

POLICY STATEMENTS

Animal Therapy Solutions Limited (ATSL) works within the following Policies to maintain operational standards:

1. Equality and Diversity Policy

1.1 ATSL is committed to promoting equality of opportunity when providing training and recognise the provisions of the Equality Act 2010:

- 1.1.1 ATSL works to engage with all students regardless disability, gender, sexual orientation, race, religion, or marital status but has regard for the safety of students. For reasons of personal safety in the light of the unpredictability of horses, the course is not recommended for women currently pregnant.
- 1.1.2 No discrimination is made relative to age, save to say that a pre-requisite of the course is that applicants can demonstrate suitable industry experience, making it unlikely that applicants under 21 years of age would be able to meet such criteria. A benchmark minimum age on application of 21 years is therefore applied.
- 1.1.3 Equine massage requires therapists and students to be physically fit in order to be able to carry out the role competently and safely with the welfare of the student, owner/client, and animal in mind; and physically able to handle a horse unassisted. Therapists and students also require the mental capacity to understand and apply functional anatomy; and to anticipate, empathise with and manage the behaviours of the horse, howsoever expressed.

1.2 Equal opportunities are promoted by ATSL and we are committed to:

- 1.2.1 Ensuring equality of opportunity for all students
- 1.2.2 Preventing unlawful occurrences of direct discrimination, indirect discrimination, harassment and victimisation
- 1.2.3 Meeting legal obligations under the Equality Act 2010
- 1.2.4 Utilising materials which use, where relevant, images and language which are representative of society
- 1.2.5 Promoting a harmonious training environment by requiring students to adhere to our Code of Ethics and Conduct

1.3 ATSL undertakes to offer Learner Support:

- 1.3.1 ATSL is committed to providing access and individual learning support where required
- 1.3.2 ATSL offers support and guidance to learners who have declared a particular learning need which is supported by a statement of learning need where such support can be effected without detriment to the professional standards of the course and will enable the student to safely and competently complete the course to become a safe and effective practitioner.

2. Complaints, Compliments and Feedback Policy

- 2.1 ATLS aims to ensure that students, instructors, visiting professionals and any other persons related to training delivery enjoys a fair and equitable experience with other persons and all procedures with which they come into contact.
- 2.2 ATSL recognises that any person having reasonable cause for complaint should receive prompt restitution to maintain the smooth operation of the course for all concerned, and continuance of a beneficial learning process
- 2.3 In the event of any student wishing to raise a complaint the Quality Systems Procedure 5: Complaints will apply.
- 2.4 Further evaluation in the event of a complaint:
 - 2.4.1 ATSL will consider the nature of all complaints impartially to assess whether the matters raised have any impact on other students and ensure that support is provided where this is found to be the case
 - 2.4.2 In the event of a complaint being upheld as reasonable, ATSL will take immediate steps to manage, readjust, repair or improve the position.
 - 2.4.3 In the event of any complaint being raised, ATSL will assess whether processes could be adjusted to limit the issues raised in the future.
- 2.5 Feedback will be invited from students at the end of the course regarding content, instructor quality, delivery method and suggestions for improving the learning experience. All feedback will be evaluated carefully whether a criticism, complaint or feedback. All input received will be impartially considered and amendments made to existing practise where to do so would be practical or beneficial to students always provide that this can be implemented without detrimentally affecting the effectiveness of delivery of the course content.

3. Appeals Policy

3.1 Students may appeal against

- 3.1.1 marking decisions of summative final assessments after the maximum amount of retakes (two for each element) has been exhausted
- 3.1.2 Exclusion from the CertT ESM course for breach of the Code of Ethics and Conduct
- 3.1.3 A decision finding against the student under the Malpractice and Maladministration Policy

3.2 Method of appeal:

- 3.2.1 Appeals should be made in writing enclosing all supporting documentation to Helen Tompkins, Director of ATSL within 14 days of the decision appealed. Students should keep a copy of their appeal and all supporting documentation.
- 3.2.2 The appeals process is detailed in the Quality Procedures documents number 4: Appeals.

3.3 Further evaluation in the event of an appeal

- 3.3.1 ATSL will consider the nature of all appeals impartially to assess whether the matters raised have any impact on other students and ensure that support is provided where this is found to be the case
- 3.3.2 In the event of an appeal being upheld as reasonable, ATSL will take immediate steps to manage, readjust, repair or improve the position.
- 3.3.3 In the event of any appeal being raised, ATSL will assess whether processes could be adjusted to limit the issues raised in the future.

4. Malpractice/Maladministration Policy

4.1 ATSL promotes strong administrative practice and endeavours to ensure that students receive a high quality learning experience designed to lead to achievement of the final award on genuine effort and merit. ATSL will take swift action to address any activity which may compromise this situation

4.2 Definitions:

4.2.1 Malpractice includes (but is not limited to):

4.2.1.1 On the part of students: attempting to mislead ATSL as to qualifications or entitlement to be accepted on to the course; providing false references; plagiarism; cheating in examinations or assessments; attempting to influence assessors or the outcome of tests or assessments

4.2.1.2 On the part of ATSL: Providing insufficient lecture time duration or cutting short sessions without reasonable cause; omitting module elements; treating a student preferentially above others.

4.2.2 Maladministration includes (but is not limited to):

4.2.2.1 On the part of ATSL: Failure to properly keep or maintain student documentation; losing test or assessment papers; registering students for the wrong course; failing to manage personal data in accordance with proper procedures (Data Protection Act)

4.3 Procedure

4.3.1 The procedure to be followed in the event of a complaint of maladministration or malpractice is set out in Quality Procedure 6: Malpractice and Maladministration

4.4 Further evaluation in the event of a complaint under this policy

4.4.1 ATSL will consider the nature of all complaints under the Malpractice/Maladministration policy impartially to assess whether the matters raised have any impact on other students and where this may have been the case will consider the requirement to make adjustments or provide further assessment opportunities to avoid detriment.

4.4.2 ATSL will ensure that processes are amended as necessary to avoid a repeat of the situation where reasonably possible.

5. Health and Safety/Accident Reporting Policy

5.1 Safety of premises

- 5.1.1 The current yard premises address at which the courses will be delivered is detailed in the appendix
- 5.1.2 ATSL works closely with the owner of the yard premises to ensure that all necessary steps are taken to ensure safe premises, equipment and resources for staff, related professionals and students. Please see attached Health and Safety Policy in tabular form.

5.2 Risk Assessments

- 5.2.1 A risk assessment of premises and resources (including animals) will be undertaken at the commencement of the course and the outcomes communicated to the students and staff
- 5.2.2 The risk assessment will be reviewed at the commencement of each teaching weekend in order to accommodate any activities at the yard premises which may materially affect the risk assessment guidance.
- 5.2.3 The risk assessment will be reviewed at the beginning of each practical session having regard to the particular conditions prevailing at the time of teaching, and to the specific animals to be used.
- 5.2.4 A risk assessment form is attached

5.3 RIDDOR

- 5.3.1 Responsibility for reporting accidents under RIDDOR lies with the person in charge of the premises as detailed in the Policy Appendix. Incidents will be reported to the responsible person immediately.

5.4 Procedure

- 5.4.1 In the event of an accident, the Accident Procedure will be followed (see Quality Procedures 9: Accident Procedure)

5.5 Insurance

- 5.5.1 ATSL holds current Errors and Omissions, Public and Products Liability Insurance
- 5.5.2 ATSL will ensure the premises holds suitable and sufficient insurance cover

6. Children and Vulnerable Adults/Safeguarding Policy

6.1 ATSL recognises the general need to take necessary steps to safeguard and promote the welfare of children, young people and vulnerable adults who may come in contact with staff or students.

6.1.1 Persons under 21 years of age who are not physically capable of handling a horse unassisted will not be permitted to enrol upon the CertT ESM course as students

6.1.2 The learning environment for students on ATSL courses will not normally involve interaction with persons not enrolled on the CertT ESM Course. Practical lectures will in the normal course of events take place in a communal barn with all students practising together and members of the public will not generally be permitted entry. However in the unlikely event that a third party unrelated to the CertT ESM course is present:

6.1.2.1 Where a vulnerable adult is present in the vicinity of treatment due to their relationship to the animal being treated, ATSL will ensure that a third party responsible adult is present to ensure the physical safety of that individual and may require the responsible adult to ensure suitable distance of the vulnerable person from the animal being treated. In such event, ATSL will not leave a student unattended with a vulnerable person or animal. ATSL will not accept responsibility for the conduct of a vulnerable person where all sensible and reasonable precautions (including removal from the vicinity) relating to the vulnerable person have been suggested or undertaken to the best of ATSL's ability.

6.1.2.2 Where a child (U-16) or young person (U-18) is present in the vicinity of treatment due to their relationship to the animal being treated (ie ownership) ATSL will use best endeavours to ensure that the child or young person is supervised by a parent or member of staff of the yard premises.

6.1.2.3 For the avoidance of doubt, physical interaction between instructors or students of the CertT ESM course and any child, young person or vulnerable adult present is unnecessary and will not be permitted.

6.2 Reporting

6.2.1 Where ATSL or a student of any course raises safeguarding concerns about a member of the public or colleague with whom they may come in to contact within the course location/study environment then an immediate report will be made:

6.2.1.1 in the case of a complaint against a fellow student or ATSL Staff member to the supervising instructor or to the Safeguarding Officer at the yard premises, whichever preferred; or

6.2.1.2 in the case of a child, young person or vulnerable adult to the Safeguarding Officer at the yard premises or the Police.

7. Data Protection Policy

7.1 Animal Therapy Solutions Limited is registered with the Information Commissioner's Office pursuant to the Data Protection Act

- 7.1.1 Personal data collected about individual students includes: Name, date of birth, address, next of kin, email address, phone number, qualifications, insurer. This data is provided voluntarily by the students/applicants and is held to ensure smooth communication with the student during the duration of the course or, in the event of an accident, communication with next of kin.
- 7.1.2 The data will be held for the duration of the course and is stored electronically on an external hard drive which is disconnected from the computer having access thereto unless a backup is being performed or access to the specific data is required. The system having access to the hard drive is protected by anti-malware and anti-virus software.
- 7.1.3 On successful conclusion of the training course, students will be asked to give specific permission for their personal data (name, address and email details) to be passed to the Equine Sports Massage Association for the purposes of administering professional membership

8. Animal Welfare Policy

8.1 Animal Welfare Legislation and Guidelines:

- 8.1.1 The minimum standard of welfare required by the Animal Welfare Act 2006 ("a life worth living") condenses the former Five Freedoms (as identified by the Brambell Report in 1965) and is further augmented by the DEFRA Code of Practice for the Welfare of Horses, Ponies, Donkeys and their Hybrids (2009) ("DEFRA 2009"). DEFRA 2009 provides guidance on housing, feeding regimes, tack and veterinary care. Paragraph 8.3 below details the systems in place to ensure these guidelines are met.
- 8.1.2 The Animal Welfare Act 2011 requires veterinary surgeons and keepers of animals to ensure the proper care and husbandry of animals and protect them from suffering. The guidance within DEFRA 2009 is applied to test any alleged welfare compromise. The yard premises at which the CertT ESM is taught are an annually assessed Approved Livery Yard and also approved for apprenticeship training purposes.
- 8.1.3 The Certificate of Training in Equine Sports Massage requires practise and teaching to involve the use of live horses whose welfare will be constantly monitored.

8.2 Awareness of the responsibility for the duty of care to animals

- 8.2.1 Students are made aware by the Code of Ethics and Conduct that there is a duty of care to the horses who may be used for practical sessions on training courses. Students are required to read and sign the Code of Ethics and Conduct prior to commencement of the course and adhere to it throughout.
- 8.2.2 Students will also expressly cover the responsibility of the therapist for the welfare of the client horse (and any horses contributing to the training course) during the module of study entitled "Professional Skills", and this understanding is tested summatively in final exams.

8.3 Equine involvement on ATSL training courses

- 8.3.1 Horses will be used for the purpose of massage practise, anatomy and palpation practicals, gait analysis and conformation analysis.
- 8.3.2 All horses taking part in the course will be volunteered by their owners and the owner's written permission obtained. An instructor will always be present with the horses and students.
- 8.3.3 Practical sessions will take place indoors in a barn with individual stables for each horse and with the following welfare conditions observed:
 - 8.3.3.1 Where the horses are not being massaged or used for practical demonstration, soft standing, hay and water will be provided.
 - 8.3.3.2 Suitable equine clothing for the ambient temperature will be provided.
 - 8.3.3.3 Horses will be restrained only by headcollar and rope during practical work unless for reasons of safety or yard rules, a bridle is used during dynamic gait analysis
 - 8.3.3.4 Horses will be used for three hours maximum on each day which time will not involve constant student interaction (horses will thus be free to eat and drink) and this time will not impact on normal routines of turn out or feed times.
 - 8.3.3.5 Any horse presenting as lame or under the current care of the yard veterinarian for an acute condition will be excluded from the practical sessions unless the vet specifically approves inclusion on the basis that massage may benefit the presenting condition.

8.3.3.6 Any horse exhibiting signs of distress or discomfort will be removed from practical sessions. Helen Tompkins is the Veterinary Physiotherapist to the horses at the yard. is familiar with the horses which will be used and will maintain a constant assessment of equine behaviour.

9. Substance Abuse Policy

9.1 Zero tolerance policy

- 9.1.1 ATSL operates a zero tolerance substance abuse policy towards students, related professionals, and instructors during the hours of the delivery of the course and on the yard premises.
- 9.1.2 Any person reasonably suspected of being under the influence of drugs, alcohol, legal or illegal substances or attempting to use such substances during the duration of the delivery of the course session or day will be asked to leave the premises and will be summarily excluded from the course at whatever stage including immediately prior to examination

9.2 Smoking

- 9.2.1 Smoking represents an extreme hazard to safety and life in stable yards and is permitted on the yard premises only within designated smoking areas.
- 9.2.2 Any person failing to adhere to this policy with regard to smoking or in breach of any signage at the yard premises in relation to smoking will be asked to leave the premises for the remainder of the day and will miss all associated lectures and practical content delivered during that period.

9.3 Appeals and LANTRA notification

- 9.3.1 Any breach of the Substance Abuse policy will be notified to LANTRA immediately.
- 9.3.2 A right of appeal against summary exclusion from the course will be available but the right of appeal will require the students to demonstrate beyond all reasonable doubt that substance abuse had not taken place.

10. Managing Conflict of Interest Policy

- 10.1 Conflicts of interest may arise within the provider in several possible spheres:
- 10.1.1 Between directors' responsibilities to students and to ATSL as a successful training provider
 - 10.1.2 In Directors' responsibilities between students
 - 10.1.3 In Directors' responsibilities between Students and related professionals, visiting experts
- 10.2 ATSL confirms that its primary duty will always be to the student to ensure a fair, constructive, equal and comprehensive learning experience
- 10.3 Any complaint or suggestion of bias, unfair treatment, or conflict of interest will be immediately referred to LANTRA for investigation. ATSL will also ask one of the external examiners or visiting experts unrelated to the complaint to consider the matter so that an opinion can be sought from a respected, impartial and knowledgeable industry expert.

11. Recognition of Prior Learning Policy

- 11.1 Students successfully completing the Career Course will be entitled to apply for membership of the Equine Sports Massage Association
- 11.2 Having regard to paragraph 11.1 above, the Equine Sports Massage Association has various other prerequisite requirements for membership. These requirements are embedded within the entry requirements for the career course:
- Age 21 at time of application
 - Minimum 3 years experience working in a professional equine yard supported by references
 - 5 GCSEs grade A-C including English (or equivalent qualification standards)
 - Human Massage, Anatomy and Physiology qualification (preferably Level 3 or above)
- 11.3 ATSL recognises that some students wishing to apply for inclusion on the Equine Massage Career Course may not exactly meet the pre-requisite criteria but may be able to demonstrate very similar or equal experience. Experience which may be acceptable would be:
- 11.3.1 Veterinary Physiotherapy or other Higher Education Equine Therapy based degree training
- 11.3.2 Lifelong involvement in own equine related business or significant personal equine involvement. For the avoidance of doubt, simply owning a horse will not suffice.
- 11.4 ESMA require a qualification in Human Massage including Anatomy and Physiology at Level 3. ATSL require this qualification to have been attained prior to the commencement of the course. ESMA recommend that if the qualification is not stated to be Level 3 it should include 5 case studies seen 4 times each, and a minimum of 100 hours guided study.
- 11.5 The course involves significant written and theoretical content and successful graduates will be expected to communicate easily, successfully and clearly with clients, vets, insurance companies etc both verbally and in writing. With the exception of students needing Learning Support for an identified need, failure to meet the required academic qualifications will preclude admission.
- 11.6 Where a student does not meet the criteria of a massage qualification at Level 3 (but does hold a human massage certificate) **AND/OR** cannot demonstrate 3 years experience working in an equine yard, students may instead submit the following portfolios which will be considered by ATSL at their discretion and referred to ESMA if necessary:
- 11.6.2 Re: Massage qualification: submission of a written essay discussing the various massage techniques applicable to the human, evaluation of each, description of method and effect. Max 2000 words.
- 11.6.3 Re: Equine experience: Submission of two 2000-word (max) case studies demonstrating the student's investigation of two separate professional equine yards (eg competition, breeding, starting/training) which should clearly demonstrate that the student has spent time at each yard, and understands their operation and the reality of the equine industry and can competently discuss the same.

POLICY DOCUMENTS APPENDIX

1. Address of the premises at which the training will be delivered

Newhall Equestrian
Budlake
Exeter
EX5 3LW

Proprietor: Mrs K Oram-Evennett

2. Person at premises responsible for Safeguarding

Mrs K Oram-Evennett

3. Person responsible for reporting under RIDDOR

Mrs K Oram-Evennett

4. Location of Document Storage

Address: Sheltercombe Cottage, Bratton Fleming, Barnstaple, Devon EX32 7JL

Nature of Documents:

Hard copy/paper documents

Digital data held on a back up hard drive which is detached from the main PC through which it is accessed