

Compliance Training Policy

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This policy will be reviewed periodically to ensure Compliance with changes in employment law, equality and diversity legislation and to meet Brunel University London training needs as necessary. If this policy or procedure is not compliant, the relevant legislation shall prevail.

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1. POLICY STATEMENT

Brunel University London (Brunel) is committed to creating and maintaining a safe working environment, minimizing risk and protecting as far as reasonably possible all colleagues, students and visitors. To meet its obligations, it will ensure that relevant statutory and mandatory knowledge, skills and training needs are identified for colleagues, that appropriate training with protected learning time is provided and robust Compliance records are kept.

Compliance training is specific training that is:

- **Statutory/Legal** - relates to relevant knowledge, skills and training needs as detailed in statute or legal requirements.
- **Risk management training** - relates to any training that supports the management of and alleviates risk and any subsequent incident, claim or complaint, and is a mandatory requirement.
- **Mandatory** - relates to relevant knowledge, skills and training needs that are detailed in local policy and will include knowledge, skills and training needs for specific colleague groups and individuals.

2. SCOPE

This Policy relates to all existing and newly appointed colleagues at Brunel with the intention that irrespective of grade or term of employment or contract colleagues' complete Compliance training specific to their professional and individual needs. This includes those on part-time and fixed term contracts, hourly paid colleagues and agency workers (see section 9).

It is an expectation that **all colleagues** will be fully compliant (within the timescales set out in section 6).

All colleagues are expected to be proactive and take responsibility to ensure they complete their Compliance training and any additional role dependant training. Senior Leaders and line managers are responsible for ensuring that colleagues undertake compliance training as applicable to their role.

3. PURPOSE

The aim of this Policy is to ensure colleagues understand their obligation to complete Compliance training. It also sets out the responsibilities of line managers in supporting Compliance training as well as the responsibilities of Subject Matter Experts (SMEs), other committees and key post holders at the University.

The Policy sets out minimum organisational wide training subjects and to whom these apply. In addition, the Policy sets out processes for identifying and providing Compliance training, related responsibilities, monitoring and ensuring attendance.

Since local training requirements are diverse and in a constant state of flux, it is not possible within this Policy to define all specific training requirements given the complexity of the organisation. The Policy, however, sets out an agreed list of core Compliance training subjects which have been recognised by Brunel as requiring consideration in an organisational context.

3.1 Brunel Compliance training

For the purposes of this Policy, Compliance training is defined as:

- Minimum training critical to mitigating key organisation-wide risks based on interpretation of legislation, directives or other significant requirements.
- Training which is non-optional for all relevant or identified post holders based on role requirements and where protected learning time is provided to complete training.
- Where specific training requirements of all university posts are centrally identified, maintained and monitored.

3.2 Training needs analysis

The SME or designated lead is responsible for training and content analysis for Compliance subjects. The Compliance subjects are presented in the form of a training matrix, which describes the minimum training and content required for colleague groups and frequency of training to meet legislative and organisational requirements.

Training for Compliance may be offered at more than one level due to the variations in the knowledge/competences required for different colleague groups.

In general:

- Level 1 content: is awareness training and information required by **ALL** colleagues.
- Level 2 content: is intermediate training essential for specific groups of colleagues.
- Level 3 content: is advanced level training, highly specialised and applicable to certain colleagues and roles.

* Colleagues required to undertake Level 2 & 3 training will be identified through role type and risk assessment.

The approved list of Brunel Compliance training subjects together with guidance on which posts require training can be found in the **Compliance Training Matrix (Appendix 1)**. The target audience is indicative, will be reviewed, and updated annually.

Level 1 training requirements cannot be modified or exempted for permanent colleagues unless specifically agreed by the HR/EDI Committee.

4. POLICY IMPLEMENTATION AND REVIEW

Failure to implement or comply with this Policy and associated procedures may result in any of the following:

- Potential harm or risk to colleagues, students and visitors
- Brunel failing to comply with legal, contractual and professional requirements
- Loss of reputation for Brunel and financial penalty

The delivery of effective and efficient Compliance training is the responsibility of the HR/EDI Committee who will annually review Brunel's Compliance Training Matrix, training facilities and resources.

The Audit Committee will review Compliance completion data at least annually to ensure that agreed training is being undertaken and that they are satisfied that risk is being minimised as far as reasonably practicable.

5. KEY ROLES AND RESPONSIBILITIES

This section outlines the key policy stakeholders and their responsibilities.

5.1 Executive Board

The Executive Board have a duty to:

- Monitor the policy, ensuring that Compliance training is delivered to minimise risk to the University and people
- Ensure that provision is made to deliver the identified requirements and that resources (including suitable systems) required to deliver the Compliance training plan are available.
- Ensure that ALL colleagues receive protected time to complete Compliance training.
- Ensure that resources (including systems) are in place to effectively deliver the policy requirements and identified training. Any requests that need budget approval should be made to the Executive Board.

5.2 HR/EDI Committee

The HR/EDI Committee have a duty to:

- Under delegated responsibility from Executive Board, monitor the policy, ensuring that Compliance training is delivered to minimise risk to the University and people.
- Approve the Compliance training matrix and rationale for Compliance training subjects.
- Recommend and monitor plans for any additional Compliance training and developments.
- Monitor efficiency and effectiveness of Compliance training delivery.

Specific responsibilities apply to the following Committee / Board Members:

- **The University Secretary and General Counsel** has a duty to ensure that this policy meets the legislative requirements for risk management and to ensure the effective governance of this policy for Compliance training.
- **The Director of Human Resources** has overall responsibility for monitoring and reporting to the appropriate boards.

A detailed list of roles and responsibilities is listed in Appendix 2.

6. INDUCTION AND ONBOARDING

New starters will be required to complete ALL level 1 Compliance training within 3 months of joining Brunel. Line managers are responsible as part of the local induction process for allocating time for completion of training and informing the new starter which role specific training is to be completed.

Colleagues will not be able to complete probation unless all level 1 Compliance training is completed.

Level 2 & 3 training will be discussed and agreed with line managers based on the role and risk assessment and if identified should be completed within 1 year of commencement or sooner if agreed this is necessary to minimise risk.

7. SUBJECT MATTER EXPERTS (SMEs)

Subject matter experts (SMEs) are designated experts in particular subjects within Brunel who have responsibility to define Compliance training requirements (based on risk) and mode of delivery in their area of specialism.

If an SME or designated lead wishes to create additional Compliance subjects, or significantly change current requirements, they must seek approval from the HR/EDI Committee using the form in Appendix 3.

Once approved the subject will be added to the Compliance Training Matrix. The SME or lead and Organisational Development Team (OD) will create plans for the delivery of newly identified subject areas and/or where amendments to the target audience and/or mode of delivery is required.

8. TEMPORARY/SHORT TERM CONTRACTS

Student workers, hourly paid, invigilators, temporary consultants/contractors and those employed on short-term/temporary contracts for less than three months are deemed to be compliant once they have read and recorded with their line manager the completion of the **Mandatory Compliance Training Booklet**. This should be completed as soon as is practicable following commencement with Brunel but no later than one month after commencement. Colleagues on temporary contracts for more than three months will be expected to complete the full compliance training.

On occasions colleagues in temporary/short term roles may be required to undertake full compliance training modules if identified through risk assessments.

Colleagues working 0.2 FTE or less will complete the Mandatory Compliance Booklet however may be required to undertake full compliance training modules if identified through risk assessments.

9. ANNUAL PEOPLE DEVELOPMENT PLAN

All Compliance training activities, including online options will be planned and published in advance of delivery and accessible to all colleagues.

10. DELIVERY OF COMPLIANCE TRAINING

Compliance training will be delivered as agreed with the SME to ensure the effectiveness of learning transfer and outcomes, understanding of current knowledge and context as well as efficiency of delivery. Main delivery modes are outlined in Appendix 1 below however other delivery modes, including the use of assessments, may be used to update individual or groups of colleagues.

11. MANAGING ATTENDANCE AT IN-PERSON ACTIVITIES

Compliance training subjects are delivered through a blended approach including online self-directed learning modules as well as workshop-based activities, either in person or online. For workshops, whether face to face or online, the following will apply:

- Delegates are required to give adequate notice if they are unable to attend a booked training session (except in exceptional circumstances e.g., illness).
- Delegates must take responsibility to rebook for a new date at the time of withdrawal.
- If a delegate arrives more than 10 minutes after the start of a Compliance training session, they will not be permitted to join the workshop, this applies to both face to face and online and will be recorded as failure to attend. The same will apply to a delegate who returns late from breaks.

It is the SME/Lead Facilitators responsibility to ensure that attendance is recorded. Training records should be passed back to the Organisational Development team for central recording.

12. MONITORING COMPLIANCE AND NON-COMPLIANCE

The monitoring of compliance training uptake will take place at various levels across Brunel.

- Compliance monitoring reports will be produced at least termly by the Organisational Development Team. Data from these will be shared as appropriate to support individual

colleagues and line managers in their responsibility of ensuring that compliance training is up to date.

- Annual updates will be reviewed at the HR/EDI Committee, Audit Committee and Health and Safety Committee.
- Colleagues are expected to take responsibility for completing and monitoring their own Compliance training and ensure they are up to date at all times.
- Line managers have a responsibility to ensure that department/team members have completed relevant Compliance training and are up to date. They should support the completion of Compliance training by ensuring team members are scheduled and released for training as soon as practicable and where possible, prior to the expiry of their previous Compliance training.
- Line managers are responsible for ensuring that new starters or colleagues returning from long term absence (i.e., parental leave, long term sickness) attend training and be compliant as soon as possible.
- Senior Leaders and Heads of Departments should ensure that colleagues within their own teams have completed required compliance training in line with their role.
- Executive Board Members should ensure that colleagues within their own areas of responsibility have completed relevant compliance training and act as role models in ensuring that their training completion is always at 100%.

12.1 Managing Non-Compliance

Non-completion of any of the Compliance subjects by active Brunel colleagues may be considered a 'fitness to practice' issue. Line Managers are responsible for supporting team members to enable completion as quickly as possible where a subject has expired.

Refusal to complete may be considered a conduct issue and will be dealt with through appropriate University policies. HR Business Partners will support line managers with ongoing concerns regarding non-completion of training.

13. MONITORING INCIDENTS AND OUTCOMES

The main purpose of Compliance training is to minimise risk and create a safe working environment. SMEs/Designated Leads are therefore responsible for reviewing incidents and undertaking risk assessment in their specific subject areas and identifying the training related to this.

As a result of a risk assessment made by the SME, any proposed changes to the Compliance training course should be approved by the HR/EDI Committee.

14. MONITORING THE IMPACT OF THE COMPLIANCE TRAINING POLICY

The University will evaluate Compliance training using post workshop evaluations.

The SME has a responsibility to review the effectiveness of Compliance training against risk and amend and update as required. They may also recommend withdrawing a Compliance subject. The OD Team will support the SMEs in the review of Compliance training and will monitor the practical implementation of this Policy.

An annual summary review of Compliance training and recommendations for amendments will be submitted to the HR/EDI Committee.

APPENDICES:

Appendix 1

BRUNEL COMPLIANCE TRAINING MATRIX 2023					
Target Audience	SUBJECT	Refresher frequency	Main Delivery Mode	Approx. Duration	Comments / SME
Level 1 Training: Required for all colleagues and must be completed within 1 month of commencement; completion targets are set at university level.					
ALL STAFF	Anti- Bribery	3 years	Online	1 hour	The Bribery Act 2010 University Secretary and General Counsel
All STAFF	Data Protection	Annual	Webinar/Face to Face /Online	1.5 hours	Records Management Included Head of Privacy
ALL STAFF	UKVI (UK Visa and Immigration) - Student Visa Compliance	2 years	Online / Workshop	1.5 hours	Workshop for new staff who have interaction with international students. Online for staff who do not interact with international students. Compliance and Sponsorship Manager
ALL STAFF	Health and Safety Module	3 years	Online	1.5 hours	Currently two modules - work being undertaken to combine to one module. Head of Health and Safety
ALL STAFF	Fire Safety	3 years	Online	1.5 hours	Currently included in above. Separate module will be available.

					Head of Health and Safety
ALL STAFF	Equally Different Diversity in the workplace	3 years	Online	1 hour	EDI (Equality, Diversity, and Inclusion) Partner
ALL STAFF	PREVENT	3 years	Workshop/Online	1 hour	Head of Student Affairs and Case Work
ALL STAFF	Environmental Sustainability	3 years	Online	1 hour	Director of Sustainability
ALL STAFF	Information Security	Annual	Online	1 hour	Head of Cyber Security
ALL STAFF	Risk Assessment	3 years	Workshop / Online	1.5 hours	Head of Health and Safety
Level 2 & 3 training: Required for identified colleagues and roles through risk assessment. Completion targets are not set centrally but managers are responsible for ensuring enough appropriately trained staff are able to work safely at a local level.					
Health and Safety Training	<ul style="list-style-type: none"> • Manual Handling • Work Equipment • PPE • COSHH (Control of Substances Hazardous to Health) • Radiation • Biological Safety 	Variable	Workshop/Online	Variable	Head of Health and Safety Health and Safety training will be carried out based on role risk assessment. This list is not exhaustive and may be subject to additional training based on risk assessment.

People Management: Managers who undertake recruitment and selection	Recruitment and Selection	One off session	Workshop	Half day	Associate Director HR – Employment Services
Safeguarding Training					
Target - Apprenticeship Teaching Delivery University Safeguarding Lead Level 2	Safeguarding and Support Adults	3 years	Webinar	1.5 hours	Brunel Safeguarding Lead
*Any role with responsibility for working with under 18s Target - Outreach work delivery, Student Living staff University Safeguarding Lead Level 2	Safeguarding and Support Children	3 years	Webinar	1.5 hours	Brunel Safeguarding Lead
Designated Safeguarding Officers, Student Support Team Level 3	Safeguarding and Support Adults	3 years	Webinar	2 hours	Brunel Safeguarding Lead

*Any role with responsibility for working with under 18s Target - Designated Safeguarding Officers, STEM schoolchildren Level 3	Safeguarding and Support Children	3 years	Webinar	2 hours	Brunel Safeguarding Lead
Freedom of Information	Freedom of Information	One off session	Workshop	1 hour	Head of Data Protection
Research	Research Ethics Research Integrity	One off session	Workshops / Online	Varies	Graduate School

Appendix 2 - Detailed Roles and Responsibilities

Role(s)	Responsibilities and related tasks
Executive Board	<ul style="list-style-type: none"> • Monitor the policy, ensuring that Compliance training is delivered to minimise risk to the University and people. • Ensure that provision is made to deliver the identified requirements and that resources (including suitable systems) required to deliver the Compliance training plan are available. • Ensure that ALL colleagues receive protected time to complete Compliance training. • Ensure that resources (including systems) are in place to effectively deliver the policy requirements and identified training. • Monitor completion of training within their own teams • Lead by example and ensure that own compliance training is current
HR/EDI Committee	<ul style="list-style-type: none"> • Monitor the policy, ensuring that Compliance training is delivered to minimise risk to the University and people. • Approve the Compliance training matrix and rationale for Compliance training subjects. • Monitor and approve plans for any new Compliance training under development. • Monitor efficiency of Compliance training delivery. • Oversee Compliance uptake across Brunel and ensure support is provided as needed. • Lead by example and always ensure own Compliance training is current.
Audit and Risk Committee	<ul style="list-style-type: none"> • Review periodically compliance training completion and associated risk. • Lead by example and always ensure own Compliance training is current.
Senior Leaders/Heads of Departments	<ul style="list-style-type: none"> • Promote the benefits of being compliant and regularly review Compliance training for their department. • Identify risk within own department and ensure that colleague's complete relevant role specific training • Lead by example and always ensure own Compliance training is current
Managers	<ul style="list-style-type: none"> • Promote the benefits of being compliant and regularly review Compliance training for their teams. • Ensure colleagues are aware of the Compliance training they are required to complete and provide protected time to complete training. • Ensure that Compliance training is discussed during colleague Performance Development Reviews (PDR) and that specific role dependent training is scheduled and forms part of their agreed development plan for the year. • Regularly review the Compliance Training Matrix for their respective Department/College area and raise any recommendations for amendments or exclusions to the relevant SME.

	<ul style="list-style-type: none"> • Lead by example and always ensure own Compliance training is current.
Colleagues	<ul style="list-style-type: none"> • Undertake required Compliance training and ensure that they remain up to date and current. • Know which Compliance subjects are relevant to their role. • Agree and schedule (with their line manager) time to complete their Compliance training. • Notify their line manager and the OD Team if they are unable to complete training or attend a scheduled training for any reason. • Incorporate Compliance subject learning, knowledge and skills into the day-to-day aspects of their role.
Subject Matter Experts (SMEs), designated Leads and Compliance Trainers	<ul style="list-style-type: none"> • Undertake risk assessment and through training minimise risk in their respective topic area. • Ensure that the training content meets the minimum requirements as set out in legislation and in Policy. • Work with OD Team to plan delivery required to ensure Compliance across the whole organisation to ensure the effectiveness of learning transfer and outcomes, understanding of current knowledge and context as well as efficiency of delivery. • Review lessons learnt from related incidents and that learning outcomes and content reflect recommended improvements as soon as practicable. • Contribute to the evaluation, review and development of Compliance training as required. • Access reports and data to monitor Compliance for their subject area. • Monitor uptake of Compliance training within their respective subject area and work with Organisational Development to plan training to meet required compliance levels. • Where delivered as workshops (in person or face to face): <ul style="list-style-type: none"> ○ Ensure the delivery of scheduled training events and activities are sufficiently resourced (to avoid cancelations and delays in colleagues being able to complete Compliance training). ○ Ensure a register of attendees is obtained. • Ensure a range of training delivery methods are used to meet different learning needs. • Maintain their own continuous professional development and relevant knowledge and skills for their subject area. • Lead by example and always ensure own Compliance is current.
Organisational Development	<ul style="list-style-type: none"> • Work with SMEs to agree how Compliance training will be best delivered to ensure the effectiveness of learning transfer and outcomes, understanding of current knowledge and context as well as efficiency of delivery. • Support SMEs in finding appropriate providers for online modules. • Agree with SMEs which colleagues need to undertake which learning and make sure that this is clearly communicated to all colleagues and line managers as part of the Compliance Training Matrix.

	<ul style="list-style-type: none"> • Coordinate and implement the schedule of Compliance Training • Record and report on Compliance training • Monitor and support colleagues to complete Compliance training. • Ensure that colleagues and line managers can easily access learning. • Lead by example and always ensure own Compliance training is current.
HR Business Partners	<ul style="list-style-type: none"> • Monitor Compliance training rates of managers and colleagues within their respective business areas • Support achievement of Compliance training completion and targets within their respective business areas. • Lead by example and always ensure own Compliance training is current.
Associate Director HR/OD	<ul style="list-style-type: none"> • Report annually to the HR/EDI Committee and Audit Committee on Compliance training progress. • Monitor training completion and work with the OD team to implement campaigns and initiatives • Identify any issues or concerns with Compliance training to the HR/EDI Committee/Audit Committee • Schedule the renewal of this Policy in line with the required timescale, review the effectiveness and update as required. • Lead by example and always ensure own Compliance training is current.

Appendix 3:

Application process to seek subject approval to be included or significantly amended in the Compliance Training Matrix

Subject Title	
Aims	
Learning outcomes	
Learning Method	
Target Group and Frequency	
Dates, times and venue	
Provider (Internal or External)	
Number of study hours/days	
Related courses	
Associated Costs	<i>Please include budget information on how this will be funded.</i>
Administration Requirements	<i>Please state who will provide this support</i>
Supporting Evidence/reason for change	