors

During its role as data controller, Festina Lente Enterprises CLG may engage with third-party service providers, or data processors, to process /store personal data on its behalf.

In each case, a formal, written contract is in place with the processor, outlining their obligations in relation to the personal data, the security measures that they must have in place to protect the data, the specific purpose, or purposes for which they are engaged, and the clear understanding that they will only process the data in compliance with the Irish Data Protection legislation. The contract will also include reference to the fact that the data controller is entitled, from time to time, to audit or inspect the data management activities of the data processor, and to ensure that they remain compliant with the legislation, and with the terms of the contract.

As a data controller, Festina Lente Enterprises CLG ensures that any entity which processes personal data on its behalf (a data processor) does so in a manner compliant with the Data Protection legislation through a formal Data Processor Agreement. Regular audit trail monitoring will be done by the Data Controller to ensure compliance with this Agreement by any third-party entity which processes personal data on behalf of Festina Lente Enterprises CLG.

Failure of a data processor to manage Festina Lente Enterprises CLG's data in a compliant manner will be viewed as a breach of contract and will be pursued through the courts.

Failure of Festina Lente Enterprises CLG's staff to process personal data in compliance with this policy may result in disciplinary proceedings.

8.1.5 Festina Lente' data protection rules

The following key rules are enshrined in Irish legislation and are fundamental to Festina Lente Enterprises CLG's data protection policy. In its capacity as data controller, Festina Lente Enterprises CLG ensures that all data shall:

1) **Be obtained and processed fairly and lawfully** (GDPR Principle: Lawfulness, Fairness and Transparency)

   For data to be obtained fairly, the data subject will, at the time the data are being collected, be made aware of:

   - The identity of the data controller (i.e., Festina Lente Enterprises CLG).

   - The purpose(s) for which the data is being collected.

   - The person(s) to whom the data controller may disclose the data.

   - Any other information that is necessary so that the processing may be fair.

   - Festina Lente Enterprises CLG will meet this obligation in the following way/s:

   1. Where possible, the informed consent of the data subject will be sought before their data is processed.
   2. Where it is not possible to seek consent, Festina Lente Enterprises CLG will ensure that collection of the data is justified under one of the other lawful processing conditions – legal obligation, contractual necessity, etc.
   3. Where Festina Lente Enterprises CLG intends to record activity on CCTV or video, a Fair Processing Notice will be posted in full view, prior to the recording.
   4. Processing of the personal data will be conducted only as part of Festina Lente Enterprises CLG's lawful activities, and it will safeguard the rights and freedoms of the data subject.
   5. The data subject's data will not be disclosed to a third party other than to a party contracted to Festina Lente Enterprises CLG and operating on its behalf, or where Festina Lente Enterprises CLG is required to do so by law.
   6. The data obtained only for one or more specified, legitimate purposes *(GDPR Principle: Purpose Limitation)* Festina Lente Enterprises CLG will obtain data for purposes which are specific, lawful, and clearly stated. A data subject will have the right to question the purpose(s) for which Festina Lente Enterprises CLG holds their data, and it will be able to clearly state that purpose or purposes.
   7. The Data will n*ot be further processed in a manner incompatible with the specified purpose(s) (GDPR Principle: Purpose Limitation).* Any use of the data by Festina Lente Enterprises CLG will be compatible with the purposes for which the data was acquired.
   8. The Data will b*e kept safe and secure (*GDPR Principle: Integrity and Confidentiality*).* Festina Lente Enterprises CLG will employ high standards of security to protect the personal data under its care. Access to, and management of, staff and customer records is limited to those staff members who

have appropriate authorisation and password access. In the event of a data security breach affecting the personal data being processed on behalf of the data controller, the relevant third-party processor will notify the data controller without undue delay.

9. The Data will Be kept accurate, complete, and up to date where necessary *(GDPR Principle: Accuracy)*

Festina Lente Enterprises CLG will:

- Ensure that administrative and IT validation processes are in place to conduct regular assessments of data accuracy.
- Conduct periodic reviews and audits to ensure that relevant data is kept accurate and up to date.
- Ensure that staff contact details and details on next-of-kin are reviewed and updated every two years, or on an 'ad hoc' basis where staff members inform the office of such changes.
- Conduct regular assessments to validate the need to keep certain personal data.

10. The Data will be adequate, relevant, and not excessive in relation to the purpose(s) for which the data were collected and processed *(GDPR Principle: Data Minimisation).*

Festina Lente Enterprises CLG will

- ensure that the data it processes in relation to data subjects are relevant to the purposes for which those data are collected. Data which are not relevant to such processing will not be acquired or maintained.
- Not be kept for longer than is necessary to satisfy the specified purpose(s) (*GDPR Principle: Storage Limitation)*
- Festina Lente Enterprises CLG has identified data categories, with reference to the appropriate data retention period for each category. For hardcopy documents we employee the services of an onsite document shredding company. There are also shredding machines placed throughout Festina lente for day-to-day shredding.
- Once the respective retention period has elapsed, Festina Lente Enterprises CLG undertakes to destroy, erase, or otherwise put this data beyond use.

11. Be managed and stored in such a manner that, in the event a data subject submits a valid Subject Access Request seeking a copy of their personal data, this data can be readily retrieved and provided to them *(GDPR Principle: Accountability).* Festina Lente Enterprises CLG has implemented a Subject

Access Request procedure by which to manage such requests in an efficient and timely manner, within the timelines stipulated in the legislation.

Click to view Policy/Procedure/s:

8.5 Retention of Records Procedure

8.6 Data Access Request Procedure

8.1.6 Implementation

As a data controller, Festina Lente Enterprises CLG ensures that any entity which processes personal data on its behalf (a data processor) does so in a manner compliant with the Data Protection legislation through a formal Data Processor Agreement.

Regular audit trail monitoring will be done by the Data Controller to ensure compliance with this Agreement by any third-party entity which processes personal data on behalf of Festina Lente Enterprises CLG.

Failure of a data processor to manage Festina Lente Enterprises CLG's data in a compliant manner will be viewed as a breach of contract and will be pursued through the courts.

Failure of Festina Lente Enterprises CLG's staff to process personal data in compliance with this policy may result in disciplinary proceedings.

Click to view Policy/Procedure/s: 8.2 Data Access Requests

8.2.1   Form of the request

A request for personal data is known as a data access request. However, it may not always be necessary to treat a request for information as a formal request under the Irish Data Protection legislation.

If the request for information is one which Festina Lente Enterprises CLG would ordinarily deal with within the normal course of business, e.g., a request for a copy of an assignment by a course attendee, Festina Lente Enterprises CLG will consider whether this is a formal subject access request under the Data protection Acts, or whether it can be managed as a 'business-as-usual' process.

Where the Controller treats the request as a formal Subject Access Request, the Controller is no longer entitled to ask for a fee to deal with the administrative steps involved in fulfilling the request.

To be valid, a Subject Access Request should be in writing via email and should include sufficient information to identify the Data Subject to the Data Controller's satisfaction.

When these criteria are satisfied, the Data Access Request is considered valid, and the one-month response period commences.

Festina Lente Enterprises CLG will strive to respond to a valid request as quickly as possible, but nonetheless within this one-month period.

Click to view Policy/Procedure/s: 8.6 Data Access Request Procedure

8.2.2   Exemptions

Some material is exempt from inclusion in the response to a Subject Access Request.

This includes the content of negotiations with the Data Subject. If the Data Controller is negotiating with the Data Subject at the time at which the Data Subject makes the Subject Access Request, the Data Controller does not have to reveal requested information if to do so would be likely to prejudice those negotiations. Once the negotiations are complete and have been put into effect, the whole file becomes subject to Subject Access in the normal way.

Emails are subject to Subject Access, as are archived computerised and manual data. It must be remembered that CCTV footage and tapes of telephone conversations will also be included within the scope of the Request and must be searched on receipt of a Subject Access Request if the data subject so requires.

Other general exemptions to subject access are national security purposes and the prevention or detection of crime, or the apprehension or prosecution of offenders.

Where the personal data contain health information, there is a duty on the Data Controller to consult an appropriate health professional before the information can be released to the Data Subject. This is to avoid disclosing information about adverse health conditions to a Data Subject where the disclosure may be harmful or distressing to the Data Subject or to another person.

This requirement does not apply where the Data Subject has already had access to the information, or where the Data Subject originally provided the information himself or herself.

Where Festina Lente Enterprises CLG is likely to miss the one-month deadline for responding to the Requestor,
Festina Lente Enterprises CLG will inform the Requestor of the likelihood of this delay and will provide a revised timeline within which it will respond – this revised timeline cannot exceed a further one-month period.

Festina Lente Enterprises CLG recognises that failure to respond to a Subject Access Request within the initial one-month period, or to advise them of the possibility of a delay, gives rise to the right for the

individual to complain to the Office of the Data Protection Commissioner, and may well give rise to an investigation by the Commissioner.

In addition, failure to respond within one month, without advising the requestor of the likelihood of the delay, will be considered a breach of the GDPR.

8.2.3 Communicating with the Data Subject

Festina Lente Enterprises CLG will communicate directly with the Data Subject once a valid Subject Access Request has been received, acknowledging receipt, and providing a commitment to respond in a timely and appropriate manner.

Rather than having to provide a copy of all data held by the Controller, this contact may be used to assist the Data Subject to specify the exact information he or she wishes to receive, thereby reducing both effort and the time and cost required to collate and provide the data being sought. At this point the data subject should be made aware, if they are not already aware, of Festina Lente Enterprises CLGs Subject Access request form (Appendix 9: Festina Lente Enterprises CLG Subject Access Request Form), which could facilitate the data subject with their request. This form is available on Festina Lente Enterprises CLGs website and on the internal SharePoint system.

However, we acknowledge that, where the Data Subject is adamant that he or she wishes to receive a copy of everything the Data Controller holds about them, then Festina Lente Enterprises CLG will fulfil a complete and comprehensive search of the computerised and manually held data in the organisation.

8.2.4 Systems Search

Unless there is a legitimate option to reduce the scope of the Request, a search of all databases and all relevant filing systems (manual files) which are relevant to the scope of the request will be conducted by the organisation.

There is no obligation to search back-up files, on the basis that the data in back-up is a copy of the data already held either on the 'active' systems, or in archive. Festina Lente Enterprises CLG will organise the response to the Request by giving one individual the responsibility for issuing requests for information to the relevant stakeholders within the organisation and receiving all the returns. This role will fall to the Data Controller in Festina Lente Enterprises CLG. The coordinator will then have the job of printing out all computerised information which has been returned to them by each department or stakeholder. They will also have received photocopies of all relevant manual files and will therefore collate two sets of material – one of computer printouts and the other of photocopied manual files.

8.2.5 Manual files

The manual files which are relevant to the Acts are those which pass the conditions set out in the definition of a relevant filing system. The key criterion is whether the file in question forms part of a structured set. The set must be structured by reference to the Requestor in their personal capacity, or characteristics relating to requestor personally. If, for example, the manual files are organised in alphabetical name order, or by payroll number, they will form a structured set.

8.2.6 Restrictions following receipt of a request

Compliance with the DP Acts is not intended to interfere with the normal running of a Data Controller's business and following the receipt of a valid Request, Festina Lente Enterprises CLG is permitted to make changes to the requested information in the normal course of operation provided that no changes are made because of the Request itself; this applies even where the Data Controller would rather not release the information in its current form. This includes the correction of any incorrect data held as the principle is that the individual has a right to request the actual information held about them (whether it is accurate or correct).

8.2.7 Permanent and Intelligible Form

Where it is possible to do so, Festina Lente Enterprises CLG will consult with the Data Subject as to the form in which we hand over the information to the Data Subject.

The default position is that the Data Subject gets a hard copy of the information in a "Permanent and intelligible format" (which may make it necessary for any internal codes released with the information to be explained), unless the supply of such a copy is not possible or would involve a disproportionate effort, or the Data Subject agrees otherwise. Any terms which are not intelligible without an explanation must be accompanied by an explanation (e.g., a Glossary of Terms).

The default arrangement is to provide the material in printed (paper) format, unless otherwise indicated as acceptable by the Requestor (e.g., material to be provided electronically and securely on CD-ROM or USB stick).

Finally, once the response to the Subject Access Request has been finalised, the request coordinator will make a full copy of the material to be retained by the organisation for our own reference.

The copy of the requested material will be dispatched by secure, registered delivery, and we will seek timely confirmation from the Data Subject on receipt of the material.

These records will be used as reference material in the future, if there is any dispute as to the content or timeliness of the response provided to the Data Subject.

Upon receipt of their data, under the GDPR the data subject has the right to make the following requests:

8.2.8   Right to be forgotten

Under Article 17 of the GDPR individuals have the right to have personal data erased.
This is also known as the 'right to be forgotten.' The right is not absolute and only applies in certain circumstances.

Individuals have the right to have their personal data erased if:

- the personal data is no longer necessary for the purpose for which it was originally collected or processed.
- Festina Lente Enterprises CLG is relying on consent as its lawful basis for holding the data, and the individual withdraws their consent.
- Festina Lente Enterprises CLG is relying on legitimate interests as its basis for processing, the individual objects to the processing of their data, and there is no overriding legitimate interest to continue this processing.
- Festina Lente Enterprises CLG is processing the personal data for direct marketing purposes and the individual objects to that processing.
- Festina Lente Enterprises CLG has processed the personal data unlawfully (i.e., in breach of the lawfulness requirement of the 1st principle).
- Festina Lente Enterprises CLG must do it to comply with a legal obligation; or
- Festina Lente Enterprises CLG has processed the personal data to offer information society services to a child.

The GDPR specifies two circumstances where organisations should tell other organisations about the erasure of personal data:

- the personal data has been disclosed to others; or
- the personal data has been made public in an online environment (for example on social networks, forums, or websites).

The right to erasure does not apply if processing is necessary for one of the following reasons:

- to exercise the right of freedom of expression and information.
- to comply with a legal obligation.
- for the performance of a task conducted in the public interest or in the exercise of official authority.
- for archiving purposes in the public interest, scientific research historical research or statistical purposes where erasure is likely to render impossible or seriously impair the achievement of that processing; or
- for the establishment, exercise, or defence of legal claims.

The GDPR also specifies two circumstances where the right to erasure will not apply to special category data:

- if the processing is necessary for public health purposes in the public interest (e.g., protecting against serious cross-border threats to health, or ensuring high standards of quality and safety of health care and of medicinal products or medical devices); or
- if the processing is necessary for the purposes of preventative or occupational medicine (e.g., where the processing is necessary for the working capacity of an employee; for medical diagnosis; for the provision of health or social care; or for the management of health or social care systems or services). This only applies where the data is being processed by or under the responsibility of a professional subject to a legal obligation of professional secrecy (e.g., a health professional).

8.2.9   Right to Rectification

Under Article 16 of the GDPR individuals have the right to have inaccurate personal data rectified. An individual may also be able to have incomplete personal data completed – although this will depend on the purposes for the processing. This may involve providing a supplementary statement to the incomplete data.

Although you may have already taken steps to ensure that the personal data was accurate when you obtained it, this right imposes a specific obligation to reconsider the accuracy upon request.

In an instance where Festina Lente Enterprises CLG receives a request for rectification reasonable steps must be taken to satisfy the agency that the data is accurate and to rectify the data if necessary. The arguments and evidence provided by the data subject must be considered.

The term 'reasonable steps will depend on the nature of the personal data and for what it will be used. The more important it is that the personal data is accurate, the greater the effort should be when checking its accuracy and, if necessary, taking steps to rectify it. For example, a greater effort should be made to rectify inaccurate personal data if it is used to make significant decisions that will affect an individual or others, rather than trivial ones.

Any action which has already been taken to verify the accuracy of the data prior to the challenge by the data subject can also be considered.

As part of the day-to-day operation of the organisation, Festina Lente Enterprises CLG's staff engages in active and regular exchanges of information with data subjects. Where a valid, formal request is submitted by a data subject in relation to the personal data held by Festina Lente Enterprises CLG which relates to them, such a request gives rise to access rights in favour of the Data Subject.

In certain circumstances, it will be possible to charge a "reasonable fee" to the data subject to cover administrative charges where the request involves the gathering of substantial amounts of data. The data subject will be entitled to receive a copy of their personal data in printed, oral, or electronic format as per their own specific preference.

There are specific timelines within which Festina Lente Enterprises CLG must respond to the data subject, depending on the nature and extent of the request.

Festina Lente Enterprises CLG's staff will ensure that such requests are forwarded to the Internal Support Coordinator in a timely manner, and they are processed as quickly and efficiently as possible, but within not more than one month, with a possibility to extend this period for particularly complex requests. Festina lente has a procedure in place.

Click to view Policy/Procedure/s: 8.6 Data Access Request Procedure

8.3 Learner Information Systems

Festina Lente uses Moodle as our cloud-based Learning Management Systems for our Level 6 Life and Workplace Coaching QQI PG21153 and Therapeutic coaching programme QQI PG15152 programmes students since 2022. Moodle do not collect, use, or monetise any student data or anyone's personal information. Only the course facilitator and the Training coordinator can access Moodle.

The Level 3 Transition Training Programme QQI PG10127 & Level 4 K.W.E.T.B. Horsemanship programmes (run on behalf of K.W.E.T.B. (Kildare Wicklow Educational Training Board) and H.S.E. use secure email as the main form of communication with students.

All Festina Lente Data is stored on private servers and backed up nightly. Only staff members with a reason to access have access to the course folders on our company drives.

Click to view Policy/Procedure/s: 8.4 Learner Information Systems

8.3 Records maintenance and retention

The Data Retention & Destruction policy sets out the obligations regarding the retention of personal data collected, held, and processed by the organisation and the destruction of personal data in accordance with EU Regulation.

Click to view Policy/Procedure/s:

9.Public Information and Communication

Festina Lente provides information about its activities and services including the QQI accredited programmes which is made available via its website www.festinalente.ie and other social media platforms. It also produces a wide variety of hard copies relating to services and activities. Our Quality Assurance Manual is available on the website and on SharePoint for employee access.

9.1 Public information

Information relating to the education and training programmes is accessible via the website and printed course materials in line with the 2021 Act. Course materials for general public information are reviewed regularly and updated as necessary but at least at the end of the academic year. This includes if the course leads to a major award, minor award of special purpose award and what progression options may be available.

9.2 Learner Information

At the start of learners (or their advocate/carers) engagement with the programme they are given information about all aspects of the course including an overview of Quality and Qualifications Ireland, the NFQ, award type and level and details of the Protection of Enrolled Learner arrangements. This is especially the case for the Special Purpose Award Life and Workplace Coaching as there is no similar course currently being delivered in Ireland.

9.3 Publication of Quality Evaluation Reports

Festina Lente is currently reviewing the process for the evaluation of the various programmes. Once completed, findings will be made available on its website.

Click to view Policy/Procedure/s:

9.1 Annual Report procedure

9.2 Publication of External Authentication Reports

10.Other Parties Involved in Education and Training

10.1 Peer relationships with the broader education and training community

Festina Lente provides learning programmes that lead to Minor and Major Awards and Special Purpose Awards in line with QQI policies and procedures. Festina Lente does not provide programmes in partnership with other learning or educational bodies. Festina Lente does not engage with external partnerships or second providers.

10.2 Expert Panellists, Examiners and Authenticators

Festina Lente recruits and appoints suitable external authenticators to conduct the authentication process for the Level 3 Transition Training Programme QQI Programme code PG10127, Level 4 K.W.E.T.B. Horsemanship programme, Level 6 Life and Workplace Coaching QQI PG21153 and the Level 6 Therapeutic Coaching Programme QQI PG15152. Authenticators have expertise and experience in the relevant area.

Click to view Policy/Procedure/s:

10.1 External Authentication List

10.2 External Authentication appointments

11.Self-evaluation, Monitoring and Review

All learning and educational programmes are evaluated both during course delivery and at the end of the course and are seen as key to the ongoing improvement to the courses.

11.1 Provider owner internal review, self-evaluation, and monitoring

For the Level 3 Major Award in Transition Training Programme PG10127 and K.W.E.T.B. Level 4 K.W.E.T.B. Horsemanship programme an Annual Review of Modules is conducted with subsequent actions resulting. A peer review approach is also used whereby peer Programme Facilitators sit in on classes and critique. Finally, the Programme Facilitators Manager also sits in periodically and reviews the sessions. For the Level 6 Life and Workplace Coaching QQI PG21153 and Special Purpose Award Life and Workplace Coaching and the Level 6 Therapeutic coaching programme QQI PG15152 an end of course, review is carried out. In addition, a module review is carried out after each module with subsequent actions being documented and actioned.

Click to view Policy/Procedure/s: 11.1 Evaluation & Review procedure Provider owner internal review, self-evaluation, and monitoring

11.2 Internal Self-Monitoring

A range of quality measures are used for internal self-monitoring as noted above. In addition, the internal self-monitoring process includes course completion rates, grades achieved, follow-up surveys and course facilitator self-assessment.

Click to view Policy/Procedure/s: 11.2 Annual Survey Provider owner internal review, self-evaluation, and monitoring

11.3 Self-evaluation, Improvement and Enhancement

As noted above in 11.1 a variety of self-evaluation processes are in place for both learners and course facilitators. It also includes feedback from other key stakeholders such as parents, family members, carers,

and employers for the Level 3 Transition Training Programme QQI PG10127. A self-evaluation report is generated from the above noting areas for improvement.

Click to view Policy/Procedure/s:11.3 Delivering QQI Programmes as a Second Provider

11.4 Provider Owned Quality Assurance Engages with External Quality Assurance

Festina Lente's quality assurance system has been developed in line with Qualifications and Quality Assurance (Education and Training) Act, 2012 and in line with Kildare Wicklow Education Board and HSE. Procedure 10.3 Delivering QQI Programmes as a Second Provider outlines details the arrangement in place between Festina Lente and the Kildare, Wicklow, Education, Training, Board (KWETB).

Section 3: Quality Assurance Supporting Procedures

Introduction to QA procedures

This section provides a detailed description of the various policies and procedures that have been outlined in the Quality Assurance Manual.

As set out in the Quality Assurance Manual Festina Lente provides the following programmes:

- Transition Training Programme QQI PG10127
  Award: Major Award in General Learning 3M0874 (funded by the H.S.E.)
- Horsemanship Level 4 K.W.E.T.B. programme
  Award: Major Award Horsemanship Award (validated and funded by K.W.E.T.B.)
- Life and Workplace Coaching QQI PG21153
  Award: Level 6 Special Purpose Award 6S3153
- Therapeutic Coaching Programme QQI Programme PG15152
  Award: Level 6 Component Award 6N1975/ 6N3087/ 6N1949

Each Programme operates within its own separate context and in some cases will have its own set of procedures within each specific policy.

1. Governance and Management of Quality

1.1 Board of Directors: Terms of Reference:

1. To ensure that a medium to long-term Strategic Plan (3-5 years) is developed in conjunction with the Board, staff, service-users, and other key stakeholders. This plan will be reviewed and amended as appropriate on an on-going basis.

2. To lead and motivate the team to achieve the aims of the Strategic Plan.

3. To be committed to developing and delivering services to marginalised groups.

4. To ensure that comprehensive procedures for financial control and accountability are developed, implemented, and reviewed.

5. To ensure that monthly reports and all other reports as required are prepared for Board meetings and/or members of the Board.

6. To ensure that Festina Lente Enterprises CLG operates within all national guidelines as appropriate, e.g., HSE, K.W.E.T.B., Charity Regulatory Authority and Pobal guidelines.

7. To ensure that Festina Lente complies with all relevant and appropriate legislation and European union directives and relevant codes of practice ensuring the equality, privacy and safety of all trainees, staff, and visitors.

8. To ensure that all activities comply with the Health, Safety and Welfare Act 2005.

9. To ensure that Festina Lente Enterprises CLG complies with all applicable employment legislation and adheres to relevant codes of good practice in relation to equal opportunities.

10. To ensure that adequate insurance cover is maintained and reviewed annually for adequacy.

11. To ensure that there is effective communication systems are in place which ensure that trainees, staff, Board of Directors, and other stakeholders are kept informed of relevant information in a timely manner.

12. To develop, implement and evaluate an annual fundraising plan in conjunction with the Board.

13. To ensure on an annual basis that applications are made to the government/funding agencies for relevant grants.

14. To ensure that any irregularity that may compromise the integrity or management of Festina Lente is reported to the Chairperson of Board of Directors or directly to the Board of Directors.

15. To build and maintain excellent working relationships with colleagues and service-users.

16. To perform any other duties that are within the scope and spirit of the job as requested by Chairperson of Festina Lente Enterprises CLG 'Board of Directors.

1.2 The Role of the Academic Committee

Name   Academic Committee & Management of Quality Assurance

Scope   This policy describes how Festina Lente Enterprises CLG ensures Quality Assurance of all QQI Programmes through the Academic Committee

Procedures

- The role of the Academic Committee is to oversee and assure the quality and standards of academic matters in the organisation including the annual review of learner enrolment, retention, completion, and progression statistics.
- The Committee reviews academic quality assurance policies, procedures, and governance framework on an ongoing basis.
- The Committee is responsible for overseeing the assessment and examination procedures and ratifying the appointment of external examiners.
- The Committee will review all external authentication reports/exam panel meeting minutes and ensure recommendations are implemented to continuously improve programme delivery and development.
- The Committee completes an annual review of academic budgets and resources.
- The Committee evaluates learner feedback identifying areas for development and implement appropriate change.
- The Committee identifies and reviews the need for new assessment instruments where appropriate.
- The Academic Committee meets on a quarterly basis and consists of QQI Instructor's, external educational advisor, and a student representative. (See terms of reference)

Persons responsible

Academic Committee Members

Records to be kept.

Academic Committee meeting minutes

1.3 Risk Assessment

Name   Risk register procedure

Scope   This outlines the procedures in place to ensure all organisational risks are identified, monitored, communicated, and recorded and that appropriate strategies are implemented to reduce these risks.

Procedures

1. Festina Lente Enterprises CLG maintains a risk register to ensure a system of governance and appropriate procedures are in place that uphold the integrity of education and training offered.
2. The risk registers highlight seven key areas of risk management.
   These areas include.
   a. Strategic
   b. Governance and Organisation Structure
   c. Financial
   d. Human Resources and Staffing Issues
   e. Health and Safety
   f. Reputational
   g. Academic Quality and Teaching
3. The Assistant CE is responsible for maintaining the risk register and alerting the CEO and Board of Directors of all emerging risks, planned risk assessments and strategies to mitigate these risks.
4. The risk register is reviewed and approved by the Board of Directors on an annual basis and recorded in the Board of Directors meeting minutes.

Persons responsible

Assistant C.E.

Board of Directors

Records to be kept

Risk Register/s

Risk Assessment's

Board of Directors meeting minutes

1.4 Organisational Culture Policy

Name   Embedding a Quality Culture

Scope   This policy describes how Festina Lente ensures a culture of quality across the Organisation.

Procedures

1. Implementation and review of quality assurance policies including Safeguarding, Person-Centeredness, Evaluation & Review.
2. Festina Lente provides all staff with a comprehensive staff handbook outlining all policies and processes that are implemented to ensure a positive working environment for all.
3. Information is provided to staff, students, and clients on the processes of the appropriate channels if they feel a quality culture is not in place.
4. Festina Lente implements fun and interactive team building days, training, breakfast mornings and opportunities for inter-departmental connection.
5. Festina Lente provides all staff with a winter wellness plan and information on support for both physical and mental health.
6. Festina Lente Mission statement is embedded in its culture which is on display throughout the Organisation.
7. Staff, student, and client feedback is sought and valued and forms part of the agenda for the Academic Committee meeting.

Persons responsible

All Festina Lente staff

Management Team

Board of Directors

Academic Committee

Records to be kept.

Evaluation forms

Minutes of Meetings

1.5. Fundraising Policy

Name: Fundraising Policy Embedding a Quality Culture

Description The purpose of this policy is to enable Festina Lente to have a clear and consistent ethical policy in relation to fundraising. Irrespective of any internal delegation procedures within Festina Lente, the ultimate responsibility in respect of fundraising practices rests with the legally appointed Board of Directors. The Charities Act 2009 provides guidance in relation to this. However, there are other relevant legal principles that the Board and their advisors should ensure are met when deciding whether or not to accept donations. The law requires trustees, in deciding whether to accept or refuse a particular donation, to consider which course will, taking an overall view, be in the charity's best interests. The law allows practical and ethical factors to be taken into account as long as they are ones that are likely to affect the interests of the charity. Given the difficulties of predicting all the various scenarios that may arise, this policy seeks to provide some general guidance.

The overriding principles are that Festina Lente will.

- conduct all fundraising within the law
- and not damage Festina Lente's good name in the pursuit of raising money
- In line with our mission statement fundraising methods will never be allowed to exploit our clients or staff or to compromise their situation or reputation.

Scope: This policy addresses general responsibilities in fundraising as well as specific responsibilities of fundraisers and donors and as related to the use of and accountability of funds.

Statement

1.   Fundraisers shall always act with fairness, honesty integrity and openness.
2.   All fundraising will respect the rights and dignity of donors, beneficiaries and the public.
3.   Fundraising will occur in an honest and truthful manner.
4.   Fundraisers will act with integrity and not misrepresent the charity, its need for funds or how they will be applied.

5. Questions about fundraising activities and fundraising costs will be answered honestly and in a timely manner.

6. Information about the charity's charitable purpose and activities will be made freely available.

7. Charitable donations and gifts will be used for the purposes for which they were donated.

8. Fundraisers shall comply, in all of their activities with Festina Lente's practices and applicable laws and regulations.

9. Fundraises hold themselves accountable to those from whom funds are received. The use of messages or illustrations that takes advantage of human suffering or in any way compromise the dignity of any human being is not permitted. Beneficiaries will not be presented in a disrespectful way in promotional activities.

10. Fundraisers shall not exploit their position for personal gain.

11. Above all else, donors have the right to obtain complete and timely information on how their funds are used.

12. Fundraising activities will not be unreasonably persistent, intrusive or place undue pressure on people to donate. Should someone not wish to donate, or wish to cease making a donation, that decision will be respected.

13. All fundraising activities conducted under the name of Festina Lente will need to be registered with the CEO in Festina Lente.

14. All fundraising activities that use the Festina Lente logo & information will need to be registered with the CEO in Festina Lente.

15. All funds raised will be used for the purpose for which they were raised, and within a reasonable timeframe.

16. Fundraising costs shall always be held to a percentage of revenue which is generally acceptable within the Fundraising profession and by the public. There shall be a proper balance between costs, revenue and quality.

17. A recognised accounting method shall be used to track and control donations. Accurate and timely reports shall be available to the public, including the accounts raised, how it was spent, and the net proportion used for the purpose or cause.

18. Money collected from Fundraising will be counted at all times by two people.

19. The charity will take responsibility for its actions and will be capable of explaining, clarifying and justifying those actions.

20. The charity's trustees and management will explain and account to donors and the public for the charity's actions.

21. The charity will operate in an open, frank and honest way and will ensure that transactions, operations, information and communications are easily understood by donors and the public alike.

22. The charity will clearly identify to donors and the public the cause for which the fundraising is occurring and how donations will and are being used.

23. The charity will provide ways whereby those interested can easily contact the charity.

24. The charity will have a procedure in place to address complaints.

Responsibilities

This policy is applicable throughout Festina Lente, to all individuals who raise funds from private, corporate, public or other sources.

Donor Charter

As a charity seeking donations from the public Festina Lente aim to comply with the Charity Regulator's Charities Governance Code and its Guidelines for Charitable Organisations on Fundraising from the Public and all relevant legislation. Our pledge is to treat our donors with respect, honesty and openness.We commit to being accountable and transparent so that donors and prospective donors can have full confidence in Festina Lente. We promise we will effectively apply your donations to us for their intended purposes.

We commit that you, our donors and prospective donors will:

- Be informed of the organisations mission, and of the way the organisation intends to use donated resources.
- Be informed of the identity of those serving on the organisations governing board, and that the board will exercise prudent judgment in its stewardship responsibilities.
- Have access to the organisation most recent financial statements.
- Be assured you donations will be used for the purposes for which they were given.
- Receive appropriate acknowledgment and recognition.
- Be assured that information about your donation is handled with respect and with confidentiality to the extent provide by law.
- Expect that all relationships with the individuals representing the charity will be dealt with professionally.
- Have easily available the agreed procedures for making and responding to complaints.
- Have the opportunity for any names to be deleted from mailing lists.
- Receive prompt, truthful and forthright answers to questions you might have of the organisation.

Feedback and Complaints Procedure

Festina Lente is committed to ensuring that all our communications and dealings with the public and our supporters are of the highest possible standard. We listen and respond to the views of the public and our supporters so that we can continue to improve. Festina Lente welcomes both positive and negative feedback. Therefore, we aim to ensure that:

- it is as easy as possible to make a complaint.
- we treat as a complaint any clear expression of dissatisfaction with our operations which calls for a response.
- we treat it seriously whether it is made by telephone, letter, fax, email or in person.
- we deal with it quickly and politely.
- we respond accordingly – for example, with an explanation, or an apology where we have got things wrong, and information on any action taken etc.
- we learn from complaints, use them to improve, and monitor them at our Board.

If you do have a complaint about any aspect of our work, you can contact our CEO Jill Carey in writing.

In the first instance, your complaint will be dealt with by our Chief Executive. Please give us as much information as possible and let us know how you would like us to respond to you, providing relevant contact details. Festina Lente offices are open Monday – Friday from 9.00 am to 5 pm

Write to: Jill Carey CEO Email: jillcarey@festinalente.ie

Festina Lente Enterprises CLG, Old Connaught Avenue, Bray, Co Wicklow

- If you complain in person or over the phone, we will try to resolve the issue there and then. Similarly, if you complain by email or in writing we will always acknowledge your complaint within 7 days and do everything we can to resolve it within 21 days. If this is not possible, we will explain why and provide a new deadline.
- If you are not happy with our response, you may get in touch again by writing to the Festina Lente's Chairperson. The Chairperson will ensure that your appeal is considered at Board level and will respond within two weeks of this consideration by Board members. Write to John Green, Chairperson c/o Festina Lente, Old Connaught Road, Bray, Co Wicklow.

The Responsibility of those Managing Fundraising Activities

Fundraisers and Fundraising charities, such as Festina Lente, commit themselves to the highest standards of good practice and to ensuring that all their fundraising activities are respectful, honest, open and legal. Any information obtained in confidence as part of the fundraising process must not be disclosed without express prior consent. Those responsible (or their designate, whether voluntary or paid) must:

- Be responsible for ensuring that fundraisers are aware of and can generally communicate the purpose of the organisation and of the specific fundraising efforts they are involved in.
- Be responsible for ensuring that fundraisers are aware that they must disclose if they are employees of the organisation or third-party agents.
- Provide, where possible, clear and adequate, written or verbal, information to the public about any relevant follow up including telephone procedure.
- Have procedures to ensure that, wherever possible, caution is exercised when soliciting from people who may be considered vulnerable.
- Where events organised in the charity's names are not known by the charity until after the fact, the charity will work with that fundraiser to ensure they are aware of the standards expected and that the fundraiser will apply them to any further events they hold for the charity.
- Where donations are raised through electronic means, example through charities websites, the level of security applied to such websites shall be of a sufficient standard to protect the confidentiality of donor's credit card and other personal details.
- Ensure all public collections have a Garda permit, or where no permit is necessary, permission from the relevant authority (such as for collections in church grounds);
- Be responsible for ensuring that paid fundraisers are remunerated within the minimum wage regulation.
- Ensure that the recruitment process screens potential recruits to indicate suitability (subject to data protection regulations)
- Where remunerated, ensure fundraisers are legally entitled to work in the jurisdiction.
- Be responsible for ensuring that, where paid, all fundraisers and third-party agents are given appropriate contracts, to include a clause stipulating their compliance with the Charity Regulator's Charities Governance Code and its Guidelines for Charitable Organisations on Fundraising from the Public and all relevant legislation that apply.
- Ensure that appropriate training, education and information is available to fundraisers to enable them to perform their roles effectively.
- Comply with the Charities Regulator's Financial Controls Guidelines for Charities.
- Be generally responsible to explain to the public how fundraising is organised and to help educate the public about the realities of resourcing charitable organisations. Where specific questions are received these should be answered openly and honestly. The principle of informing the charity in advance and adhering to these standards will be highlighted as much as possible by the organisation.
- If an appeal is being run for a particular purpose, the board must include a statement indicating what will happen to funds received if the total funds raised are insufficient or exceed the target.

The Conduct of Fundraisers

Fundraisers and fundraising charities commit themselves to the highest standards of good practice and to ensuring that all their fundraising activities are respectful, honest, open and legal. Any information obtained in confidence as part of the fundraising process must not be disclosed without express prior consent.

The following commitments are not exhaustive and may be added to as befits our mission.

Fundraisers and their organisations commit to:

- Always conduct themselves with integrity, honesty and trustworthiness. They will always act openly and in such a manner that donors are not misled.
- Respect the dignity of their profession and ensure that their actions enhance the reputation of themselves and Festina Lente that they represent.
- Act according to the highest standards and visions of Festina Lente and their profession.
- Disclose if they are employees of Festina Lente or third-party agents.
- Not knowingly or recklessly disseminate false or misleading information in the course of their professional duties, nor permit their subordinates to do so.
- Not represent conflicting or competing interests without the consent of Festina Lente and the other parties concerned.
- Not knowingly, recklessly or maliciously injure the professional reputation or practice of other members of the fundraising profession.
- Not knowingly act in a manner inconsistent with these standards, or knowingly cause or permit others to do so.
- Not exploit any relationship with a donor, prospect, volunteer or employee for personal benefit or misuse their authority or office for personal gain.
- Comply with the laws of the land which relate to their professional activities, both in letter and in spirit.
- Advocate adherence within their organisation to all applicable laws and regulations.
- Comply with the Charities Regulator's Financial Controls Guidelines for Charities
- Not engage in activities that harm the Festina Lente, their clients or profession or knowingly bring Festina Lente the profession into disrepute.
- Not engage in activities that conflict with their fiduciary, ethical and legal obligations to Festina Lente, their clients or profession.
- Effectively disclose all potential and actual conflicts of interest; such disclosure does not preclude or imply ethical impropriety.
- Not exploit any relationship with a donor, prospect, volunteer, client or employee for the benefit of Festina Lente.
- Recognize their individual boundaries of professional competence.

- Present and supply products and/or services honestly and without misrepresentation.
- Establish the nature and purpose of any contractual relationship at the outset and be responsive and available to parties before, during and after any sale of materials and/or services.
- Never knowingly infringe the intellectual property rights of other parties.
- Protect the confidentiality of all privileged information relating to Festina Lente/client relationships.
- Never disparage competitors untruthfully. Fundraisers must not denigrate other individuals or organisations.
- Fundraisers must not take advantage of mistakes made by the donor.
- Fundraisers must take all reasonable steps to treat a donor fairly, enabling them to make an informed decision about any donation. This must include taking into account the needs of any potential donor who may be in a vulnerable circumstance or require additional care and support to make an informed decision.
- Fundraisers must not exploit the credulity, lack of knowledge, apparent need for care and support or vulnerable circumstance of any donor at any point in time.
- If a fundraiser knows or has reasonable grounds for believing that an individual lacks capacity to make a decision to donate, a donation must not be taken.
- A donation given by someone who lacked capacity at the time of donating must be returned.
- Fundraisers must not engage in fundraising which:
  - Is an unreasonable intrusion on a person's privacy.
  - Is unreasonably persistent; or
  - Places undue pressure on a person to donate.
- Fundraisers must not continue to ask an individual for support if:
  - that person clearly indicates – by word or gesture – that they do not wish to continue to engage; or
  - they have reasonable grounds for believing, in the course of their engagement with the individual, that they are in vulnerable circumstances which mean they are unable to make an informed decision to donate.
- Fundraisers must not make any deduction from donations received for Festina Lente unless agreed with Festina Lente. Expenses will be met (where previously agreed) by Festina Lente after receipt of the donation.

Policy for the acceptance/refusal of donations

Responsibility for all decisions rests with the legally appointed Board of Directors of Festina Lente.The Board will always endeavour to take all decisions relating to the acceptance/refusal of donations "in the best interests of Festina Lente". The Board will aim to demonstrate that they have acted "in the best interests of

Festina Lente" irrespective of any individual or collective personal interest or predilection, in each and every case. The Board will be particularly careful when refusing donations based solely on the grounds of expediency, as judged by themselves.

The Board will derive no personal benefit (individually or collectively) from donations, loans or other material support offered to Festina Lente.   Where material personal benefit is tied to support, the support, the benefit, or both will be declined. Where the activities of a donor are directly inimical to the objectives of Festina Lente, the agreed policies of Festina Lente, or to the beneficiaries of Festina Lente, the Board may decide to refuse a donation.

Where it can be clearly shown that the cost to Festina Lente of accepting a donation will be greater than the value of the donation itself, the Board may decide to refuse the donation.

Where the offer of support is dependent upon the fulfilment of certain conditions placed upon Festina Lente, the Board have the right and may decide to refuse that support.

Such cases might exist were.

- any condition linked to the support is contrary to the objectives of Festina Lente
- any condition linked to the support is regarded as unreasonable in relation to the nature of the support in terms of its size or impact on the work of Festina Lente
- where conditions linked to the support will divert Festina Lente from pursuing its current objectives, policies or work priorities as a necessary result of the fulfilment of the conditions alone
- where the conditions linked to the support tie the funds and/or property offered to a specific activity, that activity must itself be.
    o charitable in nature
    o within the scope of legitimate action permitted by the charitable objects of Festina Lente and the powers granted to achieve those objects and
    o be practically achievable by Festina Lente
- Where an offer of support is itself dependent upon Festina Lente first spending its own money or resources in order to facilitate the execution of the original offer of support, great care will be taken by the Board to avoid placing charitable assets under undue and inappropriate risk.
- Practical considerations might mean that an otherwise acceptable donation must be refused.
- Such cases might exist:
    o Where support is tied to a particular project or activity which whilst reflecting the charitable objectives of Festina Lente, is nevertheless impractical, given the current standing of the organisation.
    o Where the support is presented in an unconventional manner and the cost of processing the donation exceeds the value of the donation.

- Where the support consists of goods, services or property which Festina Lente cannot lawfully use, convert, exchange or sell in direct support of its charitable objects.
- Where a change in the donor's circumstances prompts a request for the return of all or part of the donation, great care will be exercised by the Board.
- On occasion, the Board may wish to refuse a donation, or delay its acceptance, with a view to inviting the donor to make the gift in a more tax efficient manner.

Relationship with Business & Corporate Partnerships

The purpose of this section is to enable the Board of Directors, staff and management within Festina Lente to make clear and consistent decisions regarding the formation of partnerships with the corporate sector. All our relationships with the corporate sector will need to be guided by our core principles, values and mission. Partnerships with the corporate sector must be formed with great care and due consideration should be given to their potential effects on our staff and clients.

At the same time, opportunities for corporate partnerships are being created by the;
- widening role of the private sector in civil society
- growth in mutually beneficial alliances between the corporate and voluntary sectors
- increasing potential to secure corporate support for our work
- ability of companies to promote our services to a wider audience

Irrespective of any internal delegation procedures within Festina Lente, the ultimate responsibility in respect of corporate partnerships and all activities arising from them rests with the legally appointed Board.
There is no single, specific statute to guide the Board in law in this area. However, there are relevant ethical and other principles that the Board and staff will wish to consider when deciding whether to establish a partnership with a particular company. In addition, the Voluntary Fundraising code arising from the Charities Act 2009 offers high level guidance

Definitions:

For the sake of clarity, the following definitions apply in this paper;

The "Corporate Sector" means any registered business in Ireland or abroad.

"Corporate Partnership" means a public, active and on-going association with a business, which has been solicited either by Festina Lente or the business and has been established for the mutual benefit of the business and Festina Lente.

Establishing a policy on the formation of corporate partnerships.

A clear policy on the formation of corporate partnerships is important for all charitable organisations.
Such a policy, acceptable to all those associated with Festina Lente and agreed formally by the Board will;

- clarify the considerations which the Board see as determining Festina Lente's relations with the private sector
- ensure compliance with legal regulations where appropriate
- clarify the Boards obligations with regard to corporate partnerships
- avoid confusion within Festina Lente as to who has the authority to take decisions in differing circumstances
- help to ensure that decisions are not made on an ad hoc basis but are grounded in the mission and agreed policy objectives of Festina Lente
- provide a clear objective standard against which external regulatory bodies can judge the actions of the charity in cases of potential or actual dispute
- provide a clear, unambiguous policy statement making decisions intelligible, easier to justify and credible to the public at large
- protect the image and reputation of Festina Lente against adverse public reaction from existing or potential supporters

While the policy cannot anticipate every situation it can be used as a reference point, against which decisions can be made in the best interests of Festina Lente.

Policy for the Formation of Corporate Partnerships

- The formation of corporate partnerships is an important element of the fundraising strategy of Festina Lente. Partnerships may be formed because of proactive targeting of specific companies or as a result of companies approaching Festina Lente.
- A corporate partnership is defined as a public, active and on-going association with a business, which has been solicited either by Festina Lente or the business and has been established for the mutual benefit of the business and Festina Lente.
- Responsibility in respect of corporate partnerships and all activities arising from them rests with the legally appointed Board of Directors of Festina Lente.

- All significant new partnerships must be notified and approved by the Board.
- Partnerships with corporate partners may encompass a range of activities such as.
  - Cause related marketing
  - Employee Fundraising
  - Promotion of Festina Lente brand on or with its products
  - Joint or sponsored events
  - Research projects
  - Sponsorship of aspects of Festina Lente's services
  - Sponsorship of Festina Lente publications
  - Gifts in kind, such as equipment, vehicles and the use of premises
- Before forming a partnership with a company an assessment will be made by the Board of Directors of the potential benefit and the risks attached to the association. This assessment will take account of the following.
  - The financial stability of the company. This may involve scrutiny of the company accounts and an assessment of its financial stability.
  - The reputation of the company. If there are any concerns regarding the public image of the company they will be considered with regard to any negative effect this could have on the image of Festina Lente – whether or not a negative public image may be justified.
  - Exclusions. Companies whose business includes the following will be excluded from a partnership with Festina Lente because partnerships with such companies will pose a potentially serious threat to Festina Lente's integrity:
    - Manufacturers of appliances the purpose of which is to inflict torture
    - Producers of pornographic material or material which may be judged to be abusive of individuals
    - Publishers of materials which are clearly inimical to the interests of vulnerable children and adults
    - Companies involved in the nuclear industry
    - Any Companies whose activities are inimical to children and vulnerable adults as decided by the Board from time to time
- In cases where the results of an assessment indicate that it is unclear whether a partnership with the company in question should be pursued the decision will be taken by the Chairperson in consultation with the CEO, who may refer the matter to the full Board.
- Should regulations relating to charity/corporate partnerships change significantly or new legal obligations some into force the CEO will undertake to draw these to the attention of the Board, as appropriate.

2. Quality Assurance

2.1 Documented Approach to Quality Assurance policy

Name   Documented approach to quality assurance procedure.

Scope   This policy describes how Festina Lente Enterprises CLG ensures that the validity of all programme materials and describes the responsibilities of those who develop training materials and those who approve it.

Procedures

1. Proposed Training Programmes are developed in line with QQI Guidelines for Preparing Programme Descriptors.
2. Proposed Training Programmes are discussed and agreed to by the Academic Committee and approved by the Board of Directors prior to submission to QQI for validation.
3. The Festina Lente Enterprises CLGs Academic Committee includes as part of its remit a dual role as a Results Approval Panel and will review and approve assessment results including:

   o Review all Internal Verifications reports and External Authentication Reports
   o Sign off on approved results.
   o Agree to the submission to QQI of final results and request for certification.
   o Identify any issues arising in relation to the results and make recommendations for corrective action.

4. Self-evaluations are carried out annually and feedback reviewed and implemented by the Academic Committee

Persons responsible

Academic Committee

Board of Directors

Records to be kept.

Draft programme prior to submission for validation

Self-evaluation reports

Minutes of Academic Committee Meetings

<p style="text-align:center; color:#36c">2.2 Academic Committee Board meeting report procedure</p>

Name   Board Meeting Monthly Report Procedure

Scope   This policy describes how Festina Lente Enterprises CLG Academic committee reports to the board.

Procedures

1.The Chairperson of the Academic Committee shall prepare an annual report to be presented by the CEO at the board meeting on the following QQI, KWETB and HSE courses including but not limited to:

o   Current course Student Numbers
o   Future Course applicant Numbers
o   If applicable: up to date graduate numbers
o   Completion deadlines for current courses
o   Any Issues that may have arisen.
o   Course Evaluation actions
o   Any other business that may have arisen.

Persons responsible

Academic Committee Chairperson

Records to be kept.

Report

2.3 Review of Quality Assurance procedures and version control

Name   Review of Quality Assurance procedures and version control Procedure

Scope   This procedure outlines how we update the Q.A. manual and version control.

1. The Training coordinator manages the Q.A. procedure ongoing review by forming Academic Committee Subcommittees with relevant personnel when necessary.

2. A new or updated procedure is submitted for approval by the Academic Committee and the board is notified of the change via email using.

3. The date and description of the amendment to the Q.A. manual is noted on the Quality Assurance manual amendment log and the version history on SharePoint.

4. The approved change within the QAM is actioned in SharePoint by the Training coordinator.

Person/s responsible
Training Coordinator

Records to be kept
QAM amendment request form – signed by all person
Quality Assurance manual amendment log.
SharePoint Version control data

Requested by:

Position:

Date:

Page No:	Policy / Procedure No:	Change Requested:

Requested by/Role:		
	Signature:	Date:
Approved by:		
Academic Committee Member	Signature:	Date:
Approved by:		
Academic Committee Chairperson	Signature:	Date:
Actioned by:		
Training Coordinator	Signature:	Date:

4 QAM Amendment Request Form

3. Programmes of Education and Training

3.1.1 Programme Development and Review

Name   Programme Development and Review Procedure

Scope   This sets out the procedure and tasks associated for the development and review of future programmes.

Procedures

1. Festina Lente Enterprises CLG identifies the need for course development through community interest, consulting with key stakeholders and in-depth research of current national course delivery. Before a programme proposal is submitted to the Academic Committee the programme must meet the following criteria.

   - The programme content is in line with Festina Lente Enterprises CLGs Strategic Plan
   - The need for the programme has been identified through liaising with key stakeholders and in-depth research of national course delivery
   - The programme has a clear set of objectives and learning outcomes.
   - The programme is sufficiently resourced.

2. Once the need for a new programme has been identified and a programme proposal has been put forward to include the criteria above the academic committee will review it. The academic committee will have an opportunity to discuss the viability of the course before submitting to the board for approval. Once the proposed programme idea has been approved by the board the proposal can be progressed.

3. The academic committee will appoint the most suitable committee member to write the programme proposal. More than one committee member may be selected to work together on the proposal. Suitability will include experience in submitting proposals, individual skill set, experience etc.

4. The programme proposal must include:

   a. A rationale for programme development including how it fits with the organisations strategic plan.
   b. course learning outcomes
   c. programme format including learner profile, programme level, module descriptors, mode of delivery, staffing allocations and sample timetables.
   d. Programme validation considerations.
   e. Cost Benefit Analysis
   f. Timeframe
   g. Analysis of progression options for learners

  h. Stakeholder feedback; learners, centres with potential learners, staff, external experts, and organisations running similar programmes.

5. A programme development team will then be appointed to complete the course set up and prepare for the validation of new programmes process.
6. The programme is then submitted to QQI for validation.
7. Once live the programme then goes through an evaluation process where stakeholder feedback is sought through discussion and surveys.
8. Evaluation data is then collated into an Evaluation & Sustainability Report.

Persons responsible

Academic Committee

Board of Directors

Programme Development sub-committee.

Records to be kept.

Programme Proposal

Cost Benefit Analysis

Stakeholder feedback

Board Minutes

Name   Learner Admission Policy

Scope   This policy describes the admission process for students for Level 3 Transition Training Programme QQI PG10127, Level 4 K.W.E.T.B. Horsemanship, Level 6 Life and Workplace Coaching QQI PG21153 and Level 6 Therapeutic coaching programme QQI PG15152

Procedures

1. Application forms are available on the Festina Lente Enterprises CLG website along with course content and contact information for level 4-6 courses https://www.festinalente.ie/qqi-courses/. For level 3 Transition Training Programme Transition Training Programme | Festina Lente

2. The learner can apply online, by written application or supported with an application onsite where appropriate.

3. A learner may also be referred to the Level 3 Transition Training Programme QQI PG10127 by the Health Service Executive.

4. All learners must include evidence of eligibility for their chosen course in their application.

5. Applicants will be invited in for an informal interview and orientation week where appropriate for the Level 3 Transition Training Programme QQI PG10127 and Level 4 K.W.E.T.B. Horsemanship programme.

6. Applicants will be informed via email of their acceptance or rejection into their chosen course.

7. Information is provided to the student once acceptance is confirmed. This includes timetables, induction information and other relevant information.

8. Successful applicant information is kept in a softcopy file in line with GDPR procedures.

9. Applicants are required to advise on the online application form if English is their first language. If English is not the applicants first language – an onsite English Test will be required.

Persons responsible

Academic Committee

Course Instructors

Training Coordinator

Records to be kept.

Application forms

Proof of eligibility

Induction forms

Letter of acceptance

Letters of referral /Letters of refusal to offer programme

Name   Learner induction for Level 3

Scope: The purpose of this policy is to ensure that learners in the Level 3 Transition Training Programme QQI PG10127 are given a comprehensive introduction to Festina Lente Enterprises CLG. This induction will ensure that sufficient information is given for a safe and relaxed start to the training programme.

Procedures:

1. New learners will receive an induction pack the first day of arrival. Trainees will collaborate with tutors to complete induction over a two-week period as part of their timetable to ensure information is understood. Approximately 30 minutes per day should be spent on induction, depending on the cognitive abilities of the trainee.

2. We offer a half day induction for the parents/guardians for TTP. The parents of the new students come in and receive all the information about the course.

3. The induction is set out as follows:
    o   People you will meet each day (explanation of the different services within Festina with introduction to member of staff and service user in each area)
    o   The places you will use each day (particular emphasis on the yard, changing rooms, canteen, shop, and gardens.)
    o   A sample weekly timetable
    o   Information on Awards and Modules
    o   Information on Opening/closing times.
    o   Holiday dates
    o   Uniform details and prices
    o   Rules of Festina Lente Enterprises CLG
    o   Information on transport to and from the centre
    o   A copy of our QA manual
    o   Details on training allowance and disability allowance
    o   Information on Individual Training Plans and Progress Reports
    o   Rights and responsibilities
    o   Health and Safety - Including list of Company First Aiders. Fire Procedures (location and use of extinguishers, fire assembly areas)
    o   Complaint's procedure

4. Trainees will be required to sign a form confirming that all areas of induction have been explained to them by staff. A copy of this form to remain on their personal file.

5. The induction pack is then given to trainees to bring home for ongoing reference.
6. Easy-read inductions are provided as appropriate.

Persons responsible

Course Instructors

Training Coordinator

Programme Manager

Records to be kept.

Sample Induction pack updated as required.

Signed induction form.

3.2.3 Induction Level 6 Programmes

Scope: This procedure refers to the orientation procedures for students on the Level 6 Life and Workplace Coaching QQI PG21153 and the Level 6 Therapeutic coaching programme QQI PG15152programme QQI PG15152

Procedures

1. Orientation to the programme and facilities takes place within the first three days during Module 1.
2. On Day 1, an overview is given to the learners of the facilities. General overview of the background and current organisational programmes is given.
3. On Day 2, learners are divided into 3 or 4 groups and a more in-depth tour is facilitated by staff.
4. Learners receive an induction manual prior to their commencement

Persons responsible

Course Administrator

Staff giving the tour.

Records to be kept.

PowerPoint presentation

Induction Manual

Name   Learner progression.

Scope   This policy describes how Festina Lente Enterprises CLG supports learner progression.

Procedures

1. Students are supported throughout their studies by a course mentor, keyworker, or instructor.
2. Individual Training plan (I.T.P.) is completed every year during the 3 years of TTP. I.T.P is discussed quarterly through progress reports meetings. For the transition plan we have 3 meetings: The first for students, instructors, and the training manager. The second for the family, student and HSE. The third for the student, instructor and the HSE.
3. Students are supported to identify and meet individual goals in relation to their studies, further education & training, employment, and personal and professional development.
4. Students work closely with the keyworker/mentors in developing Individual Training Plans, Progress Reports and Transition Plans for Level 3 Transition Training Programme QQI PG10127.
5. A transition plan is developed with the student in their final year of study with Festina Lente Enterprises CLG for Level 3 Transition Training Programme QQI PG10127. This plan identifies the learner's next steps, and the supports needed to ensure success.
6. The transition plan is reviewed with the student quarterly for Level 3 Transition Training Programme QQI PG10127.
7.

Persons responsible

Academic Committee

Course Instructors

Training Coordinator

Records to be kept.

Progress reports

Transition Plans

Individual Training Plans

4. Staff Recruitment and Development

4.1 Staff Recruitment

Name   Staff Development: Recruitment and Selection

Scope   This procedure refers to the screening, recruitment, and selection of staff.

Procedures

1. The nature of the vacancy to be filled is clearly defined together with a revised job and person specification.

2. The person specification identifying selection criteria for the post.

3. The job vacancy is advertised on appropriate websites including the Festina Lente Enterprises CLG website.

4. Applications will be taken through the Festina Lente Enterprises CLG online application form.

5. Candidates will be shortlisted against the agreed selection criteria.

6. Shortlisting document will be signed off by the HR Manager and kept on file.

7. Suitable candidates will be invited for interview and are required to bring a copy of relevant qualifications, completed Garda vetting forms and photo identification. If unsuccessful all documentation will be disposed of in line with Festina Lente' Enterprises CLG s GDPR Policy.

8. Core interview questions are agreed by the interview panel based on the selection criteria.

9. Learners from the Level 3 Transition Training Programme QQI PG10127 will be included as part of the interview panel. Feedback from the learner's is taken into the decision-making process.

10. Interviews are scored individually by the interview panel using the scoring system and are then discussed.

11. All relevant information and learner feedback is taken into consideration before any decision is made.

12. Applicants will be invited for a second interview where appropriate.

13. All applicants will be informed of the outcome of their interview.

Persons Responsible

Human Resource Manager

Interview Panel

Records to be kept.

Application forms

Shortlisting document

Interview score sheets

4.2.1 Staff Meetings

Name   Staff Communication meeting procedure.

Scope   This procedure refers to the meetings that are held between Managers and staff within the Level 3 Transition Training Programme QQI PG10127

Procedures

1. An agenda is circulated in advance and includes the following areas: Programme Weekly Plan, Human Resources, Health & Safety, Assessments & QQI, Meetings, Work Experience, and Update on individual Learner's.
2. Minutes of meetings are written up and circulated to staff.

Persons Responsible

Training Manager

Records to be kept.

Meeting agendas

Meeting minutes

4.2.2 Staff Management Meetings

Name   Staff Communication: Management Team Meetings

Scope   This procedure refers to monthly Management Team Meetings.

Procedures

1. An agenda is circulated in advance and includes amongst other areas an update on key areas within the learning programmes.
2. Minutes of meetings are written up and circulated to the managers.
3. Feedback from management meetings is provided at weekly team meetings as appropriate.

Persons Responsible

Chief Executive Officer

Records to be kept.

Meeting agendas

Minutes of meeting

4.2.3 Staff Self-Monitoring

Name   Staff Communication: Internal Self-Monitoring

Scope   This procedure refers to the continuous self-monitoring of all academic programmes within Festina Lente Enterprises CLG and identifies areas that are delivering quality and areas that need to be developed further.

Procedures

1. Learner feedback and evaluations are completed after each module for Level 6 Life and Workplace Coaching QQI PG21153 and the Level 6 Therapeutic coaching programme QQI PG15152programmes, and quarterly and annually for Level 3 Transition Training Programme QQI Programme code PG10127.
2. The Academic Committee annually review certification ratings.
3. Internal Verification of Results process is completed and reviewed by relevant Instructors and Academic Committee
4. Peer Reviews and Code of Conduct Observations are completed with teaching instructors on an annual basis.
5. At the end of each week TTP students have a meeting to evaluate the week.

Persons Responsible

Training Manager

Academic Committee

Course Instructors

Records to be kept

Learner Evaluation form

Certificate of Results

Internal Verification Report

Peer Review

Code of Conduct

4.2.4 Staff Self Evaluation

Name   Staff Communication: Self-evaluation & Review

Scope   This procedure refers to the evaluation, monitoring, review, and development of all academic programmes in Festina Lente Enterprises CLG through observation, feedback, and reflection.

Procedures

1. Instructors complete an annual self-evaluation review.
2. Instructors develop an action plan based on the outcomes of the self-evaluation report.
3. The Academic Committee review the self-evaluation report and action plan.
4. Programme staff engage in supervision meeting's every six weeks which provides a space for reflection.
5. Programme staff of Level 3 Transition Training Programme QQI PG10127 will complete an annual peer review and code of conduct observation.

Persons Responsible

Academic Committee

Training Manager

Course Instructor's

Records to be kept

Supervision Reports

Code of conduct

Peer review report

Self-evaluation report

4.3.1 Staff Induction

Name   Staff Development: Induction

Scope   This procedure refers to the one-month induction programme for newly appointed staff.

Procedures

1. All new staff will report to Human Resources on the first day of employment. This meeting will involve an overview of the Induction Procedure and a breakdown of the Employee Induction Form. This form has three parts to be completed within the first month of employment.
2. All parts of the Employee Induction form will be signed and dated by both the new employee and staff completing the induction.
3. The Human Resource Manager will inform the employee of Festina Lente Enterprises CLG Human Resource Policies and Procedures as included in Part 1 of the form.
4. The employee will complete a Health & Safety Induction with the Health & Safety Officer within the first week of employment as outlined in Part 1 of the Employee Induction Document.
5. The employee will be given a tour of the grounds and introduced to co-workers and complete job shadowing with an assigned staff member.
6. The line manager will meet with the employee within the first week of employment and give an overview of the organisation and their role within the organisation as outlined in Part 2 of the Employee Induction form. A review of the first week including ensuring all necessary employee items have been issued and risk assessments conducted will also take place during this meeting.
7. The line manager will meet with the employee at the end of their first month of employment. Main duties, responsibilities and areas requiring support will be outlined and targets set. A date will be agreed for the employee's first probation meeting.
8. The signed Employee induction form will be kept on file for Human Resources.
9. A presentation on the operation of the Q.A. manual is presented to the employee.

Person Responsible

Human Resource Manager

Line Manager

Records to be kept.

Employee Induction Form

4.3.2 Staff Probation Review

Name Staff Development: Probationary Review (PR)

Scope This procedure refers to the PR process for newly appointed staff which takes place for the first nine months of an employee's contract. A probationary period can be extended where appropriate but will not extend past a 12-month period.

Procedures

1. The newly appointed staff member is invited to a PR meeting within 3 months of their start date.
2. Performance related matters where necessary can be dealt with through the 3-month induction process.
3. Serious performance related matters may, where necessary, be dealt with through the Disciplinary Procedures.
4. The staff member is given the PR form, and a suitable time and date is agreed for the first probationary review meeting.
5. Meeting takes places with all parts of the PR form discussed.
6. Minutes of meetings by way of the PR form should be typed up within one week of the meeting taking place in draft and sent to the staff member for agreement.
7. Signed copy to be kept on the staff member's file.
8. A minimum of two Probationary review meetings should take place before the end of the probationary period, at which stage the staff should be issued with a letter of permanency.
9. The Human Resources manager will oversee the timeline for PR meetings.

Persons responsible

Line Manager

HR Manager

Newly appointed staff member

Records to be kept.

PR Meeting form

Letter of permanency

4.3.4 Staff Performance Review

Name   Staff Development: Performance Management Review & Supervision

Scope   This procedure refers to the ongoing review of staff performance and career development.

Procedures

1. Employees will be provided with details of the performance standards necessary in their job and the supervision guidelines and principals used in Festina Lente Enterprises CLG.
2. Meetings will be held every six weeks with programme staff to review staff development, targets, learner goals, and staff training needs, annual leave requests, personal reflection, and manager feedback.
3. Meeting times will be given in advance and should only be rescheduled in unforeseen circumstances.

Persons responsible

Training Manager

HR Manager

Records to be kept.

Supervision Report Forms

Performance Management Meeting minutes

Guidelines for Supervision

4.3.5 Staff Training

Name   Staff Development: Staff Training and Development

Scope   This procedure refers to the ongoing development of staff through internal and external training.

Procedures

1. All staff must complete and attend mandatory training including Safeguarding Vulnerable Adults, Children's First and Manual Handling Training
2. Managers will review each individual role for additional training needs and consult with staff as appropriate.
3. Staff are encouraged through Performance Management Review and Supervision meetings to identify areas for development and research training opportunities.
4. Staff are supported to apply for financial support for training where appropriate using the Staff Training Application form which can be found in the Festina Lente Enterprises CLG Company Handbook.

Persons responsible

Manager

HR Manager

CEO

Employee

Records to be kept.

Supervision Report Forms

Performance Management Meeting minutes

Training Certificate's

Staff Training Application Forms

5. Teaching and Learning

5.1 Student Work Experience Policy

Name   Student Work Experience

Scope   This policy refers to how students are supported to identify, apply, and complete relevant work experience placements to benefit their learning in the Level 3 Transition Training Programme QQI PG10127.

Procedures

1. Learners are encouraged to access work experience opportunities to support their individual learning and increase responsibility.
2. Learners are supported by their course instructors to research appropriate work experience placements based on their interests and long-term goals.
3. Learners are supported to create a C.V and cover letter to apply for work experience placements.
4. On acceptance of a work experience placement the course instructor will meet with the work experience provider to complete the Work Experience information form.
5. An agreement of daily tasks, hours and responsibilities is agreed.
6. All relevant documentation is provided to the Employer including public liability and next of kin.
7. The employer is asked to complete a review form of the students' performance.
8. The employer, student and instructor conduct review meeting where relevant feedback is given to the student.
9. In the instance a work experience placement is not suitable the instructor will support the learner to apply for an alternative placement.
10. The supported employment specialist helps the instructor of the TTP students to find suitable work experience.

Persons responsible

Programme Instructor

Day Service Manager

Supported Employment Specialist

Student

Records to be kept (softcopy)

Work Experience Information Form / Work Experience Review Form

Weekly Student Meetings Minutes

Person Centred Plans

5.2 Appeals Procedure

Name   Appeals Procedure – Assignment /Assessment

Purpose: To outline the process for learners to appeal an assessment /assignment process such that they believe that the assessment/assignment conditions and/or process conditions negatively affected the assessment/assignment performance.

Scope: This procedure relates to all assessment/assignments and includes learners from Level 3 Transition Training Programme QQI Programme code PG10127 and Level 6 Special Purpose Award in Life and Workplace Coaching and the Level 6 Therapeutic coaching programme QQI PG15152. Programmes

1. Learners wishing to appeal an assessment/assignment or result must contact the Training coordinator within 5 days of receiving the approved results. Appeal requests should be made in writing via email to trainingadmin@festinalente.ie

2. The learner can appeal their result if they

3. perceive there to be irregularities/inequality in its implementation or the Assessment Process or

4. The assessment results.

5. The Training coordinator will acknowledge a learner appeal within three working days via email by sending a google docs link to appeals form for completion. The student will give an outline of the circumstances which forms the basis of the appeal. Only the previously submitted work may be considered for appeal is that which has already been presented for assessment.

6. The Training coordinator will inform the Academic Committee via email with the relevant programme assignment/assessment brief.

7. The learner will be informed of the outcome of the appeals process via a written response which will be given to the learner within 1 month of receipt of appeal form.

8. The principles of assessment/assignment which apply are based on the Quality Assuring Assessment- Guidelines for Providers (Version 2 - revised 2018*)

9. A nominated member of the Academic Committee and the internal marker/Verifier will conduct the review. (Not the individual/assessor who made the original assessment decision.)

10. A record of the appeal and its outcome will be noted in the minutes of the Academic Committee meeting under agenda item 'Student complaints received.

Persons responsible: Training coordinator/ Academic Committee/ Nominated Academic Committee member.

Records to be kept Appeal request form /Acknowledgement of appeal/ Response to learner/ Minutes of Academic Committee Meeting

5.2.1 Re-check Procedure

Name: Re-check Procedure Component

Purpose: To outline the process for learners requesting a re-check and the procedures involved.

Scope: This procedure outlines the process involved in requesting a re-check on the recording and combination of component scores for a module and or stage.

Recheck: "The administrative operation of checking (again) the recording and combination of component scores for a module or stage." (Ref; QQI Assessments and Standards, Revised 2013, 4.10.3)

1.   A learner may request a recheck within five working days after provisional summative assessment results have been issued to learners.

2.   Grounds for a re-check include a belief that there was an error in the calculation of the learner's grade relating to an assessment

3.   The learner should submit this request in writing via email to the Training coordinator, qqi.admin@festinalente.ie and include subject title "Request for Recheck. (Please ensure to request a read receipt on your email.)

4.   Once received the Training coordinator will notify the Assessor and the Academic Committee of the learner request for a recheck

5.   The recheck process is conducted within five working days by a nominated member of the Academic Committee.

6.   Marks are checked and totalled to determine where marks should be allocated and check if marks awarded are calculated correctly for the assessment in question.

7.   Where a recheck results in a change of mark/grade the nominated member of the Academic Committee notifies the Chair of the Academic Committee and the original assessor for the purposes of amending the learner's mark/grade accordingly including any necessary change in an award classification.

8.   The learner is informed in writing of the outcome of the recheck within two working days.

9.   The External Authenticator are also informed of the outcome of the recheck.

Persons responsible:

Training coordinator

Academic Committee

Nominated Academic Committee member.

Records to be kept:

Learner written request for re-check.

Acknowledgement of re-check

Response to learner

Minutes of Academic Committee Meeting

Written correspondence notifying External Authenticator.

5.2.2 Review Procedure

Name   Review Procedure

Scope   This procedure outlines the procedure for requesting a review.

Purpose: To outline the review procedure

Review: "The re-consideration of the assessment decision, either by the original assessor or by other competent persons." (Ref: QQI Assessments and Standards, Revised 2013, 4.10.3)

1.   A learner may request a review within five working days after ratified results have been issued to learners.

2.   The learner should submit this request in writing via email to the Training coordinator, qqi.admin@festinalente.ie stating the grounds that the review is being sought, and provide evidence in support of the request

3.   The Training coordinator will notify the Chair of the Academic Committee and the original assessor to determine whether there are grounds for a review

4.   If a review is approved, the Chairperson of the Academic Committee appoints an independent assessor who was not involved in the initial assessment to conduct the review within ten working days.

5.   The decision of the independent assessor will supersede the original assessor's judgement, and the learner will be informed in writing of the outcome of the review.

6.   Where a review results in a change of mark, the Training coordinator notifies the relevant Instructor for the purposes of amending the learners mark accordingly including any necessary change in an award classification.

7.   The learner may appeal the decision under the grounds for appeals.

8.   The External Authenticator are also informed of the outcome of the review.

Persons responsible:

Training coordinator Academic Committee   Nominated Academic Committee member.

Records to be kept:

Learner written request for review   Response to learner.

Acknowledgement of review   Minutes of Academic Committee Meeting

Written correspondence notifying External Authenticator.

5.2.3 Non-Academic Complaints and Appeals

Name: Non-Academic Complaints and Appeals Procedure

Purpose: To outline the procedure for non-academic related complaints and appeals.

Scope: This procedure outlines the process involved in making a complaint that is not related to academic assessment. These complaints refer to student's welfare, safety, and security.

- If a learner has a concern or issue during their time with Festina Lente Enterprises CLG they should notify their keyworker or course tutor as soon as possible.
- If the learner is not satisfied with the outcome of this discussion or they believe an informal resolution is not a suitable means of addressing their concerns a formal complaint can be made. Choosing to bypass the informal process will not reflect on the person concerned.
- Formal complaints should be made in writing. The complaint should be confined to precise details of the cause of concern including the dates of such incidents, any evidence relating to the concern and any witnesses present.
- Formal complaints should be addressed to Training coordinator amandacoffey@festinalente.ie or the relevant programme manager requesting a read receipt.
- The complaint will be acknowledged within 48 hours after submission (excluding weekends/bank holidays where the learner would receive an acknowledgement the next working day after the weekend/bank holiday).
- The learner will receive confirmation of receipt with an outline of the next steps and estimated time limit for investigation of no more than fifteen working days.
- On receipt of a formal complaint the Training Coordinator will designate an investigatory panel to review all details of the complaint.
- The investigatory panel will be selected depending on the nature of the complaint and will be ideally placed to hear a specific complaint, depending on the nature of the complaint.
- Concluding the complaint investigation, the learner will receive a written response from the investigatory panel detailing the measures taken and what actions, if any, are to be taken.
- If the learner feels the complaint was not correctly addressed, they can appeal the decision within five working days of the notification of the outcome of the process.
- The reason for the appeal should be outlined in writing and addressed to Dr Jill Carey, C.E.O, Jillcarey@festinalente.ie (please request a read receipt). You will be notified of the outcome of the appeal within seven working days.

Persons responsible:

Transition Training Programme Facilitator

Training coordinator

C.E.O

Nominated Investigatory Panel

Records to be kept:

Record of complaint

All correspondence relating to complaint.

Investigation notes

Letter outlining outcome of complaint.

Appeals correspondence.

Letter outlining outcome of appeals process.

5.4 Learning Environment

Name   Learning environment.

Scope   This procedure refers to all learning environments on site and within the community used by Festina Lente Enterprises CLG for students of the Level 3 Transition Training Programme QQI PG10127.

Procedures

1.   Individual learning needs of learners are identified at referral from the HSE or during orientation and the appropriate recourses and adaptions are made to learning environments.

2.   Learners can discuss any learning environmental need/issue with their Keyworker /mentor at any time. Structured opportunities occur during their I.T.P. and bimonthly progress report meetings.

3.   Learners can also bring any concerns to their student representative for the student council.

4.   Learner feedback is gathered twice a year regarding all learning facilities and identifies any changes required.

5.   Staff can also request improvements of learning environments via Academic Committee, supervision or through budget request.

6.   Festina Lente Enterprises CLG works in partnership with guardians and operates an open-door policy where any issues can be brought to the attention of staff or management and will be raised at the Academic committee.

7.   Learning environments adapt and change in line with the seasons and optimise outdoor learning when possible, using the Equestrian Learning Centre and walled garden for teaching a wide variety of subjects. Classrooms are suitably cooled and heated as appropriate to the weather conditions with both natural and artificial lighting and meet the necessary requirements for room ventilation, occupancy levels in line with current social distancing requirements.

8.   While classrooms in the existing premises are limited in size, they are equipped with interactive white boards, and allow for movement, both individual and group interaction.

9.   Computer equipment is regularly checked and fitted with up-to-date software

10.   Use of suitable learning environment facilities within the community e.g., sports, community centres encourage community involvement and broaden the range of activities that can be taught such as cookery, exercise, specialist skills and Health Related Fitness Modules. These are regularly reviewed as per 2-6 above.

11. All learning environments provide a suitable place for the learner to easily take a break if stressed or overwhelmed.

12. All learning environments to have access to suitable sanitary facilities.

Persons Responsible

Transition Training Programme Instructor

Transition Training programme Team Lead

Day Service Manager

Academic committee

Records to be kept (softcopy)

Minutes of internal staff meetings

Minutes of Academic Committee Meetings

Minutes of student council

Family contact forms

ITP and Progress reports

Minutes of Weekly student meetings

6. Assessment of Learners

6.1 Assessment of Learning achievement

Name   Learner recognition.

Scope   This policy describes how Festina Lente recognises learner achievement across all programmes.

Procedures

1. Festina Lente provides a personal 1-1 approach in delivering assessment results with tailored feedback to the individual.
2. Festina Lente celebrates learner achievement through graduation, awards ceremonies, and social media posts where appropriate.

Persons responsible

Course facilitators

Training Administrator

Records to be kept.

Provisional results

Certificates of completion

External Authenticator Feedback form

7. Supports for Learners

7.1.1 Student Progress Reports

Name   Progress Reports

Scope   This procedure describes the timing and implementation of Progress Reports for students in the Level 3 Transition Training Programme QQI PG10127

Procedures

1. The Progress Report form template is examined at the start of each academic year at the team meetings and/or by the Academic Committee.
2. Further amendments to the form can be made by consultation with the Day Service Manager and at Departmental Team Meeting.
3. Each student has an initial ITP Meeting at the end of September.
4. Progress Report Forms are to be completed every 2 months thereafter with individual students and their Keyworker.
5. Once completed, the form is typed, and a copy sent to:
   - o The student and/or parents/guardian
   - o The Dat service
   - o Saved in the Students folder on shared staff department files.
   - o Printed and put in their individual folder.
6. Goals set should be measured and given a timeline for review.

Persons Responsible

Keyworker/Mentor

Training Manager

Records to be kept.

Progress Report

7.1.2 Individual Training Plan

Name   Individual Training Plan

Scope   This procedure describes the individual training plans.

Procedures

1. Individual Training Plans are held within three months of each student's commencement on the programme.

2. One or more meetings are held with the student such that they have a clear understanding of the purpose and process.

3. Key people are identified by the learner and encouraged to engage and support with the process including the support from their keyworker.

4. Information is gathered by the learner and their keyworker, and they are supported to identify goals and develop an action plan for achieving these goals.

5. Goals identified are broken down and form the learner's individual progress report.

6. Learner support needs and resources required are identified in the Individual Training Plan.

7. The learner is supported to set out a key action plan including short, medium, and long-term goals. A strategy is then developed on how the learner can achieve these goals and the supports and resources required.

8. The learner is supported to engage in reflective practice through meetings with their mentor's and keyworkers.

9. Individual Training Plans are reviewed formally on an annual basis. Learners will also engage in 1-1 meetings with their keyworkers to track their progress through a progress report every eight weeks.

10. Learners are encouraged to give feedback on their experience of the person-centred planning process informally and formally through annual evaluations.

11. Students are given the choice of engaging with the Individual Training Planning process. Where the student does not choose to engage with this process, the tutors involved will identify specific supports that may be necessary for full engagement in the programme in consultation with the learner.

Persons Responsible

Training Manager /Programme Instructors

Records to be kept.

ITP Individual Person-centered Planning Document/ Evaluation Report's

Progress Reports / Family contact forms

7.1.3 Keyworker meeting

Name   Keyworker meetings.

Scope   This procedure refers to the Keyworker processes in Festina Lente which support learners in a person-centred way to actively engage in the programme and to reach their individual goals.

Procedures

1. All learners on the QQI Level 3 Transition Training Programme QQI PG10127 have an allocated keyworker to whom they can bring any issues and who will provide necessary support.
2. Learners and keyworkers collaborate and create an Individual Training Plan for each learner.
3. This plan is presented to parents/ guardians and Key worker.
4. Progress Reports meetings are held every three months between the keyworker and learner. Learning and personal goals are reviewed at this meeting. With the learner's permission these reports are shared with parents where appropriate.
5. Learners can arrange an additional 1: 1 meeting with their key worker at any time.
6. A learner can request a change of key worker. All requests will be taken into consideration by the Training Manager.

Persons Responsible

Programme Instructors
Training Manager

Records to be kept
Individual Training Plans
Progress Reports

7.1.4 Evaluation Level 6

Name   Evaluation Procedures

Scope   These procedures refer to the evaluation procedures for Level 6 Special Purpose Award in Life and Workplace Coaching and the Level 6 Therapeutic coaching programme QQI PG15152.

Procedures

1. An evaluation of each of the 6 modules is held on day 3 of each module.
2. The evaluation is done:
    a. via on-line survey
    b. facilitated group discussion.
3. Evaluation is facilitated by the Training Coordinator.
4. Results of the questionnaire are reviewed by the Academic Committee at each meeting.
5. Corrective action as appropriate is taken following results of the evaluation.

Persons responsible

Training Coordinator

Academic Committee

Records to be kept.

Minutes of Academic Committee Meeting

Evaluations

7.1.5 Evaluation Review Final

Name   Annual Surveys & Evaluation of Modules

Scope   This procedure refers to the process of reviewing the feedback from learners from all programmes i.e., Level 3 Transition Training Programme QQI Programme code PG10127, Level 6 Special Purpose Award in Life and Workplace Coaching and the Level 6 Therapeutic coaching programme QQI PG15152 programme.

Procedures

1. A group evaluation meeting is scheduled annually at the end of the academic year by all teaching staff.
2. Feedback on service supports, QQI modules, educational environment, educational resources information & communication, programme facilitators and educational activities is collated.
3. Feedback is collated into an Annual Evaluation with action points.
4. The Annual Evaluation is circulated to the Academic Committee

Persons Responsible

Training Manager

Programme Instructor's

Academic Committee

Records to be kept.

Evaluation Reports

Academic Committee minutes

Quarterly Service Review Minutes.

Weekly Student Meeting Minutes.

7.2 Pastoral Care

Name   Pastoral Care

Scope   This procedure describes the range of pastoral care supports that are provided to learners by both course tutors and external sources as may be required. This procedure refers to learners in the Level 3 Transition Training Programme QQI PG10127.

Procedures

1. Learners are provided with regular meetings with their instructor or keyworker. Additional meetings can be requested as needed.
2. Pastoral care needs are identified through several different ways including information collected at the referral stage, ITP process, key working/mentoring process, sudden change of life circumstances, learners' concerns, parental concerns and/or staff concerns.
3. Where such a concern is raised, this is discussed either through the weekly team meetings or between a Programme Instructor and Training Manager. Where appropriate the person raising the concern may be invited to attend the meeting including the leaners as may be appropriate.
4. A meeting is held with the learner to discuss the emerging issue and explore supports that can be provided which may be internal or external to the Organisation.
5. A referral may be made to the Behaviour Support Coordinator or Designated Safeguarding Officer where appropriate.
6. A written account of all meetings to include the identified pastoral support needs and the action taken is recorded by the keyworker/instructor.
7. A review of the supports is included in the weekly team meetings or between the Programme Instructor and/or Learner and/or Manager.
8. Ongoing needs and supports monitored in monthly progress report meetings.

Persons Responsible

Programme Instructors

Keyworkers/Mentors

Training Manager

Records to be kept.

Pastoral Care Plan

Referral forms

7.3.1 Learner Support Meetings

Name   Staff Meetings

Scope   This procedure refers to the process of ensuring Festina Lente supports its learners in the Level 3 Transition Training Programme QQI PG10127 on an ongoing basis through the weekly staff meetings.

Procedures

1. An agenda is devised to address ongoing support for learners which includes QQI updates, Assessments, and an individual update on learners where appropriate.
2. Action points are developed and reviewed at the following meeting.
3. Staff meetings take place weekly, and minutes are sent to all staff in attendance and the Chief Executive Officer.

Persons Responsible

Training Manager

Programme Instructor's

Records to be kept.

Staff Meeting Minutes

7.3.2 Student Council Election

Name   Election to the Student Council

Scope   This procedure describes the process by which learners from QQI Level 3 Transition Training Programme QQI PG10127 can join or be represented on the student council and the operation of same.

Procedures

1. Learners are educated by the student council coordinating staff members at the beginning of each semester on the functions and purpose of a student council.
2. Learners are encouraged to nominate themselves for election from the QQI Level3 Transition Training Programme QQI PG10127 to the council and represent their peers at an organizational level.
3. Visual Cues are in key areas around the campus identifying the council representatives and how to engage with them.
4. Council members will elect students to the following roles: chair, secretary, treasurer, media, and ordinary members. These positions will be held for the academic year.
5. The council meets every 6 weeks to discuss relevant issues.
6. Students agree to a council manifesto outlining their function, roles, and job expectations.
7. Feedback is received from learners through a combination of varied communication modes i.e., oral feedback from trainee meetings, suggestions boxes and online surveys.
8. Student council nominated representative meets with the Academic Committee every three months and is supported by the independent staff member to relay the student issues, concerns, and suggestions.
9. The response of the Academic Committee will be relayed to student council members and agreed actions taken.

Persons Responsible

Student Council Members

Student Council Coordinating Staff Member

Training Manager

Records to be kept.

Council Meeting Minutes

7.3.3 Student Council Formation

Name   Student Council Formation

Scope   This procedure describes the process by which learners can join or be represented on the student council.

Procedures

1. Festina Lente operates a student council for those learners of the Level 3 Major Award in Transition Training Programme PG10127 at the beginning of each academic calendar year.
2. Learners are educated by the student council coordinating staff members at the beginning of each academic year, on the functions and purpose of a student council.
3. Learners are encouraged to nominate themselves for election to the council and to represent their peers at an organisational level.
4. Elections are held each September and organised by the coordinating staff member.
5. The candidate with the most peer votes is elected to a place on the student council.
6. The student council holds their position for the academic calendar year.
7. A maximum of two successive years can be held at a time by each council member, however they must be reelected by vote the second year also.

Persons Responsible

Student Council Members

Student Council Coordinating Staff Member (Staff in Charge)

Training Manager

Records to be kept.

Meeting Minutes

Records of voting

Student Council Terms of Reference

7.3.4 Student Council Function

Name   Student Council Function

Scope   This procedure describes the functionalities of the Student Council

Procedures

1. The council meets every 6 weeks. A date is agreed by all members a minimum of one week in advance of the planned meeting.
2. The staff in charge is responsible for the co-ordination of the group and provides support to the council in conducting meetings and agendas as needed.
3. The staff in charge helps the students set out their mandate and what they hope to achieve in their year on council.
4. Student council members actively seek feedback from their peers. This should be included in the weekly student meeting agenda.
5. Coordinating staff should liaise and feedback information from the student council at relevant staff meetings.
6. Minutes of meetings will be posted on Noticeboards in all communal areas for students and staff to see.
7. The Level 6 Life and Workplace Coaching QQI PG21153 and the Level 6 Therapeutic coaching QQI PG15152 programmes group is given the optional choice to nominate one person to liaise with the Course Coordinator.

Persons Responsible

Student Council Members

Student Council Coordinating Staff Member (Staff in Charge)

Training Manager

Records to be kept.

Student Council Meeting Minutes

7.3.5 Learner Representation level 6

Name   Learners Representatives:

Level 6 Life and Workplace Coaching QQI PG21153 and the Level 6 Therapeutic coaching QQI PG15152 programme

Scope   This procedure refers to the mechanisms for learners to make representation about matters of general concern to the group.

Procedures

1. The learner group does not exceed thirteen learners at any given time.
2. Learners are encouraged to give feedback on the course as it relates to their expectations and needs across each module both individually and as a group.
3. Learners are also given the option to elect one person to consult with the Course administrator relating to any aspect of the course.
4. Response time to queries is one week.

Persons responsible

Course administrator

Course coordinator

Records to be kept.

Copy of emails

7.4 Career Planning

Name   Career Planning

Scope   This procedure refers to the process for final year students of the Level 3 Transition Training Programme QQI Programme code PG10127 aimed to supporting learners to make informed choices about further education and careers.

Procedures

1. QQI Work experience modules form part of Level 3 Transition Training Programme PG10127
2. Suitable work experiences are found, and learners are supported to complete a variety of placements.
3. QQI career modules (Preparation for work, Career Preparation) are completed as part of the L3 programme.
4. Mock interviews are conducted by local Career Guidance Service.
5. Learners attend Open Days in colleges to learn about transfer and progression choices to programmes within the National Framework of Qualifications.
6. Learners are aided in the application process and staff consult with colleges where necessary about additional support needs.

Persons responsible

Programme Instructors

Training Manager

Supported Employment coordinator

Records to be kept

QQI Modules record of results

Transfer and Progression Plan

Copy of application for further training

8. Information and Data Management

8.1 Data Management Procedure

Name   Data Management

Scope   This procedure outlines how Festina Lente stores data in line with GDPR Policy

Procedures

1. Keeping client, staff, and other personal information secure.

2. Keep all passwords secure – change regularly when prompted, no sharing of passwords.

3. To Lock (ctrl, alt, Del) or log off computers when away from desks.

4. Dispose of confidential paper waste securely by shredding.

5. Securely store hard copy personal information when it is not being used.

6. To prevent virus attacks by taking care when opening email and attachments or visiting new websites.

7. Ensure computer screens are sited away from the view of others to prevent unlawful disclosure of sensitive information.

8. Portable data storage devices – e.g., laptops, USB, phones etc. must be encrypted if it holds personal or sensitive data.

9. Records should be updated promptly to ensure accuracy, change of addresses, etc. You should only be viewing client or staff data for a legitimate purpose. Any exchange of this information should be authorised and, on a need, to know basis. This information should be exchanged securely.

10. To ensure that sensitive conversations are not overheard by others. That when leaving answer phone messages, you should not disclose sensitive information just leave your name and contact details. Limit the amount of personal information given out over the telephone and to follow up with written confirmation, if necessary.

11. That clients, staff and other individuals have a right to access the personal information held by the Company under the Data Protection Act, subject to certain conditions. Requests should be sent to the Data Protection Officer

12. All unauthorised disclosures or near misses relating to the above should be immediately reported to the Data Protection Officer. The parties involved/affected should also be informed within 72 hours after breach.

Persons responsible

Data Protection Officer

All Festina Lente Staff

Records to be kept.

Signed staff handbook. / Signed student induction

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8.2 Data Protection Officer procedure

Name   Data Protection Officer

Scope   This procedure outlines the role of the Data Protection Officer in ensuring organisational GDPR compliance.

Procedures

1. To ensure that the organisation processes personal data of students, staff, clients and any other individual in compliance with the applicable data protection rules.
2. To conduct an annual review of all records held on file and dispose of records in line with GDPR policy.
3. To support staff in executing the Organisational GDPR policy.
4. To respond to any breaches of GDPR policies and document accordingly.
5. To ensure staff and students are informed of their rights and responsibilities under Festina Lente Enterprises CLG GDPR policy.

Persons responsible

Data Protection Officer

Board of Governance

All staff employed by Festina Lente

Records to be kept

Signed staff handbook.

Signed student induction.

8.3 Data Protection Procedure re: GDPR

Name   Data protection relating to GDPR (The General Data Protection Regulation)

Scope   This procedure outlines how records are to be stored in line with current GDPR rules and regulations

Clarification: What Data does GDPR protect? GDPR protects the following Data: Basic identity information such as name, address and ID numbers, Web data such as location, IP address, cookie data and RFID tags, Health and genetic data, Biometric data, Racial or ethnic data, Political opinions Sexual orientation. Festina Lente ensures this GDPR protection for our clients/students/staff and vendors by:

1. Putting in place secure data storage softcopy filing systems on separate network drives relating to
    1.1. H.R. including application form, references, performance reviews, all correspondence
    1.2. QQI student folders (Application forms, all correspondence, learner records, assessments, examinations, and results). files are kept on a private network drive (W)which only the CEO and the Training coordinator have access to.
    1.3. Vendors and customers – Our Sage account system and our accounts network (T) drive can only be accessed by our financial controller and the accounts assistants.
    We ensure that all data processing will be fair, lawful, and transparent.
2. Data be collected for specific, explicit, and legitimate purposes.
    2.1. Data collected will be adequate, relevant, and limited to what is necessary for the purposes of processing.
    2.2. Data will be kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay.
    2.3. Data is not kept for longer than is necessary for its given purpose.
    2.4. Data will be processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction, or damage by using appropriate technical or organisation measures.

Persons responsible	**Records to be kept**
Data Protection Officer	GDPR Policy
Academic Committee	Signed Induction forms
Service manager	
Course Instructors	

8.4 Learner Information Systems

Name Moodle Induction Level 6 Life and Workplace Coaching QQI PG21153 and the Therapeutic coaching programme QQI PG15152 students.

Scope This procedure outlines how we communicate to Learners how to use Moodle for the first time

Procedures

1. A month prior to course commencement each student is given instructions via email re: how to login to Festina Lente 'Moodle cloud learning Management System (L.M.S.) they are provided with a login name and encrypted password via Moodle to their email address. Once logged in students can access the course induction topic which includes the student manual, assignment cover sheets and assignment submission schedule.
2. 1 week prior to Module commencement students are allowed access to the relevant module topic where they can view the module Timetable, Handouts and Assignments.
3. When the relevant module is complete students are given access to PDF versions of the Module Presentations.

Persons responsible

Course administrator

Records to be kept

Moodle cloud retains student login and progress information

8.5 Retention of Records Procedure

Name   Retention of Records

Scope   This procedure outlines how records are to be stored in line with current GDPR rules and regulations

Procedures

1. All records are stored using an encrypted system — a folder should be created to store the files that need extra protection, and all files created or moved to this folder should be automatically encrypted.
2. Data is not kept for longer than is necessary for its given purpose.
3. Relevant individuals have the following rights in relation to the personal data we hold:
   - the right to be informed about the personal data we hold and what we do with it.
   - The right of access to the data we hold. More information on this can be found in the section headed "Access to Data" below and in our separate policy on Subject Access Requests."
   - The right for any inaccuracies in the data we hold to light, to be corrected. This is also known as 'rectification.
   - The right to have data deleted in certain circumstances. This is also known as 'erasure.'
   - the right to restrict the processing of the data.
   - The right to transfer the personal data we hold to another party. This is also known as 'portability.'
   - the right to object to the inclusion of any information.
   - The right to regulate any automated decision-making and profiling of personal data.

Persons responsible

Data Processing Officer

Academic Committee

Course Instructors

Records to be kept

GDPR Policy

Signed Induction Forms

8.6 Data Access Request Procedure

Name: **Data Access request procedure**

Scope: **This procedure outlines how Individuals (Customer, Volunteers, or staff members) requests copies of their personal data.**

- Send an email to Festina Lente Enterprises CLGs data protection officer amandacoffey@festinalente.ie and request copy of the required information. Be clear about which details you are looking for - if you only want certain information. This will help Festina Lente Enterprises CLG respond more quickly and accurately to your request.

- In your request you should give any details that will help us to identify you and find your data promptly- for example an employee reference number, address and any previous address, your date of birth, and you should provide a copy of a valid form of Identification e.g., Passport/Drivers Licence (This is to make sure that your personal information is not given to the wrong person.)

- Please see a sample email wording below as a guide.
  Dear Festina Lente, CLG Data protection officer, "I wish to make an access request under Article 15 of the General Data Protection Regulation (GDPR) for a copy of any information you keep about me, on computer or in manual form in relation to: Include details of the information requested, listing the departments you believe may hold the data. [Name] [Address] [Any Previous Address] [My employee I.D number is ...] if applicable. [My date of birth is...] I have attached a copy of a valid form of id… "

- In the normal course of events, Festina Lente Enterprises CLG is obliged to respond to your access request within one month of receiving a valid request. In certain limited circumstances, the one-month period may be extended by two months (considering the complexity of the request and the number of requests). Where Festina Lente Enterprises CLG is extending the period for replying to your request, we will inform you of any extension, and the reason(s) for the delay in responding, within one month of receiving the request.

- There is no fee payable by you to make an access request. However, where Festina Lente Enterprises CLG believes a request is manifestly unfounded or excessive (for example where an individual makes repeated unnecessary access requests), we may either charge a fee considering its administrative costs in dealing with the request(s) or refuse to act on the request(s).

- Exceptions to the right of access - Please note that Article 15 of the General Data Protection Regulation provides that the right of access does not apply in a few cases, to strike a balance between the rights of the individual, on the one hand, and the operational requirements of the organisation on the other. For this reason, there are circumstances under which Festina Lente Enterprises CLG will withhold certain data from disclosure. These circumstances will be reviewed on a case-by-case basis and will be explained to the requestor as part of Festina Lentes response to them, where appropriate.

Persons responsible
Festina Lente Enterprises CLG Data Protection Officer

Records to be kept.
letter of formal response
Application Form

9. Public Information and Communication

9.1 Annual Report procedure

Name   Annual Reporting

Scope   This procedure refers to the process of publicising a yearly Annual Report on the Festina Lente website with reference to Level 3 Transition Training Programme QQI PG10127 and Level 6 Life and Workplace Coaching QQI PG21153 and the Therapeutic coaching programme QQI PG15152.

Procedures

1. The Assistant CE will collate and gather information from all departments of Festina Lente including completion rates and key performance indicators.
2. The Annual Report will be presented to the Senior Management team, Academic Committee and Board of Director's for sign off.
3. Once approved the Annual Report will be published on the Festina Lente website.

Persons Responsible

Assistant CE

Records to be kept.

Annual Report

Learner Completion Rates

9.2 Publication of External Authentication Reports

Name   Public Information & Communication

Scope   This procedure refers to the process of publicising External Authentication Reports on the Festina Lente website

Procedures

1. External Authentication reports will be published on the Festina Lente website.
2. Reports will ensure student anonymity.

Persons Responsible

Academic Committee

Training Manager

Records to be kept.

External Authenticator report

10. Other parties involved in Education and Training

10.1 External Authentication List

Name   Collation of list of authenticators

Scope   This procedure refers to the process of ensuring that Festina Lente has access to a bank of External Authenticator's that can be alternated in line with Best Practice

Procedures

1. A document outlining approved certified external authenticators is kept on file by the Academic Committee.
2. This document is updated annually to record the authenticator assigned for each year
3. External authenticators are assigned in line with best practice and are alternated every two years in line with best practice where possible
4. The academic committee reviews the external authenticator reports annually

Persons Responsible

Academic Committee

Records to be kept.

Academic Committee Minutes

Document outlining list of External Authenticators

External Authenticator Reports

10.2 External Authentication appointments

Name   Appointment of External Authenticators

Scope   This procedure refers to the process of the recruitment of External Authenticators in line with best practice

Procedures

1. Authenticators are recruited based on professional qualification and experience.
2. Authenticators are reviewed annually by the academic committee and alternated every two years in line with best practice.

Persons Responsible

Academic Committee

Training Manager

Records to be kept.

Academic Committee Minutes

External Authenticator Reports

11. Self-Evaluation, Monitoring & Review

11.1 Evaluation & Review procedure

Name   Annual Surveys & Evaluation of Modules

Scope   This procedure refers to the process of ensuring that Festina Lente actively seeks feedback from its learners on an annual basis.

Procedures

1. A group evaluation meeting is scheduled annually at the end of the academic year by the Programme Facilitator's
2. Learners give feedback on service supports, QQI modules, educational environment, educational resources information & communication, programme facilitators and educational activities.
3. Feedback is collated into an Annual Evaluation with action points
4. The Annual Evaluation is sent to the Training & Day Service Manager for review
5. The Training Manager is responsible for ensuring the action points identified are implemented into the programme
6. The academic committee annually reviews evaluations

Persons Responsible

Training & Day Service Manager

Programme Facilitators

Academic Committee

Records to be kept.

Evaluation Reports

Name   Annual Survey

Scope   This procedure refers to the annual survey of programme of learners from the Level 6 Life and Workplace Coaching QQI PG21153 and Therapeutic coaching programme QQI PG15152 programmes.

Procedures

1.3   An online annual survey is conducted 3 months after the completion of all three Level 6 Life and Workplace Coaching QQI PG21153 and Therapeutic coaching programme QQI PG15152 courses.

1.4   The survey explores graduate views on the following:

        a.   Application of newly acquired skills

        b.   The degree to which the course has helped in career development

        c.   The degree to which the course could have been more effective in career development

        d.   Recommendations for future courses

    3. The on-line survey results are reviewed by the Academic Committee.

    4. Where appropriate, corrective action is taken to address areas for improvement.

Persons responsible

Training coordinator

Programme Instructor

Academic Committee

Records to be kept

Copy of Annual Survey & Actions arising

Minutes of Academic Committee Meeting

11.3 Delivering QQI Programmes as a Second Provider

Name   Delivering the Equestrian Training Programme as a Second Provider

Scope   This procedure refers to the management of quality assurance in collaboration with the Kildare, Wicklow Education Training Board (KWETB) for the Level 4 K.W.E.T.B. Horsemanship programme.

Procedures

1. Agreement to collaborate contract reviewed annually by both primary (KWTEB) and secondary provider (Festina Lente). Softcopy stored on our management drive.
2. Panel Approval Meeting held annually with Senior Development Officer (KWETB), Training Standards Officer (KWETB), Programme Manager and instructors (ETP Programme)
3. Annual audit completed by KWETB.
4. Annual Internal Peer Review completed to ensure best practice and reviewed by External Authenticator.
5. Code of Conduct completed annually by programme Manager and reviewed by External Authenticator.
6. Festina Lente have agreed to collaborate as a 2nd provider adhering to the Specialist Training Provision Operating Guidelines of the K.W.E.T.B.

Persons responsible

Programme Manager

Programme Instructors

KWETB Quality Assurance Team

Records to be kept

Code of Conduct

Peer Review

Audit Report

Agreement to Collaborate

Results Approval Panel Meeting Panel Approval Meeting Minutes

11.4 Use of New Instruments for Assessments

Name   Introducing Instruments for Assessments

Scope   This procedure refers to the introduction of new instruments for assessment purposes.

Procedures

1. Proposals of new instruments for assessments must be discussed and approved at the Academic Committee Meeting.
2. Proposals must include the rationale for requesting new instruments for assessment purposes.
3. Once agreed by the Academic Committee the students must be informed no later than one week before their assessment date either verbally or in writing.
4. Any changes to instruments used for assessment purposes will be reviewed by the Academic Committee which includes a learner representative.

Persons responsible

Programme Instructor

Academic Committee

Records to be kept

Proposal for new instruments

Academic Committee Meeting Minutes

Student Evaluations

Festina Lente Staff

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                              ┌──────────────────┐
                              │ Board of Directors│
                              └──────────────────┘
                              ┌──────────────────┐
                              │  Chief Executive  │
                              │     Officer       │
                              └──────────────────┘
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Board of Directors

Chief Executive Officer

Equestrian Learning Centre Manager

Financial Controller

Horticultural &Garden retail Manager

Assitant CE / HR Manager

Day Services Manager

Executive Assistant Training co-ordinator

Yard Manager

Head of Coaching

Accounts Assistants

Head Gardener

Social Media / HR Admin

Saol Anois Team Leader

Training Administrator

ETP/ SHP EFEP Outreach

Coaches & Yard Staff

Garden Maintenance Garden Shop STH Teams

Transition Training Programme

Saol Anois Day Programme

Behaviour Specialist *Supported Employment*

5. Organisational Chart

Festina Lente Enterprises CLG Risk Register/s

Festina Lente Academic Risk Register					
Risk	**Source** **(How can the risk occur)**	**Level of Risk:** **Low 1-3** **Medium 4-6** **High 7-10**	**Likelihood of Risk:** **Low 1-3** **Medium 4-6** **High 7-10**	**Mitigating Strategy**	**Likelihood of risk once mitigating strategy has been implemented.** **Low (1-3)** **Medium (4-6)** **High (7-10)**
Organisation fails to meticulously plan for and manage growth and change Organisation is unsuccessful in achieving its strategic objectives	Lack of Strategic Planning at Senior Level	(4-6) (4-6)	(4-6) (4-6)	Strategic Planning is a key responsibility outlined in the Board of Governance Terms of Reference which is agreed and adhered to by all Board Members. To ensure that a medium to long-term Strategic Plan (3-5 years) is developed in conjunction with the Board, staff, service-users, and other key stakeholders. This plan will be reviewed and amended as appropriate on an on-going basis.	(1-3) (1-3)
Risk that organisational structure fails to support effective and efficient implementation	Lack of policy and guiding principles	(4-6)	(4-6)	The Organisation adopts the 6 principles of the Code of Practice for Good Governance 1. Advancing Charitable Purpose 2. Behaving with Integrity 3. Leading People 4. Exercising Control 5. Working Effectively	(1-3)

of decisions and/or policies				6. Being Accountable and Transparent Decision making policy in place to ensure academic and financial decisions are made separately CEO does not have a vote as per Terms of Reference of the Academic Committee.	
A lack of compliance and oversight from the Board of Directors and Senior Management	Lack of transparent reporting to Board of Governance and review of information at Board Meetings.	(7-10)	(4-6)	Monthly report prepared by the CEO outlining QQI related matters is presented to the board and forms part of the agenda for the monthly Board Meeting. Complete the compliance checklist process as determined by the Charities Regulator in line with the Governance code for community, voluntary & charity Organisations Subscribed to the Triple Lock Standards as set out by the Charities Institute of Ireland based on good corporate governance, excellence in fundraising standards and transparent reporting. The Board of Directors is responsible for the governance of Festina Lente Enterprises CLG and has appointed the Chief Executive Officer to take responsibility for ensuring that each Programme is planned, delivered, and evaluated in a professional, transparent, and organised manner in line with all stakeholders' needs and expectations and relevant legislative requirements	(1-3)

Reduction in funding from HSE/KWETB	Organisation fails to meet Service Level Agreements and reporting procedures.	(7-10)	(1-3)	Festina Lente CLG complies with all reporting procedures requested by the HSE and KWETB. Festina Lente CLG has an agreed Service Level Agreement with the HSE and an Agreement to Collaborate contract with the KWETB.	(1-3)
A lack of financial controls leading to a withdrawal of funding	Lack of oversight from Financial Controller, Senior Management and Board of Governance	(7-10)	(1-3)	Festina Lente Enterprises CLG prepares financial statements in full compliance with Charity SORP (Standard of Reporting Practice under FRS102 Accounting regulation) and publishes them on our website. We have formally adopted the Statement of Guiding Principles for Fundraising. See www.charitiesinstituteireland.ie	(1-3)
The cost of insurance rising to an amount that the programmes are no longer financially viable	Inflation, rise in accidents in the Organisation increasing the price of Insurance	(4-6)	(4-6)	Festina Lente Enterprises CLG complies with all reporting procedures to its Insurance Company. Risk Assessments are implemented for all existing and new activities. The Organisation also has relevant PEL Agreements in place should the risk occur.	(1-3)

		(4-6)	(7-10)	Festina Lente Enterprises CLG is committed to the on-going learning, training, education, and personal development of all staff. The Organisation has robust procedures in place outlining the screening, recruitment, and selection of staff. Staff contracts outline a notice period to ensure a grace period for active recruitment. Succession & strategic planning to take this into consideration.	(4-6)
Loss of teaching staff – unique skill set required for STH and EAL modules	Staff retirement, illness, or resignation				
Accident or injury to students or staff members	Lack of implementation and review of safety procedures	(4-6)	(4-6)	Festina Lente CLG is committed to providing a safe learning environment to all students and staff members. The Health & Safety Committee is responsible for highlighting and mitigating any potential risks and meets monthly. Risk assessments are conducted as appropriate. The Child and Vulnerable Adult Protection Policy is outlined on the Festina Lente CLGs website. There are three certified Safeguarding Officers onsite. Staff and students are informed of who these are at induction and pictures are also displayed at information points around the campus. Teaching staff are Garda Vetted and have completed Introductory Safeguarding Training	(1-3)
Reputational Risk	If the Organisatio	(4-6)	(1-3)	Robust policies and procedures in place to ensure safe services	(1-3)

	n's reputation falls below expectations of students and staff			for staff and students outlined in Quality Assurance Manual Health & Safety Statement and Committee in place Student council forum for students to raise any issues or concerns Annual evaluation of programmes	
Academic Quality	Lack of controls to ensure Quality Assurance	(4-6)	(1-3)	A full review of all policies and procedures has taken place to ensure Quality Assurance across all teaching and learning programmes in line with QQI standards. The terms of reference for the Academic Committee have been reviewed to ensure best practice and meets on a quarterly basis. See terms of reference for more information. Staff are recruited in line with current recruitment procedures with academic qualifications, work experience and expertise informing the recruitment and appointment of new staff.	(1-3)
Assessment	Lack of controls to ensure fair assessment of students	(4-6)	(1-3)	The Academic Committee is responsible for overseeing the assessment and examination procedures and ratifying the appointment of external examiners. Internal and External Verification procedures are in place. Peer Reviews and Code of Conduct Observations are completed with instructors on an annual basis. Appeals procedure in place which is outlined at learner induction.	(1-3)

Festina Lente C.L.G. Limited All Company Risk Register

Risk No	Description of Potential Risk	Description of Potential Impact	Risk Owner	Steps to Mitigate	Monitoring Frequency	Probability 1-5	Impact 1-5	Controls 1-3	Risk Rating
Risk Category: Governance									

Risk No	Description of Potential Risk	Description of Potential Impact	Risk Owner	Steps to Mitigate	Monitoring Frequency	Probability 1-5	Impact 1-5	Controls 1-3	Risk Rating
1	Board of Directors skills set does not reflect the skills set required for the Organisation in context of the need to relocate by 2024	Could compromise the Organisations ability to relocate fundraiser	Board of Directors and Chairperson	Identify the skill set and experiences required from Board of Directors Recruitment campaign to recruit additional Board Members	Every Board of Directors meeting	2	3	3	18 Medium
2	That the Board of Directors does not give consideration to FL's legal form and constitution and decide whether they are fit for purpose	Potentially could lose registration with the CRA Core services develop that are outside of the constitution.	Board of Directors	Board of Directors to review the constitution	Board of Directors Meetings	3	2	2	12 Medium
				Risk Category: Strategic					
1	That the organisation does not have an up-to-date Strategic Plan (Note: the identification of lands is the natural and logical starting point of the start of this process)	That resources may not be supporting the Organisations core aims and goals and priorities. Elements of confusion may arise due to the absence of priorities	Board of Directors	That there is a current Strategic Plan in place	Once confirmation is known about the potential site If this does not materialise a SP for an alternative will need to be developed 2020 September	2	4	1	9 Low
2	That all stakeholders cannot contribute to the development of a SP	That the SP does not reflect stakeholders' views/needs etc., resulting in compromising the use of resources	Board of Directors and CEO	That a full representative list of stakeholders is identified and invited to input to the ST development	By end of 2020: like previous engagement November 2018	1	4	1	5 low
				Risk Category: Compliance (Legal or Regulatory)					
1	Non-compliance with HR legislation,	e.g., unfair dismissal, employment,	HR Manager	HR staff member recruited with proved experience	Dependent upon HR action being addressed	2	5	1	11 low

Risk No	Description of Potential Risk	Description of Potential Impact	Risk Owner	Steps to Mitigate	Monitoring Frequency	Probability 1-5	Impact 1-5	Controls 1-3	Risk Rating
	equality claims, etc.	equality claims, etc.,		of human resources. Comprehensive human resources manual developed and updated in line with current HR legislation. External Human Resources Consultants are used in all situations outside the normal day to day matters					
	Accidents, poor health, and safety practices Noncompliance with Health and Safety Policy Document, Absence of manual handling training Absence of risk assessments being conducted.	Injury, fatality, financial claims, increased insurance premium	HR Managers and all managers	Regular updating of the Health and Safety Policy Full compliance with Health and Safety requirements Monthly Safety Committee Meetings including monthly risk assessments. Regular manual handling workshops Recording of all accidents and incidences and reviewed at H &S Meetings Updated accident and incident forms to include corrective action taken as appropriate	Annually Monthly That all staff receive manual handling Ongoing	3	5	1	16 medium
2	Festina Lente Enterprises CLG does not comply with the requirements as set out in the Service Level	Loss of funding Loss of ability to continue to provide services.	CEO and Managers	**Pobal:** Six monthly returns Recruitment: Pobal guidelines Finances: Pobal		2	4	1	9 low
	KWTB: low numbers	Programme is not financially sustainable	Manager: Training and Day Services: CEO	Finances: in line with HSE guidelines Service Delivery: Quarterly audits Regular and ongoing PR of the programme	Six monthly As required. On-going Quarterly	3	4	2	25 High

Risk No	Description of Potential Risk	Description of Potential Impact	Risk Owner	Steps to Mitigate	Monitoring Frequency	Probability 1-5	Impact 1-5	Controls 1-3	Risk Rating
					Ongoing				
2	Loss of registration with AIRE	Loss of reputation	Equestrian Center Manager / CEO	Ensure on-gong compliance with standards	Ongoing	1	2	1	2 low
	Loss of registration with the HETI Pilot Project for Equine Assisted Activities	At a time when there is no registration for EAA's could result in both reputational damage and drop in number of people attending	Equestrian Center Manager / CEO	Incorporate standard compliance into Equestrian Meetings Discuss with all Equestrian Staff	Monthly	2	3	1	6 Low
Risk Category: Operational									
1	Prolonged and /or unexpected absence of CEO and /or Managers	Compromised organisational and/or departmental performance.	CEO	Assistant CE appointed with dual role of deputising in the CEO's absence	Board of Directors Meeting	2	3	1	6 low
	Financial Controller	Management accounts Pobal returns. Wages Auditing of accounts (time related)	Financial Controller CEO	The management of the staff will fall to CEO Jill Carey. Auditors will be asked to provide all other support. Key processes to be written up for all accounts support staff.	As it occurs	2	3	1	6 Low
	Accounts Payable	Payments will be delayed to students. Suppliers will be delayed. Purchase order system will delay payments to dealers		Entering of receipts and payment from the bank will fall to the Riding School Accounts Assistants. Introduction of auto entry Entering supplier invoices and queries will be split up between all other staff members and supervised by the Financial Controller for consistency and accuracy. Purchase orders to	As it occurs	2	3	1	6 low

Risk No	Description of Potential Risk	Description of Potential Impact	Risk Owner	Steps to Mitigate	Monitoring Frequency	Probability 1-5	Impact 1-5	Controls 1-3	Risk Rating
				be made using SAGE. All other areas including bank recs, supplier payments and service user payments will be covered by the Financial Controller.					
	Accounts Receivable One of job-sharing staff are absent	Invoicing clients will be delayed resulting in		Second job-share staff would be asked to work extra hours. Additional staff to be recruited on a temporary basis. Financial Controller to support on a temporary basis	As it occurs	2	3	1	6
	Absence of Equestrian Manager	Timetabling: term and non-term times	EC Manager /CEO	Yard Manager / Bookings Admin. to manage staff.	As it occurs	2	3	3	18 Medium
	Absence of Head of Coaching	Drop off in clients	EC Manager /CEO	To develop a Learning Plan for identified coaches. Additional time for EC Manager through recruitment of Admin Assistant will support coaching improvement plan	September 2022	2	4	3	24 Medium to high
Risk Category: Financial									
2	Loss of data due to IT Difficulties	Spam or other IT corruption – spam risk of identity theft and viral theft of passwords/ loss of confidence from our customers/online payments	HR Manager	All data is backed up onto the server and copied weekly. All PC operators conduct regular Microsoft updates Antivirus is installed on all computers. Internal guidelines on IT Security circulated to all staff. All data to be backed to the cloud	Monthly Management Team Meetings	2	4	2	16 Medium

135

Risk No	Description of Potential Risk	Description of Potential Impact	Risk Owner	Steps to Mitigate	Monitoring Frequency	Probability 1-5	Impact 1-5	Controls 1-3	Risk Rating
1	Financial procedures are not maintained	Potential loss of funding from funders Auditor would not sign off on accounts	Financial Controller	Financial procedures to be updated for Quarterly Management Accounts are conducted internally and verified by the accountant. Quarterly accounts have moved to monthly management accounts Finance Sub-committee to be set up	Monthly management team meetings Board of Director meetings	2	4	1	8 low
2	Loss of funding Non-compliance with funders requirements	Loss of jobs Reduction of services to people Loss of reputation	CEO	That each area reviews its compliance with funders requirements That an initiative-taking approach is taken in relation to this That non compliances are identified and form part of the Board of Directors monthly reports	As it arises e.g., recruitment, compliance with financial procedures, etc.,	2	3	2	12 medium
	Fraud Weak internal financial controls Poor management of controls / inventory	Loss of revenue	Financial Controller	All financial staff read and adhere to our Internal Financial Controls. Authorisation checks in place to identify any transactions that could potentially be fraudulent. All accounts staff to sign off on the Financial Procedures	Quarterly accounts Weekly meetings CEO and Financial Controller Accounts meetings	2	3	1	6 low
Risk Category: Environmental or External									
1	Resurgence of Covid-19 Pandemic	Lock down	CEO and Managers	This will depend on the degree of lock down. Repeat of responses to	As it occurs	4	4	1	17 medium

Risk No	Description of Potential Risk	Description of Potential Impact	Risk Owner	Steps to Mitigate	Monitoring Frequency	Probability 1-5	Impact 1-5	Controls 1-3	Risk Rating
				March 13th, 2020, lockdown Review cash reserve policy to reflect potential financial losses					
	Complacency / non-compliance with protocols to prevent Covid 19 spread	Lock down	CEO – Managers	Appointment of Covid officer Training for covid officers Weekly meeting to review compliance and matters arising.	Weekly	3	5	1	15 Low
	Local spread of Covid within Festina Lente Enterprises CLG	Closure of Festina Lente Enterprises CLG	CEO / Managers/ Health and Safety Officer	Weekly meeting to review compliance and matters arising.	Weekly	2	4	3	15
2	Significant downturn in the economy	Loss of income to maintain employment and continue with service provision	CEO and Managers	Depending on degree Job contracts reflect temporary layoffs due to external circumstances. Review cash reserve policy to reflect potential financial losses	As it occurs	2	4	3	24 medium
	No alternative premises are sourced in advance of vacating current facilities	Loss of employment for up to sixty-three people Reduction / cessation or transfer of services for all current clients Rehoming of thirty-four horses	Board of Directors and CEO	Planner appointed for sourcing alternative facilities.	Every Board of Directors Meeting	2	5	2	20 Medium
Risk Category: Reputational									
1	Non accidental injury and abuse (high number of children, young people, and vulnerable adults)	Injury to a child / vulnerable person Investigation Reputation Loss of confidence in the organisation	CEO- HR Manager	Policy on Child Protection and Vulnerable Adults developed. Designated Person for Child Protection and Vulnerable Adults developed communicated to staff and visitors. All staff receive Child Protection Training	That all checks are carried out Form part of Staff and HR meetings	2	5	1	10 medium

Risk No	Description of Potential Risk	Description of Potential Impact	Risk Owner	Steps to Mitigate	Monitoring Frequency	Probability 1-5	Impact 1-5	Controls 1-3	Risk Rating
				All new staff have two reference checks and Garda Clearance All volunteers have two reference checks and Garda Clearance All areas where coaches are alone with young people and /or vulnerable adults have security cameras (exception is sensory trail) Review Lone Working Policy to be developed					

The Matrix for assessing impact, likelihood, and effectiveness of existing controls

Each risk is scored in terms of:
* Probability i.e., the probability of future occurrence, how likely the risk it is that the risk will occur and how frequently it has occurred in the past.
* **Impact** i.e., the impact on the organisation and external stakeholders if the risk occurs.
* **Effectiveness of existing controls** i.e., given the controls which are currently in place, how effective are they at mitigating the risk.

A scale of **1** to **5** is used for **Likelihood** and **Impact**, and **1** to **3** is used for the effectiveness of existing **Controls**, according to the following matrix:

Likelihood Scale of 1 - 5	Impact Scale of 1 - 5	Controls Scale of 1 - 3
1 = Rarely, if ever	1 = No significant impact	1 = Controls highly effective
2 = Possible	2 = Minor impact	2 = Controls effective, but could be improved
3 = Likely	3 = Significant but containable impact	3 = No controls / controls are ineffective
4 = Very Likely	4 = High impact	
5 = Unavoidable / already occurring	5 = Extremely detrimental impact	

The risk score is determined **by multiplying the risk impact by the risk likelihood by the effectiveness of the controls**.

The following traffic light system can be used on a risk register to highlight / prioritise risk:

Risk Level	Risk Score	Action / Response
High	25+	[Insert text here regarding the action your charity will take for risks rated High]
Medium	13 – 24	[Insert text here regarding the action your charity will take for risks rated Medium]
Low	0 – 12	[Insert text here regarding the action your charity will take for risks rated Low]

Festina Lente C.L.G. Data Retention Schedule			
Record Type	**Default Retention Period**	**Final Disposition**	**Basis for Retention or Destruction**
Board Membership			
Membership Records	Permanent Retention	Retain	Companies Act 2014
Human Resources			
Employee HR File (Hard and Soft Copy) Exception: • Parental Leave Records • Force Majeure Leave Records • maternity Leave	Termination of employment plus 7 years Minimum retention period: • 12 Years • 8 Years • 8 Years	Delete	Variety of legislative requirements to keep certain parts of an employee's records for certain lengths of time such as: • Terms of Employment (Information) Act 1994 • Industrial Relations (Amendment) Act 2015 • Employment Permits Act 2006 • Employment Equality Act 1998 • Protection of Employees (Fixed Term Work) Act 2003 • Unfair Dismissals Act 1977 • Various Leave and Benefit Acts • Safety, Health, and Welfare at Work Act 2005 Termination of employment plus 7 years satisfies our legal requirements and operational needs while not being excessive. Any exceptions are noted and will be kept for the minimum period required if this period has not yet expired upon 7 years postemployment. Added factors include funders requirements.
HR Masterfile (Annual Spreadsheet)	• 7 Years	Retain each year's document for 7 years After 7 years review document and reduce data (Data Reduction) (Retain employee	• Corporate knowledge • Legitimate interest of former employee queries or Permanent maintenance and added data required for current employees
Record Type	**Default Retention Period**	**Final Disposition**	**Basis for Retention or Destruction**

Record Type	Default Retention Period	Final Disposition	Basis for Retention or Destruction
Training and Development Register	• 7 Years	Delete	Safety, Health, and Welfare at Work Act 2005 Employment Equality Act 1998 Unfair Dismissals Act 1977 Employment Equality Act 1998 Workplace Relations Act 2015
Garda Vetting Records • Forms and Supporting documentation • Disclosure • Vetting Register	• Retain until disclosure is received • Retain until assessed • 7 Years	Data Reduction /Delete (Delete individual employees vetting history over 7 years old if they have left Festina Lente's employment	National Vetting Bureau (Children and Vulnerable Persons) Acts 2001 to 2016
Job Descriptions	• 10 Years	Archive	Historic Value
Industrial Relations – Negotiations and Agreements	Permanent Retention	Retain	The Industrial Relations Acts 1946 to 2015 Corporate Value
Unsolicited Job Applications	No Retention	Delete	None
Recruitment Records – solicited – not shortlisted	• 1 Year	Delete	Employment Equality Act 1998
Recruitment Records – solicited – shortlisted - unsuccessful	• 7 Years	Delete	Employment Equality Act 1998
Recruitment Records – solicited – shortlisted - successful	Termination of employment plus 7 years (In HR File)	Delete	Employment Equality Act 1998 Align with Employee HR file

Record Type	**Default Retention Period**	**Final Disposition**	**Basis for Retention or Destruction**	

Events

Event Registration/Attendance Details	• 1 Year	Delete	GDPR – Retain no longer than is necessary.
Event Evaluation Details	• 1 Year	Delete	GDPR – Retain no longer than is necessary
Student Records - HSE/POBAL services			
Active Users	• Retain while Active • 5 Years after Inactivity	Delete/Anonymise	• In Use • Necessary for QQI
Moodle student Records – Active Users	• Retain while Active • 5 Years after inactivity	Delete/Anonymise	• In Use • Necessary for QQI
Student contact details	• Retain while Active	Permanent Retention (Unless consent in withdrawn)	• GDPR
QQI/QBS Reports	• 5 years	Delete	• Qualifications and Quality Assurance (Education and Training) Act 2012
Tutoring Service Hours Reports	• 7 Years	Delete	Align with employee records
Student Academic Records	• 5 Years	Delete	Results can be accessed on QQI portal
Assessment data	• 5 Years	Delete	Results can be accessed on QQI Portal
Record Type	**Default Retention Period**	**Final Disposition**	**Basis for Retention or Destruction**
Communications			
Personal Public Relations Material	Permanent Retention (Unless consent in withdrawn)	Retain/Archive	Consent given Historical Value

Website Form Records:	• 1 Year	Delete	GDPR – Retain for no longer than is necessary
Social Media Communications with Individuals	• 1 Year	Delete	GDPR – Retain for no longer than is necessary
Member Communications, Newsletters, Government Submissions, Media Releases	Permanent Retention	Retain/Archive	No personal data, historic value.
Client Records	• 10 Years	Delete	Contractual Obligation Statute of Limitations Act 1957 Historic/Educational Value
Governance and Compliance			
Data Protection Registers: • Subject Access Requests • Information Requests • Data Security Breaches	• 5 Years	Anonymise	Data Protection Act 2018
Legal Advice	Permanent Retention	Anonymise (if necessary)	Historic Value
Board: • Agenda • Official Papers • Minutes	Permanent Retention	Archive	• Companies Act 2014 • CRA Guidance • Retain for 7 years
Record Type	**Default Retention Period**	**Final Disposition**	**Basis for Retention or Destruction**
Board Member Statutory Filings (CRO/CRA)	Permanent Retention	Retain	• Companies Act 2014 • Charities Act 2009
Company Statutory Filings (CRO/CRA)	Permanent Retention	Retain	• Companies Act 2014 • Charities Act 2009

Administration			
Client Complaints	Closure of Complaint plus 6 Years	Delete	• Statute of Limitations Act 1957 • Corporate Value
Email Queries	Closure of Query plus 6 Years	Delete	• Corporate Value • Consistency with complaints
Staff Contact Details	Keep up to date Previous Lists: 1 Yr.	Delete	GDPR Article 5.1 - keep data up to date

Health and Safety			
Safety Statement	Until policy is replaced plus 7 Years	Delete	Good Practice Consistency with Strategy and Policy Key documents will be held as part of Board Records
Safety Inspections/ Audits/ Consultations/ Risk Assessments	7 Years	Delete	Safety, Health, and Welfare at Work (General Application) Regulations 2007 – S30 Consistency

Record Type	Default Retention Period	Final Disposition	Basis for Retention or Destruction

Risk Management			
Risk Identification, Assessment and Management Records	Until replaced plus 7 years	Delete	Good Practice Consistency with Strategy and Policy Key documents will be held as part of Board Records

Business Continuity Management Records	Until Plan/policy replaced plus 7 years	Delete	Good Practice Consistency with Strategy and Policy Key documents will be held as part of Board Records
Quality Management Scheme accreditation	Termination of Accreditation plus 1 year	Delete	Good practice
Quality Audits	7 Years	Delete	• Good Practice • Consistency with safety audits • Key documents will be held as part of Board Records
Finance			
Various Financial Data Records: • Accounts payable/receivable • Payroll records • Travel/expenses/invoice claims • Cheques • Income control accounts • Debtors Ledgers • Account reconciliations • Reports and Statistics	Current Year plus seven Years	• Delete • Permanently Retain 1 copy of all reports and statistics	• Various • Finance Acts 1963,1968,1992 • Taxes Consolidation Act 1997 • Statute of Limitations 1957 • Companies Act 2014 • Corporate Value
Various Financial Documents: • Bank Statements • Tax Clearance certificates • Financial Statement • Audit Reports • Annual Reports	Current Year plus 7 Years	Delete	• Various • Finance Acts 1963,1968,1992 • Taxes Consolidation Act 1997 • Statute of Limitations 1957 • Companies Act 2014
• Fixed Asset Register • Insurance Policies • Budgets	Permanent Retention	Retain	• Finance Acts 1963,1968,1992 • Good practice

Procurement Records/ tenders and quotations	Current Year plus 7 Years	Delete	• Various • Finance Acts 1963,1968,1992 • Statute of Limitations 1957 • Companies Act 2014
Contracts/Agreements	Termination of Contract plus 7 years	Delete	Statute of Limitations Act 1957
Contracts/Agreements under seal	Termination of Contract plus 12 years	Delete	Statute of Limitations Act 1957
Property Title	Retain during ownership	Transfer to owner	Required
Research			
Research Data	Completion of research plus 6 months	Anonymise	GDPR – Retain for no longer than is necessary
Research Data (Anonymised)	Permanent Retention	Retain/Archive	No personal data, historic and educational value.
Research Project Administration Records	Duration specified in a contract or 10 years from submission of Research	Delete	Contractual Obligation

Table of Figures: