



STAFF TRAINING AND DEVELOPMENT POLICY & PROCEDURE

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Table of revisions

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1. Introduction

Bright Holder is committed to developing a strong learning culture, in which everyone is able to achieve their full potential, and which will increase job satisfaction and support career development. As such, Bright Holder is committed to providing excellent training and development opportunities for its staff, which meet the operational and strategic objectives of the organization, as well as individuals' own learning aspirations and needs.

The Company is committed to ensuring that all members of staff are provided with the training they need to perform their jobs safely at all times. As such, the Company will maintain and keep under review a list of training that is mandatory for some or all staff members, and ensure that appropriate training is available at the required intervals.

The Company is aware that resources, including funding, time, and effective use of internal expertise, will be required to achieve success in this area. The Company is committed to identifying and allocating such resources as required, within the constraints placed on it. In addition, sources of external funding will be identified wherever possible.

The Company will ensure that all staff training and development activities are developed, managed and delivered with due regard to fairness and equity. All applications for staff training and development activities will be considered strictly on merit and relevance. Access to training and development activities will be monitored and reported by demographic group, as required by law. In addition, specific programmes will be developed to meet the needs of under-represented and minority groups within the workforce.

2. Purpose

This policy and procedure sets out the measures that the Company has in place to support its objectives in relation to staff training and development, and the responsibilities that staff at all levels have to ensure that the Company develops a strong culture of learning and continuous development.

The procedure sections set out the way the Company will deliver both mandatory and non-mandatory training.

3. Scope

The requirements for mandatory training including induction apply to all directly employed staff. The requirements for local induction apply to all new staff including those members of administrative staff employed on a temporary basis via agencies and staff employed on the staff bank. Non-mandatory training arrangements apply to all permanent staff and at the discretion of the Company can be made available to long term bank staff.

4. Definitions

For the purposes of this policy the following definitions will apply:

Staff Training and Development	Used to include all activities which aim to assist staff to maintain, update and enhance their knowledge, skills and capabilities. This includes formal, informal and on the job training, as well as a range of other learning and development activities including: electronic learning; self-managed learning; mentoring and coaching; and the use of shadowing and secondment opportunities.
Statutory training	Is that training which an employer is required to deliver and is determined by legislation, to ensure the safety of the workforce and those that come in contact with the workplace and include the applicable laws and instructions from the Regional Government of Kurdistan Region.
Mandatory training	Is that training which an employer requires its staff to receive to ensure that its workforce is competent to deliver the services of Mandatory training the organization; this will include 'generic skills' that the service determines are required by all employees and specific training for particular groups of staff.

5. Duties and responsibilities

5.1. Chief Executive

Will ensure that sufficient resources are committed to staff training and development such, that the aims and objectives of this policy can be achieved.

5.2. Director of Human Resources

Has overall responsibility on behalf of Bright Holder Board for the implementation of this policy. Their role is also to advise the Board and the Management Team of any risks of failing to deliver appropriate training to Bright Holder staff.

5.3. Human Resources Directorate

- To manage the annual training needs analysis (TNA) process and to lead on the planning, development, monitoring and evaluation of staff training and development activities in conjunction with key staff and the Staff Training and Development Committee.
- To produce the annual training prospectus to reflect training needs analysis.
- To support the Staff Training and Development Committee.
- To manage induction and INSET mandatory training days.
- To monitor and report attendances and staff compliance regarding mandatory training events, issuing sanctions for non-attendance where necessary.

5.4. Staff Training and Development Committee

- To facilitate and promote good practice in training and development for all staff in the Company.
- To refer decisions about priorities and resource allocation to other Company Committees (e.g. Management Team; HSE Committee..etc) where necessary.

5.5. Line Managers

- To ensure that staff are attending relevant mandatory training events, including Induction events, and follow up individual staff who fail to attend required induction/mandatory training escalating the issue to relevant Director if individual persistently fails to attend.
- To ensure that new staff (both temporary and permanent) receive local induction as per the Company's arrangements and to return the completed local induction check list to HR department within one month of appointment of a new member of staff.
- To ensure that details of all training and development needs identified via annual appraisal and Personal Development Plan process are forwarded to Human Resources to inform the TNA process.
- To identify team or service-wide training needs within their areas of responsibility as part of the annual training needs analysis, in conjunction with the HR (training) manager.
- To assist with delivery of staff training and development activities where appropriate.

5.6. Staff Training and Development Committee Chair

- To provide leadership in the area of staff training and development, working closely with relevant committees and key personnel, including the Human Resources Directorate to ensure that Bright Holder has appropriate induction, training and development programmes for staff at all levels.
- To chair the Staff Training and Development Committee.

5.7. All staff

- To take responsibility for their own training and development, including attending relevant induction and mandatory training events.
- To make all necessary arrangement to attend training events.
- To participate in the appraisal / personal development review process with their manager, at least annually, and to take up opportunities that are provided in support of their learning and development

needs, whether within their own department or centrally.

- To meet the training and/or professional development requirements of their professional body, where relevant.
- To seek appropriate authorization to attend training events, usually from their line manager.

6. Procedures

The procedures section is subdivided into the following sections:

Training Need Analysis Process

Appraisal and Personal development review Scheme

Induction Procedure

Mandatory Training procedure

Staff Training Prospectus

6.1. Training Need Analysis Process

- A. Bright Holder will undertake an annual Training Needs Analysis. (TNA) This will be led by the Human Resources Directorate according to a process agreed and monitored by the Staff Training and Development Committee. Full details of the process is at Appendix C. The aim of the training needs analysis will be to identify priorities for staff training and development. A separate but parallel process will be undertaken to assess the need for mandatory training see Appendix D.
- B. Priorities for staff training and development identified through the training needs analysis process will be discussed initially at the Staff Training and Development Committee and at other relevant forums, leading to an agreed annual Staff Training Programme for the Company.
- C. The TNA for non-mandatory and mandatory training will be used to develop and agree an annual training prospectus which will be made available to all staff via the intranet and through the circulation of printed copies to all departments

6.2. Appraisal and Personal Development Scheme

1. Bright Holder will maintain and keep under review an appraisal and personal development review scheme including guidance on its operation. The aim of the scheme will be to provide a fair framework for assessing performance, and to support learning, development, and career progression.
2. Bright Holder's policy is that all staff should have a well-structured appraisal / personal development reviewed at least annually with their line manager. The Company will monitor performance against this accordingly.
3. Development needs are identified, and a personal development plan ('PDP') will be mutually agreed between the member of staff and their manager. This plan should be reviewed and updated regularly as part of normal supervision. In addition, copies of all PDPs should be forwarded to Human Resources (Staff Training).
For those staff that have been in the Company employment for less than 12 months of the appraisal cycle, the managers are not required to complete the entire appraisal process. Though as an on-going basis and regardless of the length of appointment, development and performance management of the staff should be discussed between the manager and the staff.
4. Training sessions on the operation of the appraisal / PDR scheme will be provided for both line managers and staff.

6.3. Induction of New Staff

1. This section of the procedure sets out the Company's arrangements for ensuring the effective induction of all new staff (permanent and fixed term). Through its induction arrangements, the Company aims to ensure that it meets its health and safety and other statutory obligations and ensure that new staff become familiar with the organization, its management of risk and their roles in a timely and effective way. Local induction also ensures staff receive specific information and guidance on how to undertake their designated role in the organization.

6.3.1. Company-wide Induction Event

Bright Holder will run a Corporate Induction Session (i.e. Company wide) for all new staff four times a year.

All newly appointed staff will receive an invitation to the next available event in their offer of employment letter, and this will make clear that they are required to attend. In the event that a new employee is unable to attend the first Company -wide event after he/she commences employment, he/she will be invited to the following event.

Staff who fail to attend mandatory training events including induction, will be subject to sanctions. The details of these sanctions and which events these apply to are shown in Appendix B

6.3.2. Booking and follow up arrangements

- The new starter offer letter which is generated by HR will contain details of the induction date that the new member of staff is expected to attend
- The training administrator, or other nominated staff member will coordinate the event and ensure all attendees sign in; this sign in sheet is used as evidence of attendance
- All non-attendees will be followed up by the training administrator (via email) who will inform them of the next induction date and advise them that they are required to attend on that occasion. The training administrator will also advise their line manager of the nonattendance (by email).

Note: Part-time staff will be expected to attend induction, if the event falls outside their normal working hours' time off in lieu will be given.

6.3.3. Content of Bright Holder Induction

The Company -wide Induction event will be delivered by senior staff and will include input on the following topics:

- Welcome address
- HR matters including: support, training arrangements trade union arrangements; Human resources policies and staff benefits
- Health and Safety issues including slips trips and falls and care of the back (mandatory)
- Risk management including; incident reporting, investigation; hand washing; inoculation injuries (mandatory)
- Operational matters including: Operation risk assessment; Operation supervision...etc.

The programme for the event will be kept under review and updated in response to feedback and /or changes to the needs of the Bright Holder.

6.3.4. Local / Workplace Induction (All staff)

- Line managers will ensure that all new starters in their department (including those transferring to new employment within the Company, and staff on fixed-term contracts and secondments) will have an effective local induction into their new role within their new department. In order to assist with local induction the Company has prepared a checklist of topics that the line manager must cover with the new staff member 1 . There are two check lists one for permanent staff and one for short term agency staff.
- Line managers must ensure that new staff are taken through the local induction checklist during the first week of their employment. Once completed, a copy of the checklist, signed by both manager and new staff member should be sent to Human Resources (Staff Training), who will monitor completion of local induction. It is expected that the completed form will be returned to HR within 1 month of the person's start date.
- In the event that Human Resources (Staff Training) do not receive a completed local induction

checklist relating to a new staff member, the line manager will be contacted by email and reminded that the process should be completed as soon as possible, and confirmation sent in the form of a signed checklist.

- Failure to return completed local induction checklists, within two months of a new staff member starting work will lead to sanctions being applied, see Appendix B

6.4. Mandatory Training procedure

6.4.1. Training Needs Analysis

Bright Holder will determine what it will include in its Mandatory TNA with reference to legal requirements; and requirements identified by the Company. The process followed is described at Appendix D. Following the analysis a table of requirements will be produced and published in the Staff Training Prospectus which summarizes the training topics; frequency of training and which groups of staff are required to attend training.

6.4.2. Arrangements for the delivery of mandatory training

Mandatory training is delivered by subject specialists who are either Company staff, or occasionally, accredited external trainers who are required to teach in accordance with the Company's policies and procedures. Training is delivered in four main ways: at induction, at INSET, by specialist training and by e-learning. Details of method of delivery are shown on the training matrix. With the exception of a small number of specialist mandatory training requirements (as shown on the TNA) most training is delivered in a day long INSET training session which is run twice yearly and staff are required to attend once every two years. This is managed by HR (Training).

6.4.3. Invitations and attendance at other mandatory training

The following mandatory training attendance is managed by the Health and Safety Manager. Those staff who are required to attend these sessions are identified on the TNA

- Manual handling training
- Conflict resolution training
- First aider training ☑ Basic life support training
- Ladder safety training (working from heights)

The Health and Safety Manager will arrange for external trainers to attend the Company when there is a sufficient number of staff who require training. The Health and Safety Manager will liaise with HR to ensure her local data base of staff who require the training is up to date The Health and Safety Manager will keep a local data base to log attendance and will retain documentation in relation to the training including attendance sheets and communication with the trainers.

Note: As only a small number of Bright Holder staff require the above training, the Company accepts the risks that there may be a delay in training some individuals who are unable to attend fixed training days, however this is judged to be a small risk as the turnover amongst these staff groups is very low.

6.5. Staff Training Prospectus

- A. Based on the results of the annual training needs analysis, the Company will publish an annual Staff Training Programme (Prospectus) covering both mandatory and non-mandatory training opportunities available for staff, in the year ahead. This will include a clear statement of which events are mandatory. The Staff Training Programme will include: course descriptions; who the activities are designed for; booking and administrative arrangements; and contacts for further information.
- B. In addition, each Section directorate will publish its own programme of training and development activities, including details of scientific meetings relevant to the work of their directorate, and other topical workshops e.g. related to research. Where possible, the central Staff Training Programme will detail opportunities and

activities developed and delivered locally within Directorates, so that all staff are aware of training that may be of interest and relevance to them.

7. Training Requirements

Mandatory training requirements are summarized in the Mandatory training TNA at appendix D. Non mandatory training opportunities are published annually in the Staff Training Prospectus available from the Company intranet.

8. Process for monitoring compliance with this Procedure

The Company will monitor compliance with this policy and procedure in the following way: HR will maintain a training data base to record induction and mandatory training. This will be reviewed monthly and updated with leavers and starters from a list generated from ESR.

The Health and Safety Manager will hold a separate spread sheet and will liaise with local managers to ensure that s/he has a full list of staff requiring specialist mandatory training.

Induction and local induction – attendance

Attendance at induction will be monitored on a quarterly basis by the corporate governance and risk workstream which will receive a report prepared by HR (training) covering attendance at induction, follow up of non-attenders and return rates for local induction forms. Data will show performance against Company KPIs (see Appendix F).

Induction – content

The HR (training team) will review feedback received from participants and consider feedback in monitoring of the programme, whilst ensuring that it meets core topic requirements.

INSET (mandatory training day)

Attendance at INSET will be monitored on a quarterly basis by the corporate governance and risk workstream which will receive a report prepared by HR (training) covering attendance at INSET and follow up of non-attendance. Data will show performance against Company KPIs (see Appendix F).



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APPENDIX A

APPENDIX B

Sanctions for Non- Attendance and Incentives for Attendance at Mandatory Training

Introduction

Many organizations suffer from non-attendance of staff to trainings, training events includes:

- Company-wide Induction (including HSE and Security induction)
- Local Induction ☐ Safeguarding / Child Protection
- Information Governance

Proposed sanctions to improve attendance

Having considered various options, the following proposals are being put forward to address non-attendance. It is also proposed that these sanctions should be applied to the individuals concerned as well as to line managers, in circumstances where team members fail to attend training.

Sanctions to be applied to individuals Where individuals fail to attend the necessary training activity, it is proposed that the following sanctions should be applied:

- Where a staff member is due an incremental increase, this increase will not be applied until all relevant trainings have been completed.
- Staff will also not be able to access training funds for their personal development or attend other non-mandatory training events necessary for their development unless they have successfully completed their mandatory training.
- Staff will also not be eligible to apply for internal posts such as secondments or promotion opportunities unless they have attended necessary mandatory training.

Sanctions for Senior Managers Directors are required to ensure that staff in their Directorate have attended training. In circumstances where a Director has attended training but members of their Directorate are not compliant, it is possible that the Director could also be subject to sanctions, including non-progression of incremental pay.

It is expected that, as a part of their management role, Directors will work actively with staff to ensure their attendance at mandatory training.

Action to address Local Induction

The responsibility for completion of Local Induction rests with both the new appointee and their line manager (i.e. the appointing officer). Where these are not returned within two months of the staff member commencing working, the sanctions listed above will be applied to both the member of staff and their line manager. However, if the member of staff provides evidence showing that they have made reasonable attempts to complete this with their manager, then sanctions will only be applied to their manager. All sanctions will be lifted, upon completion and return of checklist.

Incentives and Rewards for teams with high levels of attendance (well performing teams)

It is also proposed that positive rewards and incentives could be made available to high performing teams.

Conclusion and Recommendations

In order to facilitate the above processes, it is proposed that each member of staff should be issued with a mandatory attendance card, containing details of all the mandatory training the employee has attended and is required to attend in any year. This card will need to be provided to line managers during appraisal and at other intervals during the year for signing and approval. The member of staff will be required to indicate their attendance at the required mandatory events on their cards.

APPENDIX C

TNA process (non-mandatory training)

STAFF TRAINING & DEVELOPMENT COMMITTEE Process for Training Needs Analysis

A. INTRODUCTION

This paper sets out the process for carrying out training needs analysis (TNA) within Bright Holder.

Systematic and inclusive training needs analysis is central to the Company's overall aim of co-ordinating the various important development activities within the organization and establishing a coherent approach to learning and development for all staff. The Staff Training and Development Committee has an important role in this, including keeping this process under review, scrutinizing the results of the annual TNA process, and agreeing on priorities for staff training and development activity.

B. BACKGROUND TO TRAINING NEEDS ANALYSIS

Training needs analysis is based on the belief that where possible, training and staff development provision should be based on the accurate identification of learning needs. Perhaps the best definition comes from the Chartered Institute of Personnel and Development (2007) i.e. "it is an analysis of any gaps in the knowledge, skills or attitudes of employees which identifies what they need to learn to be fully competent in the jobs they will be doing now - or in the future." Note, however, that the term "training needs analysis" is not meant to imply that the means of filling the gaps is always through formal training – learning needs may be met by a range of means and interventions.

A systematic and inclusive process will provide the Trust with a number of benefits, including the development and retention of key staff in a coherent and cost-effective way, linked with individual, service, and organizational objectives.

Training needs analysis will be undertaken at a number of levels notably:

1. Individual needs – usually discussed at the appraisal meeting. Within this organization, the Trust's Appraisal/Personal Development Review process is used.
2. Department or service needs – line managers play the key role here, thinking about the demands on the service in the future, and/or the ways in which the service is expected to develop. Analysis at this level is also based on work undertaken at the individual level.
3. The whole organization's needs – usually undertaken by the HR Staff Training and Development Team. This is likely to require a survey to understand the amount and types of learning needed overall to ensure all staff have the right knowledge skills and attitudes. This may be based on analysis carried out at the other levels, as well as scrutiny of other sources of information such as the annual Staff Attitude Survey and the Company's Annual Plan.
4. Training needs will ideally be described in terms of required knowledge and skills including with reference to agreed knowledge and skills frameworks for particular types of work or posts.
5. The types of information that will be collected to inform the training needs analysis will include:
 - a. The information contained within individual staff members' personal development plans (PDPs) i.e. the statements of staff's learning needs, as agreed with their line managers.
 - b. Business and organizational objectives – there may be items in the business plan that have an influence on training needs, and the commitments to training made in an organization's policies are also highly relevant.
 - c. Technology and organization of work i.e. how jobs are done and the technologies used. If changes are planned (e.g. the introduction of an IT system) this is likely to impact on training needs.
 - d. Employee demographics – e.g. whether significant numbers of joiners are expected, and how this might affect training needs.
 - e. Job roles and responsibilities – whether these are likely to be changing to meet particular service needs or developments.

- f. Education / vocational training framework – e.g. the requirement that people in particular roles become qualified or gain additional qualifications in the future.
 - g. Other external requirements – especially those coming from the law, “the centre” (e.g. Monitor), or other authorities. These will typically lead to an analysis of training that is mandatory – it has to be done.
 - h. Other internal data – e.g. the results of employee surveys, and of course the evaluations of previous training and development activities.
6. Training needs analysis will be carried out in plenty of time for those responsible for managing staff training and development activities to be able to prioritise and formulate training plans for the organisation. Key steps after the training needs analysis will then be:
- a. preparation of a report of overall training needs, to form the basis of discussions on training and development
 - b. prioritization of learning needs and;
 - c. the setting of plans. The factors presented in the brief overview above have all been considered in developing the following timetable for training needs analysis within the Trust, which is presented in the following section.
7. The factors presented in the brief overview above have all been considered in developing the following timetable for training needs analysis within the Trust, which is presented in the following section.

C. PROCESS FOR TRAINING NEEDS ANALYSIS

The process, including time-tabling, is set out here. Some of the proposed stages are already in place within Bright Holder, but need integrating within an effective overall approach. Others will be new and will need consideration.

Stage/Month	Activity	Stakeholder
Jan-Mar	Appraisals carried out / PDPs agreed and sent to HR for recording. Heads of discipline and Managers chased to achieve target of 75% +	All staff with line managers. HR
Apr-May	Content of PDPs analyzed and summarized – information broken down by department / service and Company-wide	HR
May	Summaries of training needs by department / service circulated to line managers for info. and a request for any further training needs (i.e. team-wide needs) to be submitted to Human Resources Manager	HR and line managers
Apr-May	Other data gathered by HR from relevant sources especially: - review of training that has mandatory status (H&S, risk and other legal obligations) - review of training that may be required by other external agencies ('Monitor' / SHA / CNST / other) - Business Plan / organizational objectives / policies - Issues raised by staff attitude survey - Evaluation of previous year's activities	HR H&S Mgr / Directors and Managers Risk Manager
June	Report of overall training needs based on Apr-May written and presented at Staff Training Committee. Initial discussion about priorities, funding etc.	HR
Jun-Sep	Process of discussing and agreeing priorities, putting plans in place continues, overseen by Staff Training and Committee.	HR , STC and other training committees
Sep	Staff Training Programme finalized and communicated	HR

APPENDIX D
TNA Process Mandatory training
Statutory and Mandatory Training Needs Analysis (TNA) Process

1. Introduction

This document summarizes the results of a Trust-wide risk management training needs analysis (TNA) in relation to Statutory and Mandatory Training.

The purpose of the statutory and mandatory training needs analysis was to:

- Fulfil the TNA cycle as set out in the Staff Training Policy
- Ensure that the TNA fully considered the specific requirements as detailed in the related policies
- Inform the production of a training prospectus that accurately reflects the current needs of the Company

2. Training Needs Analysis Process

The TNA process considered the following information:

- Subject area.
- Summary of how the training need was identified (including national guidance and legislation, requirements of regulatory bodies, Trust policies etc.)
- Summary of the staff involved/consulted with in the TNA process.
- Description of how the staff groups requiring the training were identified.
- A description of target staff groups, content of training, delivery method and duration, delivery mode and frequency of updates.
- Gap analysis and, where required, a training delivery action plan.

Line managers and professional leads/discipline heads were also asked to review the training needs identified for different staff groups (based on the previously agreed matrix) and to notify the Head of Learning and Development of any issues or required changes.

Based on the data received from both of these sources the TNA matrix was updated, and where required, minor amendments made to relevant policies to ensure accurate cross referencing and reflection of agreed delivery plans and frequency of training was consistent in the current documents.

The TNA is subject to an annual review to ensure that it remains fit for purpose.

3. Implementing the TNA

The TNA for mandatory training will be implemented as follows:

- The TNA schedule has been updated in line with the process detailed above.
- The updated Annual Staff Training Programme will be updated to reflect the findings from the TNA.
- The HR (Staff Training) team will maintain records for all staff completing training. Managers whose staff fail to attend at the required intervals will be notified.