



LEARNER HANDBOOK 2018/2019



Contents Page

Page Number	Subject
	Page 3-5
Staff Contact details	Page 3-5
Workshops and Classrooms	Page 6-8
Learner ID Card	Page 8
Learner Representation and Feedback	Page 9-10
Oyster cards	Page 11-12
Learner Living Costs and Discounts/Welfare benefits	Page 13-15
Support in the classroom	Page 16
General Health and Useful Support Contacts	Page 17-19
Library Services	Page 20
Recommended Books, Magazines, Websites, Blogs and Trade Shows	Page 21-27
Equality and Diversity Policy	Page 28-31
Attendance and Punctuality Policy	Page 33-36
Transfer Policy	Page 37
Break in Learning Procedure	Page 38-39
Withdrawal Policy	Page 40-42
Malpractice Policy	Page 43-45
Appeals Procedure	Page 46
Appeals Form	Page 47
Health and Safety Policy	Page 48-55
Bullying and Harassment Policy	Page 56-60
Complaints Policy	Page 61-62
Complaints Form	Page 63
Safeguarding Children, Young People and Vulnerable Adults Policy	Page 64-70
Admissions Policy	Page 71-74
Admissions Process	Page 75-77
Terms and Conditions of Payment Policy	Page 78-80
Prevent Policy	Page 81-85
Learner Disciplinary Policy and Procedure	Page 86-90
Data Protection Policy	Page 91-102

Staff Contact Details

Head of Academy

Sofie.Boons@baj.ac.uk

020 7405 0197 ext 8004

Head of Programmes: Kate Rieppel

kate.rieppel@baj.ac.uk

020 7405 0197 ext 381

Head of Apprenticeships: Lili Capelle

lili.capelle@baj.ac.uk

020 7405 0197 ext 381

Head of Quality: Adam Russell

adam.russell@baj.ac.uk

020 7405 0197 ext 383

Pastoral Care Leader: Michelle Springer

michelle.springer@baj.ac.uk

020 7405 0197 ext 1019

Head of Analysis and IT: David Henderson

David.henderson@baj.ac.uk

020 7405 0197 ext 367

Head of Admissions and Recruitment: Stefania Costa

Stefania.costa@baj.ac.uk

020 3588 0520 ext.5009/5011

Recruitment Manager: Rosina Arena

rosina.arena@baj.ac.uk

020 7405 0197 ext 1021

Marketing Manager: Rebecca Prowse

rebecca.prowse@baj.ac.uk

020 7405 0197

Financial Controller: Salman Sheikh

finance@britishacademyofjewellery.com

020 7405 0197

Recruitment - Responsibilities at the Academy

The Recruitment team offer a wide range of support to help you to achieve your goals. The staff can advise you on matters such as:

- Course content, eligibility and application
- Fees

Location of department: We are based at British Academy of Jewellery, Morley House

Opening times: Monday – Friday from 9 am – 5 pm

Admissions – Responsibilities at the Academy

The Admissions team offer a wide range of support to help you to achieve your goals. The staff can advise you on matters such as:

- Course eligibility
- Fees and funding
- Financial support
- Student Oyster Cards

Location of department: We are based at Langdales British Academy of Jewellery, 5 St Cross Street, London EC1N 8UA

Opening times: Monday – Friday from 9 am – 5 pm

Leander Ward Admissions Manager Telephone 020 7405 0197 ext 375 Leander.Ward@baj.ac.uk	Jose Perez Admissions Officer Telephone 020 7405 0197 ext 361 Jose.Perez@baj.ac.uk
--	--

Apprenticeships Department

Location of department: We are based in two locations

London site: Langdales British Academy of Jewellery, 5 St Cross Street, London EC1N 8UA
British Academy of Jewellery,

Birmingham site: The Assay Office, 1 Moreton Street, Birmingham, B1 3AX

Opening times: Monday – Friday from 9 am – 5.30 pm

Telephone Number: 020 7405 0197

Lili Capelle Head of Jewellery Apprenticeships lili.capelle@baj.ac.uk 020 7405 0197 ext 381	Lisa Khosla Centre Manager Employer engagement Lisa.khosla@baj.ac.uk 01216 550 105
Miranda Sharpe (Birmingham) Level 2 Jewellery Manufacture Tutor miranda.sharpe@baj.ac.uk 01216 550 105	Chieh Ni (Birmingham) Level 3 Jewellery Manufacture Apprenticeship Tutor chieh.ni@baj.ac.uk 01216 550 105
Ori Lamm Level 2/3 retail Assessor Ori.Lamm@baj.ac.uk 020 7405 0197 ext 1120/2004	Rosina Arena Learner Engagement Consultant Rosina.Arena@baj.ac.uk 020 7405 0197 ext 1021
Leszek Jamro Level 2/3 Jewellery Manufacture Apprenticeship Tutor Lesek.Jamro@baj.ac.uk 020 7405 0197 ext 1120/2004	

Teaching and Learning Department

Location of department: Morley House Mezzanine Level

British Academy of Jewellery, 26-30 Holborn Viaduct, Holborn, London EC1A 2AT

Opening times: Monday – Friday from 9 am – 5:30 pm

Telephone Number: 020 7405 0197 ext 380/ 381/ 382

Phoebe Coleman Tutor Phoebe.Coleman@baj.ac.uk 1120/2004	Jack Meyer Tutor jack.meyer@baj.ac.uk 1120/2004
Leszek Jamro Tutor Leszek.Jamro@baj.ac.uk 1120/2004	Nicholas Yiannarakis Tutor nicholas.yiannarakis@baj.ac.uk 1120/2004
Rebecca Cheeseman Jewellery Manufacturing Subject Lead Rebecca.Cheeseman@baj.ac.uk 1120/2004	Kali Ratcliffe Design Subject Lead Email: Kali.Ratcliffe@baj.ac.uk Telephone: 1120/2004
Marina Skia Tutor Marina.Skia@baj.ac.uk 1120/2004	Stephen Barnett CAD Subject Lead Stephen.barnett@baj.ac.uk 1120/2004
Maya Ferroni Teaching Assistant Email: Maya.Ferroni@baj.ac.uk Telephone: 1120/2004	Vicki Purnell Tutor Vicki.Purnell@baj.ac.uk 1120/2004
Eleni Zolia Theory Subject Lead Eleni.Zolia@baj.ac.uk Telephone: 1120/2004	Elisavet Messi Tutor Elisavet.Messi@baj.ac.uk 1120/2004
Charlotte Valkeniers Tutor Charlotte.Valkeniers@baj.ac.uk 1120/2004	Lily Henderson Tutor Lily.Henderson@baj.ac.uk 1120/2004

Workshops and Classrooms

Location 1 - Langdales

British Academy of Jewellery, Langdales, 5 St. Cross Street, Hatton Garden, London EC1N 8UA
Telephone: 020 7405 0197 ext 364

Fire safety point: On the **CORNER OF HATTON GARDEN AND ST. CROSS STREET**, outside **H.S. WALSH STORE**

Ground Floor	Lower Ground Floor
<ul style="list-style-type: none">• Customer Service	<ul style="list-style-type: none">• Blue Workshop
<ul style="list-style-type: none">• Toilet (Unisex)	<ul style="list-style-type: none">• White Workshop
<ul style="list-style-type: none">• Communal Area	<ul style="list-style-type: none">• Toilets (Unisex)
	<ul style="list-style-type: none">• Ladies and Gents Toilets

Location 2 – Morley House

British Academy of Jewellery, 26-30 Holborn Viaduct, Holborn, London EC1A 2AT

Telephone: 020 7405 0197 ext 380/ 381/ 382

Fire safety point: St Andrew’s Church Gardens

Mezzanine Level	
<ul style="list-style-type: none"> • Reception • Ladies toilets • Gents toilets • Lecture theatre • Technicians office • Polishing room • Purple workshop • Yellow workshop • Green workshop • Tutors office • Teaching and learning office • Classroom 	
Ground Floor	1st Floor
<ul style="list-style-type: none"> • Security Guard (Zack) • Gents toilet • Ladies toilet • Disabled toilet 	<ul style="list-style-type: none"> • Head of Academy Office • MIS • 2 Computer rooms • British Academy Of Jewellery classroom/Free 2 Learn meeting rooms • Gents toilets • Ladies toilets • Learner canteen • Staff room • Facility officer • Boardroom • Recruitment office • HR Office
2nd Floor	3rd Floor
<ul style="list-style-type: none"> • Out of Bounds 	<ul style="list-style-type: none"> • Out of Bounds
4th Floor	5th Floor
<ul style="list-style-type: none"> • Out of Bounds 	<ul style="list-style-type: none"> • Out of Bounds

Location 4 – Birmingham Academy

British Academy of Jewellery, The Assay Office, 1 Moreton Street, Birmingham, B1 3AX

Location 5 – Customer Service and Retail Training Sites

British Academy of Jewellery, Free2Learn, 265A Mare Street, London E8 3NS

Telephone: 020 8525 9430

Learner ID Card

Introduction

The following procedure relates to learner identity (ID) cards and provides clear guidelines for staff and learners on the conditions of use. The purpose of the ID card is a means of personal identification.

New learners are issued with an ID card at the beginning of their first time at the Academy. The ID card is valid for the entire duration of study within the Academy. Learners will need to go to the Reception area at St Cross Street to be issued with your photo ID.

ID card Conditions of Use

1. The learner ID card is the property of the Academy
2. All learners are required to present their ID card as proof of identity by staff whilst on the Academy's premises.
3. Learners should not allow anyone else to use their learner ID card or disciplinary procedures may be imposed.
4. All learners must be in possession of a valid ID card for the duration of their study, if a learner leaves the Academy the learner must return the card to Learner Services department.

Card Replacement

In the event that an ID card is lost or stolen it is the responsibility of the learner to notify Learner Services. Lost cards are frequently handed in to Learner Services and we will return this to the card holder. There will be an additional cost for card replacements of £5.00.

Learner Withdrawal

If a learner withdraws from their course, he/she must hand their ID card to the Admissions department.

Further information

If you have any other questions about your Learner ID Card please contact Admissions, E-mail: Admissions@baj.ac.uk or telephone 020 7405 0197.

Learner Representation and Feedback

British Academy of Jewellery is committed to providing an inspirational educational experience for its learners. As part of that experience the Academy believes that the active involvement of the learner in shaping the future of both the Academy and their own learning experience will have a significant and positive impact on the future development and success of the learners and the academy.

The learner voice is vital in enabling the Academy to make decisions that will lead to the most effective development of the teaching, learning and other services provided to the learner. The learner voice will continue to play a more prominent role in the processes and procedures at the Academy and the new quality improvement plan as of September 2017.

Making a difference

Feedback can bring about an immediate change, or it will trigger or support a change which takes longer to implement. Either way, we value all feedback. You have an integral role in the system for maintaining and improving the quality of the Academy's courses.

We hear you

British Academy of Jewellery listens very carefully to learner feedback and tries to respond to it in a way that will make a real difference to current and future learners.

Review Days

Our courses have scheduled review days where learners will have one to one meetings with their course tutor to review their individual progress, learning experience and set targets to enable them to progress through the course to meet the end date. It is very important to take ownership of the progress reviews days and to set challenging realistic targets.

Surveys

Please take time to complete all surveys as it provides valuable information for the Academy. The results of these are used as key performance indicators by the Academy to assess the quality of the courses that are offered.

The surveys will include:

- Learner Induction Survey
 - a) Six weeks from starting your course
- Teaching and Learning Survey
 - a) Twelve weeks from starting your course
 - b) Twenty-four weeks from starting your course
- Destination Survey
 - a) Thirty-four weeks from starting your course

Student Council Representative

One of the key ways in which feedback collected is through Class Representatives. Class Reps are elected by the learners course, and are the easiest way to raise issues or suggest improvements. One of the Course Rep's main roles is to attend learner council meetings, where they can make sure that ideas and feedback reach the people who can bring about change. Class Representatives are elected by learners registered on the course.

The Purpose of the Student Council

The Student Council is one of the most important and immediate forums, since it deals with matters directly related to the learners course experience. It provides a formal channel for learners to discuss the operation of the course with staff.

The Student Council is a forum where two class representatives nominated by their peers can represent the views of the class and help to improve the quality of the learners' learning experience.

All meetings start at 1.15pm – 2pm. The meetings are chaired by members of the Senior Management Team. The meetings may sometimes be chaired by other members of staff.

Meeting Agenda

1. Review last meeting minutes and actions
2. Group updates by class representatives
3. Learner enrichment and engagement activities
4. Equal opportunities
5. Health and safety issues
6. AOB
7. Confirm new actions

The meeting minutes are written and distributed to all learners and staff.

Class representatives are required to attend three meetings in the Academic year. In the case where one class representative is absent another is nominated to attend the meeting.

The class representative is key for the Admissions voice to be heard and the attitude and commitment of the person elected really matters. Support the Students Representatives, help them understand the balance of learner opinion. Be prepared to think about things in-depth so that views are informed and constructive. Not all problems can be solved, but informed input from learners can help to manage problems more effectively and improve the quality of all courses.

Student Oyster photo cards

If you are 16-18 you may be able to apply for a 16+ Zip Oyster Card which allows you to travel free on buses and trams across London, and half price tube fares.

If you are aged 18 or under, your parent or guardian must apply for you and you will need to provide:

- An active, valid email address
- Details from the applicant's machine readable passport. If you don't have one or can't provide the details you'll have to complete your application at a post office
- A payment card to pay the £20 administration fee. This must be registered to the address used in the application. If you don't have a card to pay online, you'll have to complete your application at a post office (see below)
- A digital photo (of the applicant.)

If you are 18 then you will need to apply for yourself and will need to:

- Create a Zip web account if you don't already have one
- Download and print a verification letter - you will need to get this endorsed by your school or college to confirm that you are still in full time education

Please click on the following link to apply for your 16 + zip card and start creating your account

<https://photocard.tfl.gov.uk/tfl/showLogon.do?selection=16plus#middle>

If you are over 19, you may apply for a Student Oyster, which will give you a 30% travel cards in London. Paper application forms are no longer available so you will need to apply on-line for the Oyster card. To register on-line for a student Oyster card you will need the following information:

You will need a passport photograph or any other picture you have (in which you are looking directly into the camera lens) that can be uploaded onto the Transport for London website.

You will need a debit or credit card to pay the £20.00 administration fee to Transport for London. Alternatively, if you use the Railway you can collect a Railway application form from us.

This form will need to be filled out in capital letters and also include a signature from a station officer and a member of staff at The British Academy of Jewellery. The Railcard administration fee is £30.00. You will also need the following information, to fill out the staff section:

Name: Leander Ward

Job title: Admission Manager

Work number: 0207 405 0197 ext 375

Please click on the following link to apply for the student Oyster card:

<http://www.tfl.gov.uk/fares-and-payments/adult-discounts-and-concessions/18-student?intcmp=1768>



16 - 25 Rail card

Learners who do not want to buy travel cards may still be able to save money if they hold a 16-25 Rail card (see below). You can get the discount loaded onto an oyster card to save 1/3 on off-peak, single pay as you go fares on London Underground and DLR services. Just call in to a London Underground ticket office.

Apply online for a [16-25 Railcard](#) to save one third on national rail fares. If you require a paper application form, you can collect it from your local train station or from the Admissions department. Full-time learners aged over 25 are also eligible, but will need to upload the [mature learner declaration](#) when making an online application. If you prefer, you can make an application in-person at a staffed National Rail Station ticket office.

Learner Living Costs and Discounts

Living costs' can include travel, bills, food, rent and utility bills - basically any expenditure that is not for course costs or tuition fees.

Discretionary Learner Support Fund (DLSF)

The purpose of DLSF is to support learners' studies at British Academy Of Jewellery and their progression. DLSF are used to assist learner's aged 16 and over who may have difficulties in completing their course because of financial hardship.

The Learner Support Fund is a Government Fund and subject to Government changes in funding streams. This means support is **not** guaranteed and these guidelines may be subject to change. This information is used to decide the level of award to be made to each eligible learner.

While each application is considered on the basis of individual circumstances, priority will be given to the following:

- Those in care or recently left care (LLDD up to age 25)
- Young parents and those who are considered to be at risk
- Those eligible for fee remission because they are themselves, or they are the dependant of someone else who is, receiving a means-tested state benefit or Tax credit;
- Adults undertaking a full first level 2 qualification
- Learners aged 19-23 undertaking a full first level 3 qualification;
- Learners with learning difficulties and/or disabilities
- Those recently made redundant
- Those learners supported through unemployed training programmes

To be eligible for financial assistance from the Discretionary Learner Support Fund you must:

- Be funded through a loan.
Be an enrolled learner on a course funded by Skills Funding Agency.
- Paid full amount or a deposit of tuition fee expenses (if applicable).
- Have been 'ordinarily resident' in the UK/EU for purposes other than education for the three years preceding start dates of course.
- Have a household income of less than £20,000 per annum

Please note: DLSF will be based on individual circumstances. Both level of income, extent of support and the number of dependants will affect the final award. Some applicants may not be eligible.

Learners **Not Eligible** for Discretionary Learner Support Fund

- Overseas learners (non UK and non EU/EEA)
- Learners with family/household gross income of over £20,000 per annum
- Apprenticeship Programmes
- Participants in the New Deal for Lone Parents scheme may not benefit from full payment of childcare support costs from this scheme
- Participants in all other New Deal options are not eligible for discretionary funding, as their funding needs are met under the New Deal
- Learners who are 19 years and older, studying a Level 3 or higher qualification **and not** paying their tuition fees via the Advanced Learner Loan

Applicants must provide evidence of household income and possible, living expenses and complete the 2018 -2019 DLSF application form, which is available upon request. If you would like help completing or understanding the application form, please speak to a member of the Admissions Team by calling 020 7405 0197 or emailing Admissions@baj.ac.uk.

If you have received financial assistance and leave before the completion of your course you may be required to repay all or part of the grant. If your progress, attendance or punctuality proves to be unsatisfactory, money may be withheld.

Applicants who are working or in receipt of benefits will be required to show proof of current payments. Any direct payment you receive from the DLSF may affect the amount of benefit you receive and it is your duty to disclose the amount to the department for Work and Pensions (DWP).

If you have any queries about payments into your account after your application is approved, please contact the Admissions office on 020 7405 0197 or email admissions@baj.ac.uk

Turn 2 Us

Turn2us helps people in financial need gain access to welfare benefits, charitable grants and other financial help – online, by phone and face to face through our partner organisations. For more information please visit: www.turn2us.org.uk

Telephone: 0808 802 2000 (9am - 8pm Monday - Friday)

Email: info@turn2us.org.uk

Fax: 01443 827616

Write to: Turn2us, Unit 9, Cefn Coed Parc, Nantgarw, Cardiff CF15 7QQ.

Money Advice Service

If you are unsure about taking out a loan and want to seek independent financial advice, you can contact The Money Advice Service. It is a free and independent financial advice service established by the government and will be able to provide you with help and advice.

Website: www.moneyadviceservice.org.uk

Professional Career Development Loan (PCDL)

A Professional and Career Development Loan can give you the support you need to change career as the Government pays the interest on the loan while you are on the course.

The Skills Funding Agency covers the interest on the loan for the duration of your course (and for a month after it is finished). After this, you will have to start repaying the loan, plus interest.

Important to note the following:

- You can only apply through Barclays and Co-operative bank
- The interest is paid while you study
- You may be able to borrow between £300 - £10,000
- Courses must only last up to two years
- You cannot have savings over £16,000
- You have to repay the loan even if you do not finish the course

Learners may be eligible for some useful discounts on travel and shopping while they study. Most of this information is relevant to all learners, but always check the detailed eligibility requirements on the relevant websites

British Academy of Jewellery ID Card

All learners can get up to 10% discount on tools and materials when you present your ID card at:

- Cookson Gold – Hatton Garden, London
- Bellore – Greville Street, London
- Holts Gems – Hatton Garden, London
- H.S. Walsh - Hatton Garden, London
- R. Stevenson – Clerkenwell Road, London

Please contact the Admissions Team to discuss our short course programme and to receive your discount.

Tax credits

If you already claim Working Tax Credit and Child Tax Credit and begin a full time course, some learner income is not taxable and should not change your tax credits. However, if you work full time and reduce your hours and earnings this could affect your assessment. You should call [HMRC](#) to get further advice.

Learners & Council Tax

Council Tax is a tax on the household and not the individuals within it. Your household may be exempt if all residents prove they are learners on full-time courses.

For Council Tax purposes a 'full-time course' has to be at least 21 hours a week, unless otherwise stated.

- If you are under 18 you are not liable for Council Tax.
- If you are age 18 or 19 and on an FE course that is more than 12 hours a week, you are not liable to pay Council Tax from the start date to the end date of your course.
- If you study full-time and live alone you will not be liable to pay any Council Tax from the start date of your course until the end date of your course.
- If you study full-time and live in a household with other people who are all full-time learners, the household will not be liable to pay any Council Tax.
- If you study full-time, but you live with an adult who is not a full-time learner, a bill will be issued. You should discuss your contribution with the person you live with. However, if you prove you are a full-time learner a 25% "single persons discount" should be applied to the bill.
- If you study full-time and live with more than one adult who is not a full-time learner a Council Tax bill will be issued to the household. There is no discount. You should discuss your contribution with the people you live with.
- If you study part-time you will not be exempt under the learner rules. However, you may be entitled to Council Tax Benefit/Council Tax Support if you have a low income.

To prove that you are a full-time learner, please collect a Learner Status Letter from the Admissions Team, after you have enrolled.

Support with learning in the classroom

British Academy of Jewellery staff are committed to support all learners. If you have a learning difficulty or disability, we encourage you to inform your tutor or the Pastoral Care Manager. We will then be able to have a discussion with you on support that can be in place to help you in the workshop and classroom.

If you are dyslexic or have other specific learning difficulties, you may be eligible for Disabled Learners' Allowances [DSA] to help you with extra study related costs. To apply you will need to supply evidence of your disability.

You will also need to provide a full diagnostic report written after you were 16 from:

- A chartered or practitioner psychologist
or
- A specialist teacher holding a current Assessment Practising Certificate

The report should use the format and tests recommended in the SpLDs Working Group's Guidelines.

To get a full diagnostic report you can contact one of the organisations below:

- The Health Professions Council [HPC] for psychologists [HPC website](#)
- The Professional Association of Teachers of Learners with specific learning difficulties: <http://www.patoss-dyslexia.org/SupportAdvice/DisabledLearnerAllowances/DSAINformationforLearners/>

For more information on how to apply for Disabled Learners' Allowance please visit: 0141 228 6070

Those listed who show they have an SpLD Assessment Practising Certificate will have the letters SpLD APC in their listing. If you want additional information or advice, you can email the Patoss office: patoss@sworcs.ac.uk.

- The Dyslexia Guild and the British Dyslexia Association also issue APCs.
- Dyslexia Action: guild@dyslexiaaction.org.uk
- British Dyslexia Association: info@bda-dyslexia.org.uk

You will need to pay for your diagnostic report. Once you receive your diagnostic report, please present a copy to the Pastoral Care Leader who will then liaise with the Teaching and Learning team to confirm what support can be provided within the Academy. You may be referred to an external organisation who will provide advice and support whilst you are studying with us.

General Health and Useful Support Contacts

It is important to register with a GP (General Practitioner). Do not wait until you are unwell to do this.

If you have an existing health condition you will need to register as soon as possible. All learners on a full time course lasting for more than six months are entitled to free National Health Service (NHS) treatment, although you may need to pay for prescriptions and dental treatment.

If you are having ongoing treatment or if you have a long term health condition you are advised to make contact with the Learner Services department before the start of your course. Advice can be given by email, phone or a face-to-face appointment.

Telephone: 0845 776 600

Website: www.nhsdirect.nhs.uk

Mental Health

If you have a mental health issue or are concerned about your health and well-being, we encourage you to make contact with the Learner Services department before your course starts. You can speak to the Head of Learner Services by making an appointment. You will be able to talk through your concerns and to find out about the support the Academy can offer. It is always useful to inform us if you have had treatment in the past and what has been helpful. If you would have difficulty attending an appointment ahead of starting your course, we can offer telephone advice.

Useful websites

- www.rethink.org
- www.mind.org.uk
- www.samaritans.org
- www.depressionalliance.org

If you want to find out more about a particular issue or if you want to get additional help and support, please contact any of the organisations below.

Subject	Organisation	Website
General	Citizens Advice Bureau Website gives basic information about many topics including equal rights and employment and training	www.citizensadvice.org.uk
	Directgov Information on a range of public services	www.direct.gov.uk
	HM Revenue and Customs Information on tax credits, working tax credits and child benefit	www.hmrc.gov.uk
	Equality and Human Rights An excellent source of information about your rights, including sections about education and resources for young people	www.equalityhumanrights.com
Bullying	Bullying UK Help and advice for victims of bullying	www.bullying.co.uk
	Childline 24 hours helpline for a child or young person needing help. Telephone: 0800 1111. Textphone: 0800 400 222	www.childline.org.uk
Disability	Skill: National Bureau for Learners with Disabilities	www.skill.org.uk
	Focus on Disability (Relationships/ personal/ sexual)	www.focusondisability.org.uk
	UKDPC The United Kingdom's Disabled People's Council	www.bcodp.org.uk
	Epilepsy Action	www.epilepsy.org.uk
	Disability Rights UK Offer practical advice and support for disabled learners	www.disabilityrightsuk.org
	Scope Offer advice, guidance and support to disabled people	www.scope.org.uk
	Royal National Institute for the Blind Support blind and partially sighted people	www.rnib.org.uk
	The National Autistic Society Information for learners with Autism	www.autism.org.uk
	Dyspraxia Foundation Information for learners with Dyspraxia	www.dyspraxiafoundation.org.uk
Gender	Women's Aid Federation and Rape Crisis Centres Offer practical help and support for women who have experienced violence, physical, emotional or sexual abuse	www.womensaid.org.uk
Homelessness	Shelter Free phone helpline for those facing a housing emergency. Telephone: 0808 800 4444	www.shelter.org.uk
Travel Costs	Transport for London Discounted travel for learners and apprentices	www.tfl.gov.uk
Children and Young People	The Children's Legal Centre Legal advice, information and representation for children and young people. Young person freephone: 0800 783 2187 Child Law Advice Line: 0845 1202948	www.childrenslegalcentre.com

	The National Youth Agency Information toolkit for young people.	www.youthinformation.com
	Youth Access The national membership organization for young people's information, advice, counselling and support services	www.youthaccess.org.uk
	The National Youth Advocacy Service The UK charity providing children's rights and socio – legal services. They offer information, advice, advocacy and legal representation to children and young people up to the age of 25	www.nyas.net
	NSPCC	www.nspcc.org.uk
Smoking	NHS Smoking Helpline Telephone: 0800 169 0169	www.giveupsmoking.co.uk
Alcohol Abuse	Drink Line Telephone: 0800 917 8282	www.drinkaware.gov.uk
Drugs	National Drugs Helpline Telephone: 0800 776 600	www.talktofrank.com
Debt	National Debt Line Telephone: 0808 808 4000	www.nationaldebtline.co.uk

Library Services

British Academy of Jewellery does have small library facilities located on the Mezzanine floor in Morley House. Books can be borrowed via the Technical Office. There is also a larger general Public Library within walking distance.

The Goldsmiths Library

Housed on the first floor of Goldsmiths' Hall, the Library was established in the 1950s as part of the Company's mission to promote jewellery and silversmithing.

Today its collections include over 8,000 books and 15,000 + images, magazines and journals, films, special research collections and subject files on a wide range of topics. The Library is also responsible for the Company's archives, which date back to the 14th century. We welcome all researchers, from learners and academics to professional gold and silversmiths and the general public.

Visiting the Library

If you would like to visit the Library, please telephone on 020 7606 7010 or email library@thegoldsmiths.co.uk to make an appointment. To help you get the most out of your visit, staff can discuss your research with you in advance and provide relevant material when you arrive. The Library is open between 10 am and 4.45 pm, Monday to Friday.

Website: www.thegoldsmiths.co.uk/library

Independent Careers Advice

If you are unsure whether the course you would like to take is right for you, then you can contact the National Careers Service Website: www.nationalcareersservice.direct.gov.uk

Telephone: 0800 100 900

Recommended Book, Websites, Blogs and Trade Shows List

Books

Jewellery Making Techniques

- The Jeweller's Directory of Shape and Form (Jewellery) by Elizabeth Olver
- The Art of Jewellery Design: From Idea to Reality (Jewellery) by Elizabeth Olver
- The Workbench Guide to Jewellery Techniques by Anastasia Young
- The Jewellery Materials Sourcebook by Anastasia Young
- Jewellery Making - A Complete Course For Beginners by Jinks McGrath
- At The Bench, An Illustrated Guide To Working With Gold And Silver by Gregg Todd And Greg Gilman
- The Platinum Bench by Jurgen Maerz
- Jewellery: makers, motifs, history, techniques by Diana Scarisbrick (London, Thames & Hudson, 1989)

Wax Modelling

- Jewellery Wax Modelling: A practical guide for the Jewellery Model Maker by Adolfo Mattiello

Stone Setting and Mounting

- Gemstone Settings by Anastasia Young
- Stone setting For Contemporary Jewellery Makers by Melissa Hunt
- Mounting And Setting Stones by Sonia Cheadle
- Channel Setting Diamonds by Robert R. Wooding Book

Hand Engraving

- Engraving On Precious Metals by A. Brittain & P. Morton Book
- English Engraves Silver 1150 – 1900 by Charles Chichele Oman (London, Faber & Faber, 1978)

Enamelling

- The Art Of Enameling by Linda Darty
- Enamelling On Precious Metals by Jeanne Werge-Hartley

Soldering

- The Art Of Soldering For Jewellery Makers: Techniques & Projects by Wing Mun Devenney

Beading

- Step By Step Bead Stringing by Ruth F. Paris
- The Beader's Bible: A Comprehensive Guide to Beading Techniques by Dorothy Wood
- Compendium of Beading Techniques by Jean Power
- All About Beads: Over 100 Jewellery Designs to Make and Wear by Barbara Case
- Creative Beading: Over 60 Original Jewellery Projects and Variations by Juju Vail
- Beading with Cabochons: Simple Techniques for Beautiful Jewellery by Jamie Cloud Aiken
- Beyond Beading Basics by Carole Rodgers

- Creating Crystal Jewelry with Swarovski: 65 Sparkling Designs with Crystal Beads and Stones by Laura McCabe
- Beading with Crystals: Beautiful Jewelry, Simple Techniques by Katherine Duncan Aimone
- Making Jewellery With Gemstone Beads by Barbara Case

Precious Metal Clay

- Introducing Precious Metal Clay by Mary Ann Devos
- Polymer Clay Beaded Jewellery- 35 Beautiful Designs by Isabelle Cheramy-Debray

Diamonds, Gemstones and Pearls

- Diamonds by Marijan Dundek
- Jewellery And Gems - The Buying Guide by Antoinette Matlins
- Gemstone Buying Guide by Renee Newman Book
- Jewellery From Natural Materials by Beth Legg
- Gemmologists Compendium by R. Webster
- The Jeweller's Directory Of Gemstones by Judith Crowe
- Philip's Guide to Gems, Stones and Crystals by Cally Oldershaw
- Rocks and Minerals (DK Handbooks) by Chris Pellant
- Gemstones: Understanding, Identifying, Buying by Keith Wallis
- Emerald: Twenty-one Centuries of Jewelled Opulence and Power by Joanna Hardy, Jonathan Self, Franca Sozzani and Hettie Judah
- Pearls by Beatrix Chadour-Sampson and Hubert Bari
- Brilliant effects: a cultural history of gem stones and Jewellery by Marcia Pointon (New Haven and London, Yale University Press, 2009)

Jewellery Business and Marketing

- Marketing & Selling Handmade Jewellery by Viki Lareau
- Photograph Your Own Art & Craft by Sussie Ahlburg
- Profiting By Design, A Jewellery Maker's Guide To Business Success by Marlene Richey
- The Handmade Marketplace: How to Sell Your Crafts Locally, Globally, and Online by Kari Chapin
- How to Make Money Using Etsy: A Guide to the Online Marketplace for Crafts and Handmade Products by Timothy Adam
- Blogging for Creatives: How designers, artists, crafters and writers can blog to make contacts, win business and build success by Robin Houghton
- Build A Business from Your Kitchen Table by Sophie Cornish and Holly Tucker
- Power of Making: The Importance of Being Skilled by Daniel Charny

Ancient to 21st Century Jewellery Design

- 21st-Century Jewellery Designers: An Inspired Style by Juliet Weir-de La Rochefoucauld
- Jewels by Jar (Metropolitan Museum of Art) by Adrian Sassoon
- 20th Century Jewelry & The Icons of Style by Stefano Papi
- High Jewelry and Precious Objects by Cartier: The Odyssey of a Style by François Chaille
- Dior Joaillerie: The Beauty and Craftsmanship of Dior Fine Jewelry by Michele Heuze
- London's Lost Jewels: The Cheapside Hoard by Hazel Forsyth
- Jewels from Imperial St. Petersburg by Ulla Tillander-Godenhielm
- 7000 Years of Jewellery by Hugh Tait and Carol Andrews
- Beyond El Dorado: Power and Gold in Ancient Colombia by Elisenda Vila Llonch

- Boucheron: The Secret Archives by Vincent Meylan
- Faberge and the Russian Master Goldsmiths by Gerard Hill and G.G. Smorodina
- The Art of Bulgari: La Dolce Vita and Beyond, 1950 - 1990 by Amanda Triossi and Martin Chapman Set in Style: The Jewelry of Van Cleef & Arpels by Sarah D. Coffin and Suzy Menkes
- Harry Winston by Andre Leon Talley
- GRAFF: The Most Fabulous Jewels in the World by Meredith Etherington-Smith
- The New Jewelers: Desirable | Collectable | Contemporary by Olivier Dupon
- Collect Contemporary Jewelry by Joanna Hardy and Malcolm Cossons
- Drawing Jewels For Fashion by Carol Woolton
- Alchemy: Contemporary Jewellery from Britain by Dana Andrew and Alison Moloney
- Fashion Jewellery: Catwalk and Couture by Maia Adams
- Jewellery from Recycled Materials (Jewellery Handbooks) by Jaimie MacDonald
- Non-precious Jewellery: Methods and Techniques (Design and Make) by Kathie Murphy
- International Arts and Crafts by Karen Livingstone and Linda Parry
- Tiaras by Geoffrey Munn
- Medieval Jewellery: In Europe 1100-1500 by Marian Campbell
- Bulgari Serpenti by Marion Fasel
- Twentieth-Century Jewellery by Barbara Carlidge (New York, Harry N. Abrams Inc. 1985)
- The New Jewelry Trends and Traditions by Peter Dormer and Ralph Turner (London, Thames and Hudson, 1985)
- Jewellery In Our Time, Art, Ornament and Obsession by Peter Dormer and Helen Drutt English (London, Thames and Hudson, 1995)
- Jewellery Moves by Amanda Game and Elizabeth Goring (Edinburgh, NMS Publishing, 1998)
- Twentieth Century British Jewellery 1900 – 1980 by Peter Hinks (London, Faber & Faber, 1983)
- Modern Jewellery by Graham Hughes (London, Studio Books, 1963)
- Modern Artists' Jewels: An Exhibition held in the Jewellery Gallery of the Victoria & Albert Museum 11 September to 1 November 1984 by Carol Hogben (London, V&A, 1984)
- Antique and 20th century jewellery by Vivienne Becker (London, NAG Press, 1980)
- Jewellery through 7000 years by British Museum (London, British Museum, 1976)
- Understanding Jewellery by David Bennett and Daniela Mascetti (Suffolk, Antique Collectors' Club Ltd, 1989)
- A History of Jewellery, 1100–1870 by Joan Evans (London, Faber and Faber, 1970)
- The Art of Jewellery in Scotland by Rosalind Marshall and George Dalgleish eds (Edinburgh, HMSO, 1991)
- Jewellery making in Birmingham 1750-1995 by Shena Mason (Chichester, Phillimore, 1998)
- British Rings 800-1914 by Charles Oman (London, B.T. Batsford, 1974)
- Jewellery from Antiquity to the Present by Clare Phillips (London, Thames & Hudson, 1996)
- Jewels and Jewellery by Clare Phillips (London, V&A, 2000)
- New Directions in Jewellery by Jivan Astfalack, Caroline Broadhead and Paul Derrez (London, Black Dog Publishing, 2005)
- Masters and Protégés. Contemporary British jewellery by Norman Cherry (Birmingham, Birmingham City University, 2008)
- Maker Wearer Viewer: Contemporary Narrative European Jewellery by Jack Cunningham (Glasgow, Glasgow School of Art, 2005)
- Adorn: New Jewellery by Amanda Mansell (London, Lawrence King Publishing Ltd, 2008)

- Jewellery in the age of Queen Victoria by Charlotte Gere and Judy Rudoe (London, British Museum, 2010)
- Silver by Philippa Glanville (London, V&A, 1996)
- Art in Silver and Gold by Gerald Taylor (London, Studio Vista Limited, 1964)
- Sotheby's Concise Encyclopaedia of Silver by Charles Truman (London, Conran Octopus, 1993)
- An Illustrated Dictionary of Jewellery by Anna Somers Cocks (London, V&A, 1980)
- Renaissance Jewellery by Yvonne Hackenbroch (London, Sotheby Parke Bernet Publications, 1979)
- Anglo-Saxon Jewellery by Ronald Jessup (London, Faber & Faber, 1950)
- The Jewellery of Roman Britain, Celtic and Classical traditions by Catherine Johns (London, UCL Press, 1996)
- Mediaeval European Jewellery by Ronald Lightbrown (London, V&A, 1992)
- English Victorian Jewellery by Ernle D.S. Bradford (London, Country Life Ltd, 1959)
- Victorian Jewellery Design by Charlotte Gere (London, William Kimber, 1972)
- Victorian Jewellery by Deirdre O'Day (London, Charles Letts Books Ltd, 1982)

Websites and Blogs

- The Professional Jeweller – www.professionaljeweller.com
- Jewellery Focus – www.jewelleryfocus.co.uk
- Make and Sell Jewellery – www.makeselljewellery.com
- Retail Jeweller – www.retail-jeweller.com
- CAD Jewellery Skills – www.cadjewelleryskills.com
- Anna Lou - <http://www.annalouoflondon.com/blog/>
- Adorn London - <http://www.adorn-london.com/contact-us/>
- International Jewellery London Blog - <http://www.jewellerylondon.com/blog/>
- Daisy Jewellery - <http://www.daisyjewellery.com/the-edit>
- Blink London - <http://www.blinklondon.com/contact-us/>
- Tink Jewellery - <http://tinkjewellery.wordpress.com/>
- Stephen Einhorn Blog - <http://www.stepheneinhorn.co.uk/stephen-einhorn-jewellery-designer.asp>
- Kate's Jewellery Making Blog - <http://www.howtojewellery.co.uk/>
- The Cut London – www.thecutlondon.com
- Zoe & Morgan – www.zoeandmorgan.com
- Kleshna Jewellery – www.kleshna.com
- Kiki McDonough – www.kiki.co.uk
- GEM-A-PORTER – www.Gem-A-Porter.com
- Sarah Ashcroft - <http://www.thatpommiegirl.com/>
- Lily Melrose - <http://www.llymlrs.com/>
- Lucy - <http://www.shinythoughts.net/>
- Monica - <http://www.helloomonica.com/>
- Lucie loves - <http://lucieloves.co.uk/>
- I want you to Know - <http://www.iwantyoutoknow.co.uk/>
- Lela London - <http://www.lalalondon.com/>
- Liberty London - <http://www.libertylondongirl.com/>
- Style East London - <http://styleeast.blogspot.co.uk/>
- Yvette Christine - <http://yvettechristine.com/>
- Style of a London Tall Girl - <http://styleofalondontallgirl.blogspot.co.uk/>

Magazines and Journals

Another Magazine	Metalsmith (Released by SNAG)
Arena Homme Plus	Numero
Blitz	Nylon
Candy	Professional Jeweller (also has an excellent e-mail newsletter)
Collezioni Donna	Purple Fashion
Collezioni Uomo	Retail Jeweller
Craft (Released by the Crafts Council)	Schmuck Magazine (German jewellery magazine)
Dazed and Confused	Self Service
Fantastic Man	So-En
Fashion Theory	Ten Magazine
Fine Silver Magazine	The Face
Harper's Bazaar	The Gentlewoman
I-D	The Goldsmith (Released by the NAG)
INSTORE (also has an excellent reference website)	The Jeweller
JCK	Uomo Vogue
Jewellery Focus	V Magazine
Jewelry Artist (formerly known as Lapidary Journal)	Vogue
JFW	Vogue Gioiello (Italian Vogue quarterly for jewellery)
L'Officiel	W Magazine
Lula	

Reference Websites and Online Newsletters

- National Careers Service <https://nationalcareersservice.direct.gov.uk/advice/planning/jobprofiles/Pages/jewellery-designer-maker.aspx>
- Get Into Jewellery – www.getintojewellery.co.uk (Case studies, testimonials, and expert help on how to change careers to get into the jewellery field)
- Ganoskin - www.Ganoksin.com (Knowledge base for all manner of things related to jewellery making)
- Benchpeg – www.benchpeg.com
- www.Klimt02.net – International Art Jewellery Online
- A-N - Artists Online Magazine and Network
- In Detail
- Fashion Insight
- Who's Who in Gold and Silver
- At the Bench – Online Tutorial Videos for Jewellery Making
- ArtQuest – Online Resources for Visual Artists and Craftspeople
- Retail Jeweller

Online Retail Communities

- Etsy – www.etsy.com
- Folksy - www.folksy.com
- Not On The High Street – www.notonthehighstreet.com
- Boticca – www.boticca.com
- Asos – www.asos.com

Professional Organisations

- Association of Contemporary Jewellers (ACJ)
- British Jewellers Association (BJA)
- National Association of Goldsmiths (NAG)
- Crafts Council
- Cockpit Arts
- Institute of Professional Goldsmiths (IPG)
- Company of Master Jewellers (CMJ)
- Houlden Group
- Worshipful Company of Goldsmiths

USA

- Manufacturing Jewellers and Silversmiths of America (MJSA)
- Gemological Institute of America (GIA)
- Society of North American Goldsmiths (SNAG)
- Guild of Metalsmiths

Trade Shows – UK

- Spring Fair International – Late January/Early February
- London Fashion Week – February and September
- Desire – March
- Collect – May
- London Jewellery Week – Early June
- New Designers – Late June/Early July
- Goldsmiths Fair – Late August/Early September
- IJL – First week of September
- Origin – Sept
- Brighton Made – November

Trade Shows – Worldwide

- Vicenza Oro (Italy) – January, March and September
- Tucson (USA)- Most of February
- Inorghenta (Germany) – February
- Schmuck (Munich, Germany) – October
- Baselworld (Switzerland) – March
- MJSA Expo New York (USA) – March
- JCK Las Vegas (USA) – Late May/Early June
- HKTDC (Hong Kong) – March
- Bijourcha (Paris, France) – January
- Premier Classe Paris (France) – Sept-Oct
- Kosmima Athens (Greece) – October

Museums – London UK

- The British Museum - *44 Great Russell St, London WC1B 3DG*
- V&A Museum - *Cromwell Rd, London SW7 2RL*
- National Gallery - *Trafalgar Square, London WC2N 5DN*
- Tate Modern - *Bankside, London SE1 9TG*
- Design Museum - *28 Butlers Wharf, Shad Thames, London SE1 2YD*
- Whitechapel Art Gallery - *77-82 Whitechapel High Street, London E1 7QX*
- Tate Britain – *Millbank, London SW1P 4RG*
- Tower of London - *Tower Hill, London EC3N 4AB*
- Kensington Palace - *Kensington Gardens, London W8 4PX*

Tools and Materials Suppliers

- H.S. Walsh
- Bellore
- Cookson Gold
- Euro Findings
- AE Ward
- Gloster Tools
- Vitrum Signum
- Marcia Lanyon
- Holts Gems
- R. Stevenson
- London Graphic Centre

Aim of the Policy

The aim of the policy is to promote and integrate equality and diversity into all areas of the Academy's ethos, policy and practice and to recognise and work to remove institutional barriers that prevent equal access for learners, staff and other key stakeholders. This policy has been designed to meet the requirements of the Equality Act 2010.

1. Introduction

The rich diversity of our learners, staff and alumni is core and vital to the Academy's distinctive and national reputation. We are proud of our diverse learner communities and we are committed to ensuring the Academy is an inclusive and supportive environment for everyone. We believe that equality and diversity is integral to our inclusive curriculum, our creative innovation, our national reputation and the richness of our Academy life. We are committed to addressing inequality and celebrating diversity in order to sustain an accessible and inclusive environment for all learners, staff, alumni, governors, visitors, community and commercial partners with whom we engage.

Our diversity informs our practice-led teaching and learning traditions, our innovation and our employment practices, producing inspired practitioners who are a dynamic, influential and leading force in the creative, jewellery manufacture, retail, administration and technology industries. Our commitment to staff is underpinned by the following values:

- 1.1. Proactively work together to understand how equality and diversity is both meaningful and relevant to the Academy on an individual, collective and institutional level.
- 1.2. Prohibiting unlawful discrimination, harassment or victimisation on grounds of age, caring responsibilities, disability, gender, nationality, race, religious belief (or no belief), sexual orientation socio-economic class or transgender and whether such an identity is actual or *perceived* or whether this is by *association* with persons from any of these equality strands.
- 1.3. Comply with the requirements of equality legislation and fulfil our statutory and regulatory duties. In specific circumstances where differential treatment may be required we will use lawful exception or exemption; apply genuine occupational requirements or positive intervention to address historical and persistent disadvantage or under-representation; apply an academic admission requirement, or provide objective justification that constitutes a proportionate means of achieving a legitimate aim.
- 1.4. Set and monitor targets to increase the presence of those traditionally under-represented, and in accordance with the provision made by equality legislation, develop interventions to address the imbalance.
- 1.5. Strive to employ a diverse workforce which reflects the local community and the learner population
- 1.6. Make clear our expectations and commitments to equality and diversity during the recruitment and selection process and again during induction
- 1.7. Encourage recruitment from groups currently under-represented in the company and promote equality of opportunity and diversity within both the workforce and client.
- 1.8. Assess Academy policies, strategies and functions for adverse impact upon staff and learners, with respect to all the equality strands.

- 1.9. Actively consult on, communicate and promote our Equality and Diversity Policy, ensuring accessibility for all learners, staff, employers, service users and partners and make reasonable adjustments for staff who become disabled
- 1.10. Use benchmarking to measure our performance and learn from best practice in the FE sector, equality and diversity field and from institutions and practitioners in the creative, jewellery manufacture, retail, administration and technology industries.
- 1.11. Provide ongoing continuous professional development in equality and diversity, to equip staff to recognise and embed diversity and to challenge any form of discrimination.

2. Commitment to learners

British Academy of Jewellery provides a learning experience, which is positive, fair and inclusive. The experience begins with the learners' initial contact with the Academy, and continues beyond the end of their programme of study. We aim to:

- 2.1. Encourage applications from a diverse range of potential learners, and where appropriate, undertaking initiatives to attract applications from under-represented groups. We will ensure the publicity, information and guidance we produce displays diverse images, is available in accessible formats and meets the needs of potential learners from diverse backgrounds.
- 2.2. Admit learners solely on meeting the entry criteria and their potential to benefit from the opportunity to study. Disabled applicants and those with learning difficulties are encouraged to discuss their particular requirements in order to identify and accommodate reasonable adjustments enabling them to participate fully as a learner at the Academy.
- 2.3. **Induct learners** and share the values, policies and procedures of the Academy. Ensure the learners know our expectations to equality and diversity and inform learners of the facilities and resources available to them.
- 2.4. Offer support services that provide ongoing information, advice and guidance to learners, employers and other stakeholders; and strive to provide an inclusive teaching and learning environment that is personalised to the individual and which takes account of individual need and cultural backgrounds.
- 2.5. Work towards embedding equality and diversity by regularly reviewing the design and content of the curriculum, timetabling, the teaching methods and materials used to embed equality and diversity.
- 2.6. Offer assessment methods that meet both the awarding body guidelines and the needs of the learners.
- 2.7. Ensuring that where work placements, traineeships and apprenticeships are offered, the arrangements are proportionate, transparent and provide learners with comparable opportunities and experiences as far as possible. Employers will be informed of their responsibilities through our Equality and Diversity Framework and we will incorporate measures to monitor progress to ensure that the learning opportunities provided are appropriate. Employment obstacles faced by all learners will receive particular attention.
- 2.8. Provide impartial advice, guidance and tutoring to support progression to further education, apprenticeships, employment, undergraduate and postgraduate study.

3. Roles and responsibilities

3.1 The governing body will

- Ensure that the college strategic plan has a commitment to equality and diversity
- Receive and respond to staff and to learner feedback
- Agree and monitor progress towards these

3.2 The senior management team will

- Take an active lead in implementing this policy
- Use equality and diversity data in self-assessment reports to narrow achievement gaps
- Agree and monitor equality targets

3.3 All staff will

- Attend regular training opportunities as and when required to develop their knowledge and understanding of equality and diversity; and how this implicates their job role and responsibilities

Appendix A

Types of Discrimination

Direct Discrimination

This occurs when someone is treated less favourably than another person because of a protected characteristic.

Associative Discrimination

This is direct discrimination against someone because they associate with another person who possesses a protected characteristic (for example, a mother of a disabled child).

Perceptive Discrimination

This is direct discrimination against an individual because others think they possess a particular protected characteristic. It applies even if the person does not actually possess that characteristic.

Indirect Discrimination

Indirect discrimination can occur when an employer has a condition, rule, policy or a practice in the company that applies to everyone but which particularly disadvantages people who share a protected characteristic. Indirect discrimination can be justified if employers can show they acted reasonably in managing their business.

Harassment

Harassment is “unwanted conduct related to a relevant protected characteristic, which has the purpose or effect of violating an individual’s dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that individual”. Employees will now be able to complain of behaviour that they find offensive even if it is not directed at them, and the complainant need not possess the relevant characteristic themselves. Employees are also protected from harassment because of perception and association.

Third Party Harassment

The Equality Act makes employers potentially liable for harassment of their employees by people (third parties) who are not employees of the company, such as customers or clients.

Employers

Will only be liable when harassment has occurred on at least two previous occasions and they were aware that it has taken place but did not take reasonable steps to prevent it from happening again.

Victimisation

Victimisation occurs when an employee is treated badly because they have made or supported a complaint or raised a grievance under the Equality Act; or because they are suspected of doing so. An employee is not protected from victimisation if they have maliciously made or supported an untrue complaint. There is no longer a need to compare treatment of a complainant with that of a person who has not made or supported a complaint under the Act.

Failure to make reasonable adjustments

The duty to make reasonable adjustments comprises three requirements for service providers and those exercising public functions. These requirements are:

Where a provision, criterion or practice puts disabled people at a substantial disadvantage compared with those who are not disabled, to take reasonable steps to avoid that disadvantage

The duty to make reasonable adjustments comprises three requirements for service providers and those exercising public functions. These requirements are:

Aim of Policy

This policy is in response to the quality agenda and requirements of the Common Inspection Framework (OFSTED); to improve retention and achievement by raising standards of attendance and punctuality across the Academy.

Learners are more likely to complete and achieve their qualification if they attend classes regularly. Students who arrive late have a negative impact on their learning and also on the progress of their colleagues. High expectations of attendance and punctuality are required by staff at the Academy and employers in the industry and therefore the Academy expects learners to achieve 100% attendance.

- The expectation is for 100% 'present' at all scheduled classes. Students should arrive promptly at least **ten minutes** prior to the start of the lesson
- Progress reviews held by the tutor and learner throughout the course will be used as part of the quality monitoring process.
- Student absences are followed up by the staff member teaching on the given day. Students will be expected to explain in person the reason for their absence and the authorisation will be limited to specific situations.
- Employers are contacted if an apprentice is absent
- There will be clear consequences for students whose attendance falls below 90%. Attendance monitoring is part of the Academy's Learning and Quality processes.

Learners are expected to:

- Attend all lessons on time and be ready to learn.
- Inform their tutor before the lesson, by an agreed contact route, if they are unable to attend.
- Obtain a letter from their parent or guardian [learners aged 18 or under] if illness lasts more than one week.
- Keep health and other appointments out of learning hours
- Not take on work commitments that clash with time at the Academy; any absence for work will be counted as unauthorised absence.
- Complete outstanding work from missed classes due to poor punctuality or attendance

If a learner is absent for four consecutive weeks, the Academy has the right to withdraw the learner.

Stage 1

Where a learner is absent and there are initial concerns over attendance and/or lateness, a learner is reminded of the Academy's Learner Charter and Code of Conduct. There should be no more than two verbal warnings before a written warning is issued.

Stage 2

Where a formal written warning letter has been issued and the absence and/or lateness continues; the learner will be required to attend a meeting with the Learner Support Coordinator. Following the meeting, in most cases the learner will receive a written statement outlining the consequences for further absence/lateness. This statement will also contain the length of time the attendance and/or lateness will be monitored. If the absence and/or lateness is repeated, further disciplinary action will follow.

- Attendance: Below 90% 'present'; or absent two or more sessions in a week or 5 or more absences in any 4 weeks period
- Lateness: late twice in a week or more than 5 times in any 4 weeks period or patterns of lateness
- Patterns of absence (e.g. Monday, functional skills lessons) or concerns about sickness occurring on a regular basis
- 3 unauthorised absences will result in any Learning Support Fund (LSF) issued by the Academy to be suspended and will be reviewed Head of Teaching and Learning.

Stage 3

Where a learner has breached the conditions of Stage 2, s/he will be required to attend a disciplinary hearing with the Head of Teaching and Learning. The Head of Teaching and Learning will appoint a representative to conduct an investigation into the serious misconduct.

- Attendance: Below 90%, persistent lateness or failure to improve since formal warning or absence review.
- If a secondary Disciplinary Hearing for poor attendance or punctuality is held, this can lead to withdrawal from the Academy.

Authorised Absence

An absence is authorised where:

- It is agreed in advance with a tutor

Authorised absences may include:

- Sickness supported by a medical certificate or doctor's letter
- Medical appointments
- Court appearances
- Appointments with government or voluntary organisations
- Funerals
- Religious holidays
- Driving Tests

Reasons for absence that are NOT acceptable:

- Holidays
- Part or full time work which is not part of the learner's programme of study
- Leisure activities
- Birthdays or similar celebrations
- Babysitting younger siblings
- Shopping
- Driving lessons

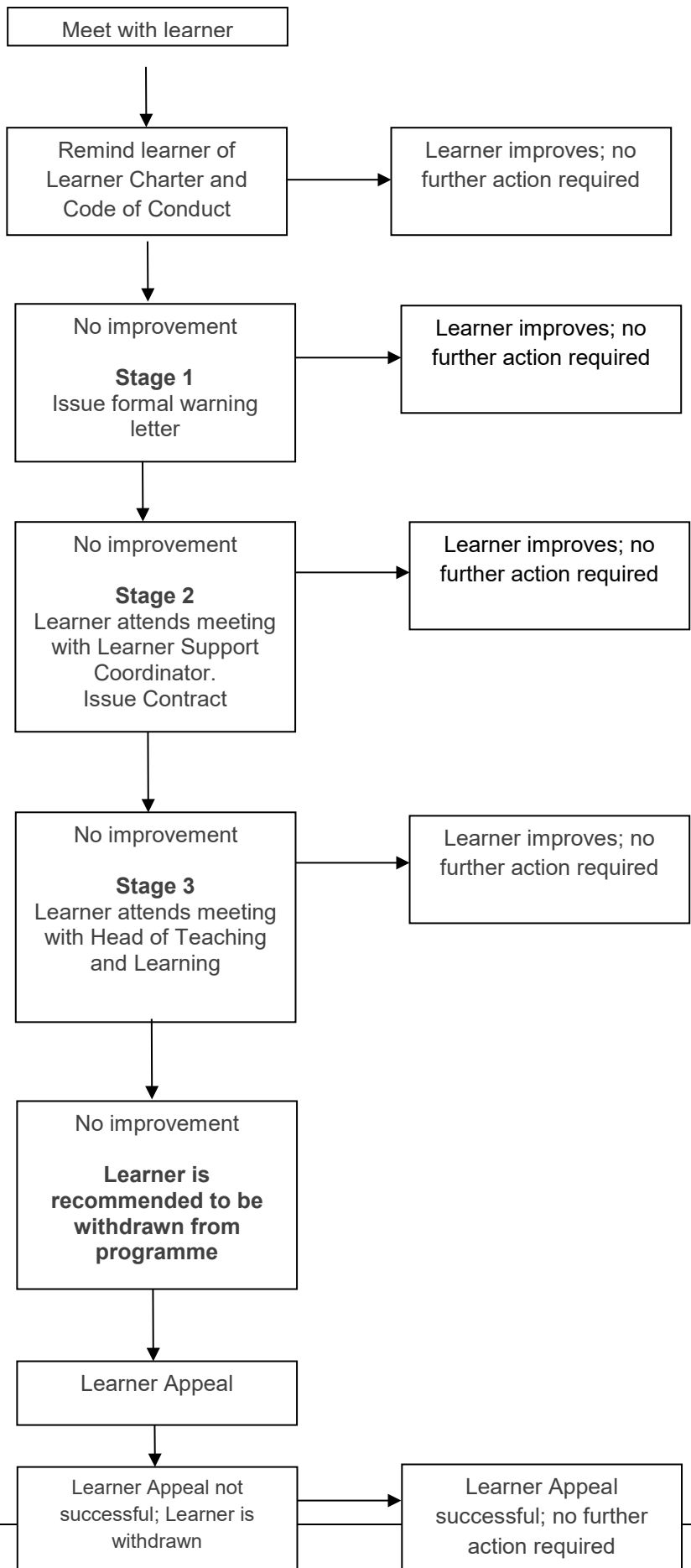
This list is not intended to be exhaustive.

Related policies

We also have the following related policies: Withdrawal/transfer/suspension/ exclusion and resumption of study policy and the learner Charter.

Implementation, monitoring and review of this policy

This policy will take effect from 1st September 2018. The Senior Management Team has overall responsibility for implementing and monitoring this policy, which will be reviewed on a regular basis following its implementation and may be changed from time to time.



Aim of the Policy

This policy refers to the circumstances where a learner may transfer and outlines the procedures and processes.

This document is applicable to all learners enrolled onto:

- a. An accredited qualification or programme of study
- b. A traineeship
- c. An apprenticeship
- d. A non-accredited course or programme of study e.g. short courses

This document is applicable to all teaching and non-teaching staff at the Academy. The Head of Quality is responsible for making sure the policy is updated and relevant to all learners studying at the Academy. The Academy ensures that the policy is transparent and consistently applied.

Introduction

A 'Transfer' is where a learner has transferred to a different programme or learning aim within the same provider within the same academic year.

- The Academy will consider transferring a learner in exceptional circumstances only. All requests must be made in writing and submitted to the Head of Quality.
- The review of the request should take no longer than five working days. Within that time period, the Head of Quality may contact the learner or relevant staff.
- The learner will be required to attend an exit meeting with the Head of Quality and parents/legal guardian [if the learner is under 18 years old].
- The outcome of the meeting will be communicated to the learner and all relevant people within five working days.
- The learner will pay, on request, any outstanding costs, and this payment cannot be transferred or used as payment for the new course, and will sign a new learner contract.

Transfer Appeals

- All appeals regarding the transfer process will be address individually. An appeal should be made in writing to the Head of Quality within three days of the decision. The Head of Quality will respond within ten working days of receiving the appeal. Any further appeal should be made in writing to the Head of Academy within three working days. The Head of Academy will respond within five working days.

Aim of the Policy

This policy provides detail on the procedures and processes involved when a learner is suspended from his or her course, traineeship, pre-apprenticeship or apprenticeship; and applies to all learners enrolled onto any type of programme at the Academy.

This policy must be read in conjunction with the Learner's Disciplinary Policy and related procedures.

A 'Suspension' is where a learner takes a temporary break in learning and can only be authorised by the Head of the relevant department.

Break in Learning

1. The Academy can authorise a **break in learning** where:

- The learner/apprentice requires time away from studies due to long-term documented illness
- The learner/apprentice has evidence of extenuating circumstances such as a bereavement
- The apprentice has lost his/her employment

The member of staff requesting a break in learning will complete and submit to the Head of Quality a 'Break in Learning Request Form', attaching evidence of last day of learning along with all other relevant evidence e.g. letters, emails, incident reports or communication from external organisations, call logs, meeting minutes etc. The break in learning will stipulate how long the break in learning will continue and will have a set date for review.

Suspension

2. The Academy can authorise a **suspension** where:

- The learner breaches the learner charter agreement and/or behaves in a way that constitutes misconduct or that brings the Academy into disrepute.

In these circumstances, staff will follow the learner disciplinary procedure.

Authorised maximum length of time that a learner can be suspended	
Course	Maximum suspension period
Level 2 and Level 3 Diploma Jewellery Manufacture	7 lessons
Level 4 Diploma Jewellery Manufacture	8 lessons
Apprenticeship	3 days of employment or lessons at the Academy

Health Related Reasons

- A learner, who has been placed on a break in learning for health related reasons, may only be permitted to return to his or her class on submission of a written confirmation letter from a registered doctor or medical practitioner. The letter must confirm that the learner is fit to return to their programme of learning.
- In the event that the break in learning requires a delay in the completion of the course an extenuating circumstances form will have to be completed and reviewed by the Head of Quality.
- The final decision for a learner to return will be taken by the Head of Quality.
- If the learner subsequently enrolls onto another course, he or she will pay the full fee for the course, including any increases. Money paid for previous courses cannot be transferred.
- If a learner is under 18 years of age, he or she must attend the review or exit meeting with a parent or legal guardian. If a learner is 18 years or older, he or she can choose somebody to attend the review meeting with them.

Aim of the Policy

This policy explains the meaning of a learner withdrawing and the policy also outlines the procedures and processes involved in this situation.

This document is applicable to all learners enrolled onto:

- a. An accredited qualification or programme of study
- b. A traineeship
- c. An apprenticeship
- d. A non-accredited course or programme of study e.g. short courses

Introduction

A 'Withdrawal' is:

The complete termination of a learner's registration in both the programme of study and all units associated with it.

1. Withdrawal

1.1 The Academy can withdraw a learner if:

- The outcome of the Attendance and Lateness Formal Hearing results in an approved withdrawal.
- The learner does not respond to communication from the Academy or fails to improve performance in regards to unauthorised absence or unauthorised lateness.
- The learner breaches the learner charter agreement.
- The learner acts in any way that puts the Academy into disrepute or places other learners or staff in danger.
- The learner acts in any way that puts the company they are working in as part of their programme of study e.g. apprenticeship or traineeship, into disrepute or places other learners or staff in danger.
- The learner does not respond to communication requesting attendance to the Learner Withdrawal Exit meeting.
- The learner has an illness that will require external treatment that will result in the learner missing more than 10% of the course, apprenticeship or traineeship.
- The learner has to leave because of a personal issue that will result in the learner missing more than 10% of the course, apprenticeship or traineeship.
- It is discovered that the learner provided false information on their application form or false documents during the admissions process.

1.2 The member of staff must submit a Withdrawal Request Form to the Head of Quality; along with evidence of the learners last day of learning and all other relevant evidence e.g. letters, emails, incident reports or communication from external organisations, call logs, meeting minutes etc. No application will be considered without the supporting documentation

1.3 The learner will attend an exit interview exit meeting with the Head of Teaching and Learning and parents/legal guardian [if the learner is less than 18 years old].

1.4 The outcome of the meeting will be communicated to the learner and all relevant people within five working days.

1.5 The learner will pay, on request, all outstanding fees for the current course.

Withdrawal or Exit meetings conducted with a learner

If a learner is under 18 years of age, he or she must attend the review or exit meeting with a parent or legal guardian. If a learner is 18 years or older, he or she can choose somebody to attend with the review meeting with them.

Suspension Appeals

All appeals regarding the transfer process will be address individually. An appeal should be made in writing to the Head of Quality within three days of the decision. The Head of Quality will respond within ten working days of receiving the appeal. Any further appeal should be made in writing to the Head of Academy within three working days. The Head of Academy will respond within five working days.

Withdrawal process guide for tutor's and assessors

Prior to commencing the withdrawal of a learner from a course, the Tutor/Assessor should discuss with the learner and consult with the employer, if necessary, to establish the reasons for withdrawal. The learner may be able to temporarily suspend learning under the Learner Suspension Policy.

After all discussions have been exhausted and the only option left is withdrawal, the Tutor/Assessor will follow the process Annex A.

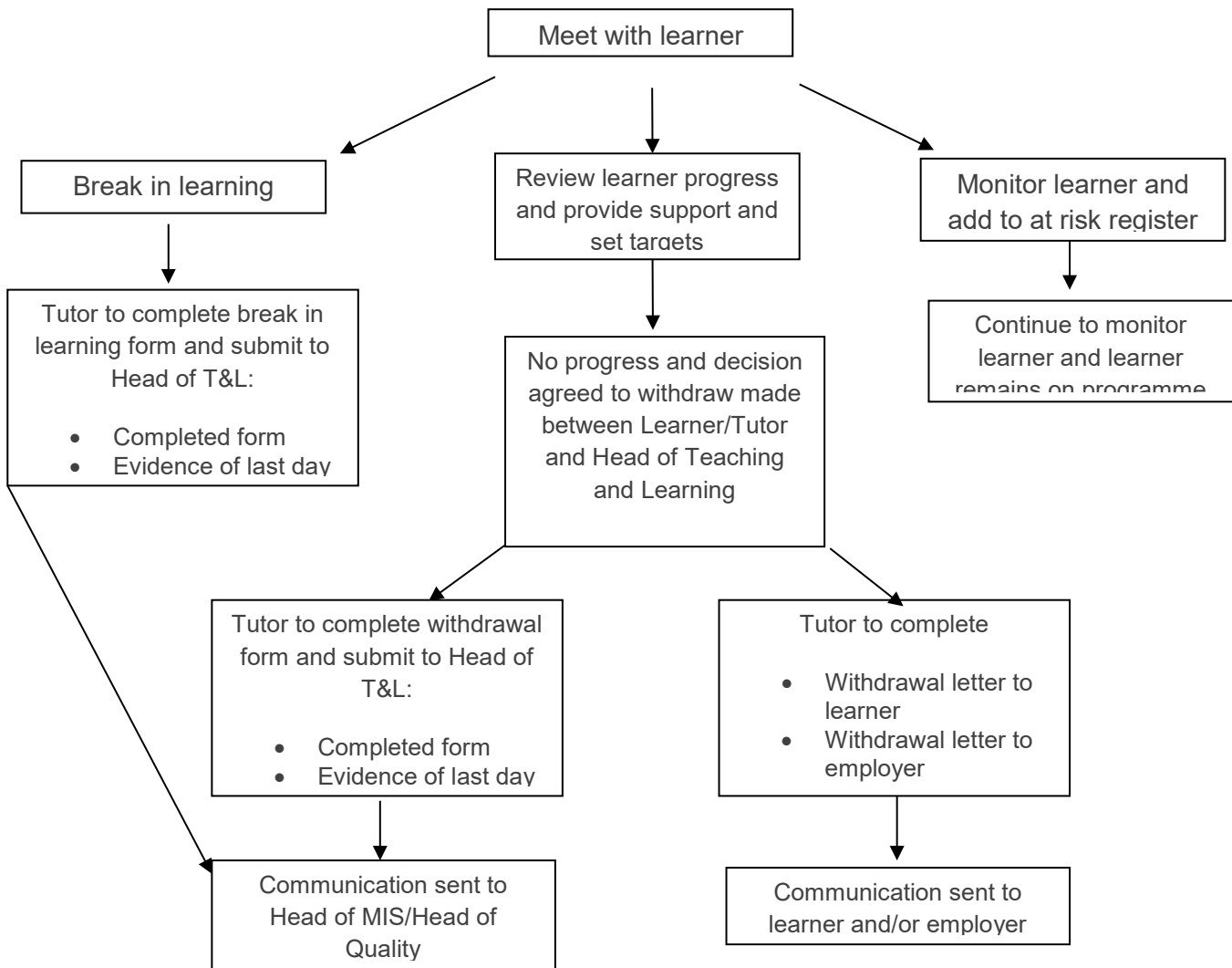
Withdrawal due to securing alternative Employment

If a learner withdraws early from a course due to securing alternative employment, a professional discussion should take place between the Tutor/Assessor, learner and new employer to ascertain whether re-engagement with the new employer is possible.

We improve retention by:

- Giving appropriate information, advice and guidance to every prospective learner prior to and throughout their learner journey
- Maintaining accurate register of attendance and punctuality
- Monitoring progress through regular reviews and contact with the employer where necessary
- Following up all absences the same day
- Analysing destination and all other available data

Annex A



Policy Statement

Malpractice consists of those acts which undermine the integrity and validity of assessment, the certification of qualifications and/or damage the authority of those responsible for conducting the assessment and certification. This refers to acts and omissions made by staff or learners involved with the assessment process.

Scope

This policy and procedure relates to Academy staff malpractice and applies to all internal assessments, and internal and external examinations. Where awarding bodies have their own published procedures these will take precedent over the Academy policy.

Legislation

The Human Rights Act 1998 applies to the operation of this policy.

Responsibilities

- All staff have a responsibility to give full and active support for the policy by ensuring the policy is known understood and implemented.

Actions to Implement and Develop Policy

- Line Managers should, at the appropriate time, introduce new members of staff to this policy.
- We use robust internal moderation/verification procedures.
- Customer Service and Recruitment Team and tutors should use the induction period, or other appropriate time, to introduce learners to this policy.

Definitions and Examples

- Academy staff malpractice: Any deliberate action by a member of staff that has the potential to undermine the integrity of the assessment process.

The following are examples of malpractice by Academy staff; this list is not exhaustive and other examples of malpractice may be considered by the Academy at its discretion.

- Improper assistance to candidates.
- Inventing or changing marks for internally assessed work (course work or portfolio evidence) where there is insufficient evidence of the candidates' achievement to justify the marks given or assessment decisions made.
- Fraudulent submissions that could lead to false claims for certificates.
- Inappropriate retention of certificates.

- Producing falsified witness statements, for example for evidence the learner has not generated.
- Allowing evidence, which is known by the staff member not to be the learner's own, to be included in a learner's assignment/task/portfolio/coursework?
- Facilitating and allowing impersonation.
- Misusing the conditions for special learner requirements, for example where learners are permitted support, such as amanuensis, this is permissible up to the point where the support has the potential to influence the outcome of the assessment.
- Failing to keep assessment/examination/test papers secure prior to the assessment/examination test.
- Falsifying records/certificates, for example by alteration, substitution, or by fraud.
- Learner malpractice: Any action by the learner that has the potential to undermine the integrity and validity of the assessment of the learner's work.

The following are examples of malpractice by learners; this list is not exhaustive and other instances of malpractice may be considered by the Academy at its discretion:

- Plagiarism of any nature in which case reference should be made to the Plagiarism Policy
- Collusion by working collaboratively with other learners to produce work that is submitted as individual learner work.
- Copying (including the use of ICT to aid copying).
- Deliberate destruction of another's work.
- Fabrication of results or evidence.
- False declaration of authenticity in relation to the contents of a portfolio or coursework
- Impersonation by pretending to be someone else in order to produce the work for another or arranging for another to take one's place in an assessment/examination.

Procedures used to deal with the above

- Where the Academy discovers or suspects an individual, or individuals, of malpractice it will conduct an investigation in a form commensurate with the nature of the malpractice allegation.
- Such an investigation will be initially undertaken by the Head of Quality who will interview all personnel linked to the allegation.
- The Academy will make the individual(s) aware (preferably in writing) at the earliest opportunity of the nature of the alleged malpractice and of possible consequences should malpractice be proven.

- The investigation will proceed through the following stages:
- Preliminary investigation, conducted by the Head of Quality or her representative, into the allegation to determine whether a full investigation is necessary. If the allegation appears to have substance, then all assessments by this member of staff should be halted until the investigation is complete
- Should it be determined that a full investigation is necessary it shall be conducted by an independent Investigation Officer appointed by the Head of Business Development and Production.
- During the investigation the Academy will give the individual the opportunity to respond to the allegations made.
- All stages of the investigation shall be documented by the person leading the investigation.
- The individual will be informed of the avenues for appealing against any judgments made.
- The Investigation Officer shall produce a report of their findings for the attention of the Head of Business Development and Production.
- For cases of staff malpractice, the Head of Business Development and Production.
- will decide whether to invoke the Staff Disciplinary Procedure.
- For cases of learner assessment malpractice, reference should be made by the Investigation Officer to any other relevant policies.
- Where the Investigating Officer report indicates that the learner assessment is suspect or flawed, then the Head of Business Development and Production will consider the appropriate penalties.

Monitoring and Evaluation

- Internal monitoring/verification of assessment activity will include malpractice checks.
- Evidence of both assessment and internal verification/moderation must be available for auditing.

Related Policies/Procedures

- Assessment Policy
- Plagiarism Policy
- Internal Verification Policy

Assessment Appeals Procedure

This document explains that procedure you need to follow if you do not agree with an assessment decision on your work and wish to appeal against it.

Stage 1

If you disagree with an assessment, you should first examine carefully the standards or criteria upon which the assessment was based.

If you then still feel that the assessment decision is wrong or unfair, you should discuss your reasons with the assessor concerned immediately. The assessor will consider your reasons and look again at what you did for the assessment. You will be given a clear explanation in writing within 5 working days. This will either be a new decision or confirmation of the original decision. If you agree with this explanation, the appeal stops at this point.

If you still feel the decision is wrong, you must tell the assessor. Your appeal will then proceed to Stage 2.

Stage 2

Within three working days of the end of Stage 1 you need to lodge an appeal in writing with the internal verifier. Your tutor will be able to give you details of who to contact. Your appeal should give details as to why you feel the assessment decision is wrong or unfair. You should also set out how you have tried to resolve the issue with the assessor.

Your appeal will be recorded and the internal verifier will examine the information supplied by both you and the assessor and reconsider the assessment decision. The internal verifier will contact you within 5 working days to give you the reconsidered assessment decision. If you agree with the reconsidered assessment decision, the appeal stops at this point.

If you are still unhappy with this decision, you have the right to go to an appeals panel and your appeal will proceed to Stage 3.

Stage 3

Candidates have the right to forward their appeal onto the Head of Academy Sofie Boons via sofie.boons@baj.ac.uk. Formal appeals have to be submitted in writing within three working days from receiving the reconsidered assessment decision from the internal verifier. We will acknowledge receipt of your appeal and provide a formal written response after an investigation within five working days.

If the matter is still unresolved the appeal must proceed to stage 4.

Stage 4

If you have gone through all the stages of BAJ's internal assessment appeals procedure and remain dissatisfied with the outcome or the way in which we handled your appeal you can:

- appeal to the awarding body
- appeal to SQA Accreditation/City and Guilds Accreditation, Ofqual or Qualifications Wales (as appropriate) if you feel that the centre and/or the awarding body has not dealt with your appeal appropriately

SQA Accreditation, City and Guilds Accreditation, Ofqual or Qualifications Wales (as appropriate) cannot overturn assessment decisions or academic judgements but may investigate the effectiveness of the centre and/or SQA's appeals process and require corrective action.

British Academy Of Jewellery Candidate Appeals Form	
Stage 2 Internal Verifier	
Candidate Name:	Assessor Name:
Date of Appeal:	
Nature of Appeal:	
Appeal Decision:	
Is the appeal resolved to the satisfaction of the candidate?	
Yes	No
If no, this appeal must be reviewed by the EQA	
Candidate Signature:	IQA Signature:
Stage 3 Appeal Panel	
Panel Members:	
Date of Review:	
Outcome of Review:	
Candidate Signature:	Date:
Stage 4 EQA	
Date of Appeal:	
Documents submitted	
Final Decision	
Candidate Signature:	Date:

Aim of Policy

To minimise the number of accidents and work-related illnesses to the lowest level practicable.

Management of health and safety is an integral part of our business and is given the highest priority and compliance with health and safety legislation is regarded as the minimum standard to be adhered to.

This policy is non-contractual. The guidelines required to meet our objectives and for the implementation of this policy are detailed within our Health and Safety Manual which will be kept at Morley House.

We accept our responsibility for providing a clean and safe environment in which all staff and learners can work. It is our duty to take whatever reasonable measures are necessary for accident and fire prevention and to protect the health, safety and welfare of our employees, learners and visitors to our premises.

This policy requires the full co-operation and understanding of all staff, learners and visitors to our premises. All work must be carried out in a safe manner and staff and learners have responsibilities under the Health and Safety at Work Act 1974. Any potential risk must be reported (such as faulty equipment or process) to the appropriate person, and all health and safety instructions must be followed.

Any neglect of health and safety requirements will be regarded as a serious disciplinary matter. Where an action or neglect is so dangerous as to constitute gross misconduct, the staff member or learner concerned will be liable to disciplinary procedures and even prosecution.

We provide personal protective equipment if required and ensure our staff and learners are given whatever training is necessary to understand the equipment they work with and to make them aware of any potential hazard and risks.

Information is provided to staff and learners about particular hazards or dangerous substances related to their jobs. Safety notices throughout the workplace are clear and prominent.

Organization and responsibilities

The management team will:

- Devise any amendments to the Academy Health & Safety Policy as may be necessary, and enforce the requirements of this policy
- Allocate employees, funds and materials within the approved Academy budget to meet the needs of the health and safety requirements of the Academy.
- Appoint an employee to be responsible for establishing and maintaining effective policies and risk assessments for health and safety within the Academy
- Implement safe plant, equipment and systems of work
- Implement safe arrangements for the use, handling, storage and transportation of articles and substances
- Make available sufficient information, instruction, training and supervision as are necessary to ensure the health and safety at work of all staff and learners
- Assess the risks that its activities present, to avoid or eliminate them, and if that is not possible to minimise and control them with the provision of the necessary resources
- Take responsibility of any place of work under the employers control in a condition that is safe and without risk to health including means of access and egress.

- Ensure there are adequate health and welfare facilities

One staff member will be nominated as the Health and Safety Representative and will be responsible for:

- Communicating to the Management Team any complaints by any member of staff or learner he/she represents relating to that employee or learner's health, safety or welfare at work.
- To promote health and safety in the workplace.

Hazard Reporting

Any suspected hazard will be reported to the Technician, who will notify the Health and Safety Representative if further action is required. Any employee whose work involves a hazard is authorized to cease the activity concerned until the hazard has been reported and if required the Group Head of Security, Property & Facilities confirms or rejects the action taken.

Accidents

It is the policy of the Academy to take all reasonably practicable steps to avoid accidents occurring. In the event of an accident, the first concern will be the care of the person or persons who have suffered injury. The accident will be reported to the persons detailed on the incident report form. The reporter shall ensure that adequate arrangements are made for the care of any injured persons. It is our policy to investigate all accidents, including those not involving injury, and arrangements for the investigation is made by the Technician who reports the result of the investigation to the Health and Safety Representative.

Safety Rules/Codes of Practice

Safety rules are essential to ensure the health and safety of staff and learners who work in the areas to which they relate. This applies particularly to the workshops, kitchens and fire precautions. Such rules as are considered necessary are drawn up in consultation with representatives of the employees and are attached to this document as codes of practice.

Hazard Identification

All activities, processes, substances and work places must be risk assessed under the direction of the Health and Safety Representative.

COSHH Assessment

Attention is brought to the Academy-wide COSHH Assessment. Steps must be taken to conform to these Assessments. The central COSHH Assessment register is held by the Technician. All activities involved with substances must be risk assessed.

House-keeping

The Academy attaches importance to the need for good house-keeping practices. It is policy to ensure that floors are kept free of anything that may cause slipping or tripping and that no waste materials, which could cause injury if trodden on, are allowed to remain where they fall. Items stored on shelves are stored in such a way as to ensure that they do not cause injury to anyone working in the vicinity or to anyone passing by. Rubbish is not to be allowed to accumulate in any working area and passageways are kept clear at all times.

Special Hazards

Portable electric mains operated equipment will be used only where this does not entail trailing power leads across walkways. Inflammable liquids are not permitted in any room in the Academy

in quantities that are in excess of that required to meet immediate needs and no radiant heat source will be used in any circumstances in which such use could incur a risk of fire or explosion.

Maintenance and Inspection of Machinery

It is the policy of the Academy to ensure that all equipment and machinery used by the Academy is maintained in accordance with the instructions issued by the manufacturer. Where manufacturers' instructions are not available, the Group Head of Security, Property & Facilities will seek advice to obtain such advice as may be needed for preparing those instructions. No maintenance will be carried out on any equipment or machinery while it is in use and it is the responsibility of the operator to ensure that all power operated equipment is isolated from its source before maintenance work begins and that power is not restored until after the person who carries out the maintenance gives formal notification that the maintenance work has been completed. Appropriate records will be kept by the Technician.

Joint consultation

It is Academy Policy to ensure that there is full consultation with representatives of the staff on all matters concerning health and safety at work. It is Academy policy to encourage every staff member to seek to identify hazards within the work situation and to bring any hazards that are identified to the notice of the Technician without delay.

Tutors

The tutors will be the focal point for day to day references on safety, and give advice or indicate sources of advice. They will act as a source for the retention and dissemination of safety information.

The following are expressly forbidden and are offences against the law:

- any interference with the fire alarm installation or fire-fighting equipment
- any alteration or interference with the electrical wiring, oxygen manifold or gas piping of the Academy buildings without permission of the Principal.

Group Head of Security, Property & Facilities

The Group Head of Security, Property & Facilities is responsible for the following:

- **Safety Inspection**

This will be achieved by inspections of the working environment carried out regularly by the appropriate staff members responsible for programme delivery and coordination. A record of each inspection will be kept and remedial action taken.

- **Personal Protective Equipment**

The wearing of Personal Protective Clothing is mandatory for all employees, learners and visitors where the risk assessment has advised this to be the course of action in order to reduce the risk of harm. Clear guidelines will be given by members of staff to learners at the beginning and continually throughout their course. A Personal Protective Clothing Register will be maintained by the Technician.

- **Fire Notices**

These notices are displayed in all classrooms, offices and on notice boards throughout the Academy. All learners have their attention drawn to the fire notices during induction week. Fire drills take place at regular intervals. All new members of staff and learners are informed of what to do in the case of fire by their tutor or the Technician. All employees are inducted on how to use the

fire equipment in their work area and must ensure that learners know the fire procedures. It is the policy of the Academy that learner student should operate or use of firefighting equipment, but should evacuate the building.

- **First Aid**

Rooms containing first aid boxes have the white cross on a green background sign. A sign is displayed of all those holding recognised First Aid Certificates. First aid can be administered only by those with appropriate qualifications.

- **New Hazards**

Any new products, equipment or premises are risk assessed by the Technician and the risk assessment implemented before the products, equipment or premises are used.

All staff members and learners

All staff members and learners have a responsibility to do everything they can to prevent injury to themselves, their colleagues and others affected by their actions or omissions at work. They are required to:

- Take reasonable care for their own health and safety and that of others
- Co-operate with the Academy so far as is reasonably practicable to enable the Academy to carry out its own responsibilities
- Not interfere with or misuse equipment, materials or facilities provided in the interest of health, safety or welfare in pursuance of any legal obligations
- Co-operate in keeping a tidy and safe working environment
- Observe and follow Academy health & safety regulations
- Be appropriately dressed for the activity undertaken
- Ensure that they take the necessary safety precautions in the use of all equipment, premises and materials
- Report any accidents immediately to the Lecturer in charge of their class or to the technician

Tutors, trainers and assessors

Tutors, trainers and assessors are responsible through the technician for:

- Ensuring that the work of the Academy is carried out in accordance with the Health & Safety Policy and its Codes of Practice
- The safety of learners whilst they are in their charge, whether in or outside the Academy
- Ensuring that clear safety instructions and warnings are given
- Personally following safe working procedures and observing general safety regulations
- Ensuring that the Management of Health and Safety at Work Regulations are adhered to
- Reporting accidents immediately using the accident report form and completing additional necessary and appropriate accident forms if required
- Ensuring that, in the event of a serious accident, nothing is disturbed at the scene of the accident, except as might be necessary for the removal of a casualty
- Initiating first aid as appropriate within the guidance of this policy
- Ensuring all fire doors are kept closed and are clear

Technicians, Ancillary, Administrative, and all other employees not specifically identified in this policy statement are responsible for

- Ensuring that the work of the Academy is carried out in accordance with the Health & Safety Policy and its Codes of Practice
- Personally following safe working procedures and observing Academy and other safety regulations

- Ensuring that they take the necessary safety precautions in the use of all equipment, premises and materials
- Recording accidents immediately in the Accident Book and completing the necessary and appropriate accident forms
- Ensuring that in the event of a serious accident nothing is disturbed at the scene of the accident, except as might be necessary for the removal of a casualty.
- Reporting defects to an immediate supervisor.
- Ensuring all fire doors are kept closed and are clear

Authority to stop work

Management have the authority to stop dangerous or illegal practices and if necessary, to require workers to stop work.

Consultation

The Academy will consult with staff members by informing them of any changes to working practices, amendments to our safety procedures or changes in legislation. In addition, all staff members are encouraged to raise any issues regarding health and safety with their manager or with the Health and Safety Representative.

Safety information

The Health and Safety at Work poster is displayed in the lobby and refreshment areas in all properties.

All staff members are provided with a copy of our health and safety policy and rules when joining the Academy.

Copies of our risk assessments and COSHH assessment are kept by Technician and are supplied to staff members as appropriate to their jobs.

The fire regulations and evacuation procedures are displayed throughout the Academy. All workers are instructed to read these carefully, and to know what to do in the event of a fire.

Workers are requested to inform the Health and Safety Representative or where appropriate the Technician if any replacement first aid items are needed. Our first aiders are trained to Level 3 and must be contacted in the event that a member of staff or learner requires first aid treatment.

Accidents to members of staff and learners

If the accident is relatively minor and the casualty is moveable, the person in charge should arrange for the first aid person to attend.

If the injury is more serious:

- (a) Assess nature of injury and treat injury if appropriate, either
 - (i) Arrange for casualty to be conveyed to hospital, or
 - (ii) Call an ambulance
- (b) If an accident happens stop the class, stay with the injured person, and send another student to office. The office team will call the emergency service.

First aid boxes are available in all appropriate rooms

First Aiders signs will be in place throughout the Academy and amended as necessary.

First aid should only be administered by a qualified first aider.

All accidents must be reported to the Health and Safety Representative and Technician as soon as possible with information of action taken and treatment given. A member of the senior management team will notify the parents / next of kin if necessary.

It is the responsibility of the person in charge when an accident occurs to fill in the Accident Report Book and other required forms as soon as possible after the accident.

Hazards and hazard reporting

Particular hazards relevant to The Academy:

- (a) Children will not be permitted to enter the Academy workshops
- (b) Chemicals will be stored in accordance with relevant legislation and risk assessment requirements.
- (c) Protective clothing will be similarly stored
- (d) Bottled gas/oxygen will be stored in accordance with relevant legislation and risk assessment requirements.
- (e) Noxious /poisonous / corrosive materials stored on the premises are kept in accordance with relevant legislation and risk assessment requirements.
- (f) Permanent signs are displayed in all relevant areas to notify of potential hazards

Hazard reporting

Any suspected hazard is reported to the Technician, who notifies the Health and Safety Representative if further action is required. Any employee whose work involves a hazard is authorized to cease the activity concerned until the hazard has been reported and if required the Group Head of Security, Property & Facilities confirms or rejects the action taken. Any damaged or defective equipment is reported to the Technician immediately.

Health and safety rules

A copy of the general health and safety rules is given to each new staff member when joining the Academy. All staff members are required to read and follow all policies, procedures and codes of conduct.

Student Workshop specific information

All learners must:

- Wear appropriate footwear with closed toes for the workshop, avoid sandals or fashion shoes
- Keep hair tied back and secure any jewellery or loose clothing
- Wear appropriate clothing for the workshop with an apron – Do not wear loose clothing, dresses, skirts or short shorts in the workshop. All clothing must not cause any potential hazards in relation to operation of machinery or naked flames
- Wear appropriate PPE i.e. apron, goggles, heat resistant gloves and dust mask
- Safe working procedures are displayed next to the machinery and must be displayed at all times. Do not use any machinery until you have been trained and instructed to do so
- Mobile phones cannot be used at the bench
- No food allowed in the workshop and drinks must be covered
- Clean up your workspace before leaving by putting all tools away after use
- Handle all chemicals with care and under supervision of the tutor
- Know where the stop buttons are for electrical machinery and gas flow.
- Never walk away or leave a machine while it is still in motion
- Know where the firefighting equipment is located
- Know where the FIRST AID BOX is located

- Report ALL accidents to the tutor
- Sign in and out when required

If you are unsure of any aspect of safety in the workshops, ask the tutor or any Academy employee.

Smoking

Our premises are designated "no-smoking" areas and this must be observed at all times by all staff members, learners and visitors. Failure to do so will lead to disciplinary action.

Alcohol and illegal drugs

Alcohol and illegal drugs are not allowed onto the premises. Any member of staff or learner who is found with these substances or whose ability to work is impaired due to them may be suspended and subject to disciplinary action. We currently do not undertake any routine or random testing for drugs or alcohol but we reserve the right to do so.

Pregnant women and those of child bearing age

A separate risk assessment covering pregnant women and those of child bearing age is regularly reviewed by the Group Head of Security, Property & Facilities. Once the Academy is informed that a member of staff or learner is pregnant or is breast-feeding, a specific risk assessment will be undertaken for that individual. All necessary steps will be taken to reduce any risk to the employee or her child.

Young workers

A specific risk assessment is carried out before employing a young person (any person who has not attained the age of 18). In particular, we consider the inexperience, lack of awareness or risks and immaturity of young persons; the fitting-out and layout of the workplace and workstations; the nature, degree and duration of exposure to physical, biological and chemical agents; the form, range and use of work equipment and the way it is used; the organisation of processes and activities; the required training as regards health and safety and other specified risks.

In addition, we provide the parent with comprehensible and relevant information on the risk to health and safety identified by the assessment and the preventative and protective measures taken.

Manual handling

All reasonable effort is made to limit the need for manual handling within the business. However, where necessary, staff members are provided with information and training on safe handling.

VDU users

Regular risk assessments are carried out for those staff members who use VDUs on a regular basis and reasonable measures are taken to reduce the risk of repetitive strain injury. In addition, training is provided on the safe use of the equipment, and an assessment of each workstation undertaken. We meet the cost of regular eyesight tests and also the provision of spectacles for VDU use where these are deemed necessary.

Security

All reasonable efforts are made to provide secure premises and to ensure that employee can enter and leave our premises safely. Access to any potentially hazardous areas is limited to authorised persons. When leaving work at the end of a shift, employees are responsible for locking away confidential documents or valuable items. Anyone working on site or alone on our premises should be made aware of our lone workers' policy and ensure that they comply with the safety rules

relating

to

them.

Medical checks and health surveillance

If any medical tests are necessary prior to an employee joining, this will be made clear on the offer letter and in the contract. It is a term in all of our employment contracts that employees should undergo a medical examination at any time should we have concerns about their health and feel this to be necessary.

Implementation, monitoring and review of this policy

This policy will take effect from 16th November 2012. The Principal / Director has overall responsibility for implementing and monitoring this policy, which will be reviewed on a regular basis following its implementation (at least annually) and additionally whenever there are relevant changes in legislation or to our working practices.

Any queries or comments about this policy should be addressed to the Group Head of Security, Property & Facilities.

Aim of Policy

The aim of this policy, and the accompanying procedure, is to prevent bullying and harassment, to provide guidance, to resolve any problems should they occur and prevent further recurrence. This policy is not contractual, but aims to set out our goal.

We believe all our learners and staff, have the right to learn and work in an environment free from bullying behaviour and harassment, be it on the grounds of issues including but not exclusive to:

- Race
- Gender
- Disability
- Sexual orientation
- Religion or belief
- Age
- Marital status or civil partnership
- Pregnancy/maternity
- Gender reassignment or appearance

Bullying and harassment at the Academy are a violation of employment and discrimination laws, and may also contravene criminal and/or civil law in some circumstances. The damage, tension and conflict which harassment and bullying creates, not only results in poor morale, but also divides teams and reduced productivity. Such behaviour will not be tolerated and we seek to ensure that our learning environment is sympathetic to all our learners and staff and that they are treated with dignity and respect. It is the duty of Academy staff to implement and comply with this policy.

A member of staff who becomes aware of behaviour which breaches this policy, irrespective of whether a complaint has been made or not, has a responsibility to take the matter forward through investigation and ensure it is dealt with confidentially and promptly.

Examples of bullying and harassment

Bullying is defined as persistent behaviour against an individual that is intimidating, degrading, offensive or malicious and undermines the confidence and self-esteem of the recipient.

Harassment is defined as unwanted conduct that either violates a person's dignity, or creates an intimidating, hostile, degrading, humiliating or offensive environment for that person. It may be related to any personal characteristic of the individual (whether perceived or real), or by association (i.e. related to the individual's relationship or dealings with others who have that personal characteristic). It may be persistent or an isolated incident. It can take many forms, from relatively mild banter to actual physical violence.

Learners and staff may not always realise that their behaviour constitutes bullying or harassment but they must recognise that what is acceptable to one person may not be acceptable to another.

Bullying or harassment can be a single serious incident or persistent and repeated, continuing after the person subjected to it makes it clear he/she wants it to stop.

The examples below are not exhaustive but give a clear indication of the sorts of actions that constitute bullying or harassment. Serious examples may constitute gross misconduct which could lead to suspension or withdrawal from the course.

Unwanted physical conduct - such as unnecessary touching, patting, pinching, brushing against another person's body, insulting behaviour or obscene gestures, physical threats and assault.

Unwanted verbal conduct - such as unwelcome advances, patronising titles or nicknames, propositions or remarks, innuendo, lewd or suggestive comments, over-familiar behaviour, slogans or songs, jokes, gossip and slander (including speculation about a person's private life and sexual activities), banter or abusive/offensive language which is either threatening or refers to a person's gender, race (including colour and ethnic or national origins), disability, sexual orientation, religion or belief, age, marital status or civil partnership, pregnancy/maternity or gender reassignment.

Unwanted non-verbal conduct - such as racially or sexually based graffiti or graffiti referring to an individual's characteristics or private life, abusive or offensive gestures, leering, whistling, creation or distribution of suggestive or offensive pictures (including "pin-up" calendars) or videos through any means.

Bullying - includes unwanted physical contact or assault but also verbal bullying such as insulting or threatening comments, comments intended to undermine, belittle, embarrass or humiliate the recipient, persistent criticism or trivial fault-finding, and personal abuse, either in public or private, which humiliates or demeans the individual involved.

Virtual bullying - includes distribution of unwanted emails, texts, images or humiliating data published on social networking internet sites or abusing the Academy's facilities to contact a learner or staff member in an intimidating or malicious manner.

Coercion - including threats for refusal of sexual favours (or promises made in return for sexual favours), pressure to participate in political or religious groups etc.

Isolation or non-co-operation at work – including deliberate exclusion from conversations or social activities.

Learners and staff should note that any act(s) of bullying or harassment committed by them in the course of their studying at the Academy will be dealt with under this procedure. This includes not only situations occurring whilst at in the workshop or classroom, but also at any time on our premises, or externally whilst attending social functions or training courses etc. in the course of their employment.

It covers emails, phone calls and texts made outside of studying using either our equipment, as well as abusing staff and/or learners via social networking sites, such as Facebook.

The display of offensive material (including "pin-up" calendars) is not permitted and any such offending material will be removed and destroyed.

Procedure for dealing with bullying or harassment

The sensitive nature of complaints of bullying or harassment is recognised and therefore a choice of routes is provided in order to encourage learners and staff to discuss their problems in confidence with someone they trust and feel comfortable talking to.

Learners and/or staff who believes he/she has been the subject of harassment or bullying in the course of his/her study or whilst working, may either initially address the matter informally with his/her tutor [learner] or HR [staff]; and/or may make a formal complaint using the complaints procedure.

Dealing with bullying and harassment at an informal stage

If learners or staff feel s/he is a victim of bullying or harassment it should be made clear to the perpetrator that the behaviour is unacceptable and must stop. However, the Academy recognises that making a complaint of harassment is likely to be a distressing experience and that it might be difficult for a person to do. In these circumstances a person may request one of the people designated above to approach the alleged perpetrator on his/her behalf or to help take such action.

Formal Procedure

1. Where informal methods fail, or serious bullying or harassment occurs, learners/staff are advised to write a formal complaint and to seek assistance from one of the people designated above. It is important to establish the facts and details of the allegations must be provided i.e. support throughout the procedure is available upon request by any of the people designated above or by a person of their choice.
 - What happened?
 - Where did it occur?
 - Who was involved?
 - Was this the first incident?
 - When did it occur?
 - Were there any witnesses?
 - Has any action been taken to prevent further repetition of the behaviour?
2. An official complaint will be reviewed and investigated by designated staff members Adam Russell, Head of Quality and Irene Forti, Head of Human Resources. If these staff members are absent the investigation will be carried out by a member of the academy's management team.
3. A complaint will take up to 5 days to investigate and the Academy has the right to temporarily suspend a learner or staff member whilst the investigation takes place. In

extreme cases the Academy will refer the investigation to external parties such as the Police or the Local Authority Designated Officer (LADO) for complaints against staff.

4. The staff member who receives the complaint will carry out a thorough investigation as quickly as possible. When asking questions, it is important for staff to be sensitive and to take care not to phrase questions in a way that implies that the bullying/harassment may in some way have been directly or indirectly invited and to avoid remarks that appear to trivialise the experience or suggest that it was imaginary. The intention of the alleged bully/harasser is irrelevant; it is the effect on the complainant that is important.
5. All learners/staff, including any external parties, involved in the investigation are expected to respect the need for confidentiality. Failure on the part of staff to do so will be considered a disciplinary offence. Copies of statements made by witnesses will be made available to the victim and the alleged bully/harasser, but the names of the witnesses may be withheld if they request to remain anonymous, and particularly if they have a genuine belief or fear of reprisal.
6. Where the staff member in charge of dealing with the complaint believes that bullying or harassment may have taken place, if the alleged bully/harasser is an employee of the Academy, the matter will be under the jurisdiction of Irene Forti / head of Human Resources who will invoke the disciplinary procedure to ensure that the accused person has every opportunity to defend or explain his/her actions.
7. The accused person will be entitled to be accompanied at any disciplinary hearing. Common responses to allegations of bullying/harassment include denial or disbelief that the behaviour was offensive or was not welcome. None of this alters the fact that a complaint has been made which may lead to disciplinary action.
8. The severity of the penalty imposed upon the accused believed to be guilty of bullying/harassment will be consistent with other disciplinary offences. Where the accused is given a warning short of dismissal, discussions will take place with you, and, where necessary, any reasonable steps will be taken to alter working practices to minimise contact between you.
9. An accused who receives a warning or is dismissed for bullying or harassment may appeal against the penalty in accordance with our disciplinary procedure. In serious cases, for example rape or assault, criminal charges may be appropriate and it may be necessary to refer the case to the police. Where the complaint is made against a client, customer or other business contact, this will be investigated and such steps will be taken as are reasonably practicable to protect the learner.
10. Any learner/staff who brings a complaint of bullying or harassment will not suffer victimisation for having brought the complaint. The complainant should not be moved except at his/her request or in exceptional circumstances. However, if the complaint is untrue and has been brought in bad faith (e.g. spite) disciplinary action will be taken.

Following the investigation

Once the case has been resolved and time has been given to allow relationships to stabilise and return to normal in the workplace and/or classroom, contact should be maintained with the affected persons informally. If further problems of bullying, harassment or victimisation are being encountered, or the affected person continues to experience stress or anxiety, immediate action should be taken to investigate or find a solution.

Escalation of a complaint

Our bullying and harassment policy is intended to give guidance and support, taking into account the sensitivity and serious nature of such issues. However, if the outcome of a complaint is unsatisfactory, all parties have the right to appeal. Please view our appeals procedure for guidance on how to do this.

Making a complaint

If you are dissatisfied with the service, you have received then talk to a member of our staff or your tutor. If you are unable to resolve the situation, you will need to follow the procedure outlined in this document.

What is the procedure for complaints?

Stage 1

If you want to speak to someone about a complaint, you can call our offices on 020 7405 0197 (lines are open 9:00am to 6:00pm Monday to Friday, excluding bank holidays), where we will try to resolve the issue if we can.

If you prefer to put your complaint in writing, in the first place, write to the person who handled your query: that's usually the quickest way to resolve a problem. If you're still not satisfied, ask for your complaint to be escalated to their line manager.

We will need

- a completed complaints form detailing what your complaint is about
- copies of any correspondence related to the complaint
- your email address or postal address (so we can reply)

We will inform you that we have received your complaint within 48 hours. If we can't reply to you within this time, we will let you know and tell you when you can expect a reply.

What happens next?

The Head of Quality will investigate your complaint [looking at whether your questions were answered, whether you suffered any injustice and what remedy would be fair and proportionate in the circumstances]. They will inform you of the outcome of our investigations and respond within 10 working days. It is likely that the Head of Quality will contact you during the investigation for further information.

Stage 2

What to do if you are not satisfied

If you are dissatisfied with the way the complaint was handled at Stage 1, and/or wish to pursue your complaint, you may escalate the complaint to the Head of Academy within 10 working days of receiving the outcome from Stage 1.

If the complaint was dealt with by the Head of Academy at Stage 1, then you should submit a formal complaint to the CEO.

The Head of Academy or CEO may delegate the task of collating information concerning the complaint to another staff member, but not the decision, nor the action to be taken. The Head of Academy or CEO will meet with the complainant, hear the complaint, investigate and make every

effort to resolve the issue. Subsequent to this meeting, the Head of Academy or CEO will write to the complainant summarising the outcome reached and the process for appeal.

The complainants will be informed of the outcome of the investigation within 10 working days of the meeting with the Head of Academy or CEO.

Stage 3

What to do if you're not satisfied

The complainant needs to write to the Head of Academy or CEO within 10 working days of the date of the letter notifying them of the outcome of Stage 2, notifying that they wish their complaint to be heard by the Complaints Appeal Panel. The Chair will convene a Complaints Appeal Panel consisting of at least two members of the management team of Free2Learn who are independent from the management and operation of the Academy. All panel members will have no previous knowledge of the complaint.

The appeal panel hearing is the last Academy-based stage of the complaints process. The panel will meet with the complainant, hear the complaint, investigate and make every effort to resolve the issue having met with the Head of Academy or CEO.

The remit of the Complaints Appeal Panel is to:

- dismiss the complaint in whole or in part;
- uphold the complaint in whole or in part;
- decide on the appropriate action to be taken to resolve the complaint;
- recommend changes to the school's systems or procedures to ensure that problems of a similar nature do not recur.

Should the complainant wish to be accompanied at the panel hearing this will be allowed.

The panel will meet within 20 working days of receipt of the complaint. If no dates within this timescale are convenient to the complainant, the panel may meet outside this period.

The complainant will be notified in writing of the panel's decision, usually within 5 school days.

A copy of its findings and recommendations will be sent by electronic mail or otherwise given to the complainant and, where relevant, the person complained about and will be available for inspection on the Academy premises by the Head of Academy or CEO.

The letter will confirm the end of the Academy's involvement with the complaint.

The qualification awarding bodies such as SQA and C&G might be able to assist you in the complaints procedure but it will be your duty to contact them and the academy will have no involvement in this process.

Taking Action on Complaints

Complaints and grievances raised, will be collected, monitored and analysed by the management team. This will feed into the organisation's improvement plans as we are committed to high quality and learner satisfaction.

Complaints Form

Name:

Class \ Course:

Date:

Please list details of your complaint below (include details of time, date, location and person(s) involved if applicable):

Aim of Policy

This policy has been developed in accordance with the principles established by:

- the Children Act 1989 & 2004,
- the Education Act 2002
- 'Working Together to Safeguard Children' 2016
- Revised Safeguarding Statutory Guidance 2 'Framework for the Assessment of Children in Need and their Families' 2000.

The guidance also adheres to

- Keeping Children safe in Education' 2016
- Children and Families Act 2014
- Safeguarding Vulnerable Groups Act 2006
- DoH Statement of Government Policy on Adult Safeguarding 2013
- Prevent Strategy 2011
- Counter Terrorism and Security Act 2015, including the Prevent Duty/Multi agency Statutory Guidance on Female Genital Mutilation 2016.
- Information Sharing, Advice for practitioners providing safeguarding services to children, young people, parents and carers 2018

Definitions

For the purposes of this policy young people are any learners under the age of 18 and those whom are considered vulnerable. The Safeguarding Vulnerable Groups Act 2006 defines a 'vulnerable adult' as:

A person aged 18 and over who is or may be:

- receiving a social care service
- receiving a health service
- living in sheltered accommodation
- detained in custody or under a probation order
- requiring assistance in the conduct of his/her affairs
- receiving a service or participating in an activity targeted at older people, people with disabilities or with physical or mental health conditions

Purpose of this policy

The purpose of this policy is to provide advice for staff and associates working with us on helping us to meet our commitment of ensuring that any child or vulnerable adult receiving any form of training, advice or guidance through us is protected from all forms of exploitation and abuse.

We have interpreted and acted on substantial guidance to take preventative measures to protect young people and vulnerable adults from abuse: physical; sexual; psychological/emotional; financial or material; neglect and acts of omission and impairment to their personal and social development.

Our policy is to ensure so far as is possible that all who work with us maintain a proper focus on safeguarding. Our policy is also based on the notion that “It is unlawful for the body responsible for an educational institution to discriminate against a disabled person” (Disability Discrimination Act 1998, 2005).

Our responsibilities

- Promote the health and welfare of young people and vulnerable adults by providing opportunities for them to take part in our programmes safely (Children Act, 2004).
- Respect and promote the rights, wishes and feelings of young people and vulnerable adults.
- Promote and implement appropriate procedures to safeguard the well-being of young people and vulnerable adults and protect them from abuse.
- Support staff and associates to adopt best practice to safeguard and protect young people and vulnerable adults from abuse and to minimise risk to themselves.
- Require staff and associates to adopt and abide by this Safeguarding Policy
- Respond to any allegations of misconduct or abuse of young people or vulnerable adults in line with this policy.
- Conduct CRB/DBS checks with all the staff who are in contact with learners
- Ensure staff carry out Safeguarding/refresher training once a year and provide certification
- Ensure all staff and learners wear ID badges at all times whilst on the premises

Principles

The welfare of young people and vulnerable adults is everyone’s responsibility, particularly when it comes to protecting them from abuse. Young people and vulnerable adults have a lot to gain from us. Our programmes provide an excellent opportunity for participants to learn new skills, grow in confidence and maximise their potential.

This policy is based on the following principles

- The welfare of young people and vulnerable adults is the primary concern.
- All young people and vulnerable adults, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identity have the right to protection from abuse.
- It is everyone’s responsibility to report any concerns about abuse and the responsibility of the Social Services Department and the Police to conduct, where appropriate, a joint investigation.
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately (Dealing with Allegations of Abuse against Teachers and other staff. Department for Education, 2011)
- All personal data will be processed in accordance with the requirements of the Data Protection Act 1998.

All staff in contact with children and vulnerable adults will have CRB/DBS clearance Local (Safeguarding Children’s Board Minimum Standard for Safer Recruitment, 2010).

Code of Behaviour - for all staff and associates

- Staff and associates must respect a young person's/vulnerable adult's rights to privacy and encourage them to feel comfortable enough to report attitudes or behaviour they do not like.
- Our staff and associates are expected to act with discretion with regard to their personal relationships. They should ensure their personal relationships do not affect their professional role within the organisation.
- All staff and associates should be aware of the procedures for reporting concerns or incidents, and should familiarise themselves with the contact details of the **designated person**.
- If a member of staff or associate finds himself or herself the subject of inappropriate affection or attention from a young person/vulnerable adult, they should inform the designated safeguarding lead.
- If a member of staff or associate has any concerns relating to the welfare of a young person/vulnerable adult, be it concerns about actions or behaviour of another staff member or associate or concerns based on any conversation with the young person/vulnerable adult, particularly if an allegation is made, they should report this to the **designated person**.
- Staff and associates should not start an investigation or question anyone after an allegation or concern has been raised. Staff or associates should just record the facts and report these to the **designated person**.

BAJ's Designated Safeguarding Lead and Deputies:

- Adam Russell Designated Safeguarding Lead [Head of Quality 020 7405 0197 ext. 383]
- Lili Capelle Deputy Safeguarding Officer [Head of Apprenticeships 020 7405 0197 ext. 381]
- Sarah Arnold Safeguarding Officer [Lead IQA & Tutor 020 7405 0197 ext. 381]

The designated and deputy safeguarding person will hold an up to date safeguarding qualification and relevant experience. In circumstances where it is not possible or inappropriate to raise with the Designated Safeguarding Officer or the deputies, matters should be referred to the Head of Academy, Sofie Boons.

These staff members

- will know how to make an appropriate referral and signpost at risk students.
- will be available to provide advice and support to other staff on issues relating to safeguarding and Prevent Duty
- have particular responsibility to be available to listen to young people and vulnerable adults studying at the Academy or on placement
- will deal with individual cases, including attending case conferences, Channel meetings and review meetings as appropriate
- have received training in safeguarding, Prevent and issues and inter-agency working, as required by the Children's and Adults Safeguarding Boards and will receive refresher

training at least every 2 years.

All allegations of abuse or harm will be treated seriously and consistently. This may lead to an investigation of a possible criminal offence by the police, involvement of an appropriate social care worker or an investigation of our provision and consideration of disciplinary action on staff or learners.

Definitions of abuse

Physical abuse

This may include 'hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions'

Some of the recognised signs of physical abuse are:

- unexplained burns
- scratches
- bruising and abrasions
- drowsiness from misuse of medication; and
- anxiety in the presence of an abuser

Sexual abuse

This may include 'rape and sexual assault or sexual acts to which the vulnerable adult has not consented, or could not consent or was pressured into consenting'

Some of the recognised signs of sexual abuse are:

- changes in behaviour
- bruising
- sexually transmitted diseases
- sexualised behaviour

Psychological/emotional abuse

There is a strong similarity between the descriptions of these. Emotional abuse is generally described as an element of psychological abuse.

Psychological abuse may include emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Some of the recognised signs of psychological or emotional abuse are:

- fear
- passivity
- confusion
- apathy
- lack of eye contact

- low self-esteem
- disturbed sleep patterns
- reluctance to talk openly

Financial or material abuse

This may include 'theft, fraud, exploitation or the misuse or misappropriation of property, possessions or benefits'

Some of the recognised signs of financial or material abuse are:

- loss of jewellery and personal property
- lack of money to purchase basic items
- a bill not being paid when money is entrusted to a third party
- inadequate clothing
- unexplained withdrawal of cash
- loss of money from a wallet or purse

Female Genital Mutilation (FGM)

Female genital mutilation is any procedure that's designed to alter or injure a girl's (or woman's) genital organs for non-medical reasons. It is sometimes known as 'female circumcision' or 'female genital cutting.' It is mostly carried out on young girls. (DoH 2014) All staff are required to undertake online FGM awareness training.

Peer-on-Peer

Peer-on-Peer is when a young person is exploited/abused by their peer(s), the abuser is the same age, or close in age to the young person. At the very least, everyone directly involved in the abuse is under 18 years of age.

Cyber Abuse

Whilst modern technology is embraced at the Academy, we are mindful of the potential for bullying to occur. All staff must undertake annual training in e-safety. In alignment with our general policies on anti-bullying, we stand by the belief that:

- a) all learners have a right not to be bullied and
- b) bullying is always unacceptable

Definition of Cyber-Bullying

Whilst there is no legal definition of cyberbullying within UK law, in accordance with the Department for Education it can be described as: 'The use of Information and Communications Technology, particularly mobile phones and the internet, deliberately to upset someone else.' Adding that: "Upsetting someone can take a variety of forms. It can involve threatening, distressing or humiliating a target, and, as such, encompasses a wide range of behaviours".

The following categories are considered as cyber-bullying:

- bullying by texts or messages or calls on mobile phones
- the use of mobile phone cameras to cause distress, fear or humiliation
- posting threatening, abusive, defamatory or humiliating material on websites, to include blogs, personal websites, social networking sites
- using e-mail to message others
- hijacking/cloning e-mail accounts
- making threatening, abusive, defamatory or humiliating remarks in chat rooms

The Academy uses appropriate security systems to restrict access to harmful or explicit material including firewalls and anti-virus software. Where appropriate, the Academy audits ICT communications and regularly reviews the security arrangements in place.

All cases of Cyber Abuse and Cyber-Bullying should be reported to the Designated Safeguarding person.

Neglect and acts of omission

This may include 'ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate heating and nutrition'

Some of the recognised signs of neglect and acts of omission are:

- dehydration
- infections
- malnutrition
- hypothermia

Hate Crime

This may include abuse, bullying and harassment based on the individual's age, sex, disability, religion, race or ethnicity or sexual orientation. A hate crime is when someone is targeted as a direct result of their disability, sexual orientation, gender-identity, race, religion or belief. (Police & Crime Commissioner 2016)

Radicalisation and Extremism

These definitions are taken from the HM Government Prevent Strategy 2011. All staff are required to undertake an annual online Prevent training and assessment.

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate on terrorist activity.

Extremism is vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of the armed forces.

Children and young people can be drawn into violence or they can be exposed to the messages of extremist groups through a number of different mediums. This can put the child or young person at risk of being drawn into criminal activity and has the potential to cause significant harm. There is no such thing as a 'typical extremist', and those involved come from a range of backgrounds and experiences. The following indicators have been provided to help professional's identify factors that may suggest a child or young person may be vulnerable to radicalisation.

- Family tensions, unstable home environment
- Social isolation, confusion over identity
- Migration
- Experience of racism or discrimination

A child or young person may be attracted to extremism because:

- They are trying to make sense of world events
- They feel that their culture or religion is under threat
- It makes them feel a sense of identity or belonging or being part of something
- They are looking for adventure or excitement; young people who exhibit risk taking behaviour may be attracted to the sense of danger
- They have a personal grievance or experience of racism or discrimination and feel they want to change things.
- They are under pressure from their peers who have links with these groups.

A child or young person who is in the process of being radicalised may display the following signs:

- A change in communication
- Refusal to listen to others
- Use the term us and them
- A change in language
- Distancing themselves, isolation and secretive behaviours
- Made new friends who have radical or extremist views
- Spending a lot of time online, accessing extremist literature and imagery
- Appearing angry about governmental policies, especially foreign policy
- Belief in conspiracy theories
- Owning mobile phones or devices you haven't given them

Related documents:

Prevent Policy

FGM Policy

Flowchart for Raising Safeguarding Concerns

Aim of Policy

To offer a broad range of courses to a varied learner population, and to ensure that learners are appropriately matched to a programme of study and make informed choices about their future direction.

We provide access for those who would not otherwise contemplate further education and prepare students for life beyond the Academy. The Academy aims to attract and retain learners who have the potential to succeed and offer educational opportunities for learners from a wide and diverse community.

Purpose of Policy

The purpose of the policy is to ensure that the admissions process is consistent and fair to all applicants and to provide advice for staff and associates working with and for the Academy; whilst providing an inclusive learning environment, whereby our learners develop their personal and intellectual potential. The Head of Business and Product Development has overall responsibility for the operation of this policy. The selection criteria and interview procedure are reviewed from time to time, and adjusted as appropriate. The Admissions Policy is regularly monitored and reviewed, and may be subject to change.

The Academy aims to

- Be consistent throughout the application, interview, offer and enrolment process
- Be committed to providing clear, accurate, complete and accessible information on its courses, relevant entry requirements and associated admissions procedures.
- Be accountable to all stakeholders
- Be committed to ensuring equality of opportunity for all persons seeking to study with the Academy
- Ensure each applicant is individually assessed, without partiality or bias, in accordance with the policy on equal opportunities

Confidentiality: personal information will only be passed on with the applicant's or learner's consent.

Career Information, Advice and Guidance: this service is available, free of charge to all eligible applicants. We provide self-service careers information, individual guidance interviews and career planning. Appointments are currently available 9.00am - 5.30pm Monday to Friday and may be booked via any point of contact with the Customer Service and Recruitment team. The availability of this service is under constant review and is subject to change to enable access to all who require the service.

Accessibility – information advice and guidance will be accessible to all eligible users.

Further help - is available for applicants with learning difficulties and/or disabilities. Applicants are asked to contact the Customer Service and Recruitment Team for further information.

Policy Statements

Potential learners receive advice and guidance from the Customer Service and Recruitment team and/or course tutors to support learners' decisions as to the course of study best suited to their needs. Learners applying for full-time, part time or apprenticeship programmes requiring interviews are made aware of the admissions procedures. Opportunities for learners to view the Academy and its facilities prior to the commencement of a course are currently arranged through one to one visits.

Entry requirements vary between programmes of study and course level and apply to all new and existing learners. Details are available on the website and corresponding information leaflets. In addition to the specific entry criteria for each course/programme the Academy requires each learner to be motivated and committed to their studies.

The Academy reserves the right to request references and/or school reports for applicants depending upon the course/apprenticeship they are applying for; and may choose to interview once the relevant references and/or school reports have been received.

Any criminal convictions declared by an applicant need to be declared to the Customer Service and Recruitment team at the application or interview stage. Certain convictions may lead to a refused enrolment.

The Academy reserves the right to refuse admission to an applicant/learner who has previously been excluded from this or any other educational institution.

The Academy reserves the right not to admit an individual who previously attended the Academy but failed to make sufficient progress towards successfully completing their course/programme.

The Academy recognises its duty of care to learners and staff, and reserves the right not to admit a learner where there is evidence that there could be a threat or danger to others.

The Academy reserves the right not to admit a learner who has any outstanding debts with the Academy.

The Academy interviews and holistically assesses all applicants, applying for accredited courses, using all available information including but not limited to:

- Academic record, including degree, BTEC, diploma, GCSE and AS (or equivalent) grades and marks and A Level (or equivalent) grades or predictions
- School/college or employer reference
- Personal statement
- Submitted work, where requested
- Results of initial and diagnostic assessment performance at interview

The outcome of the interview is communicated to the applicant and he/she will receive either a conditional offer along with the details of any conditions that need to be met; or advice on alternative options and/or courses available.

Applicants must accept the offer and return all requested documents to the Customer Service and Recruitment Team within five working days or during the Assessment day, whichever is the latter. The applicants place on the course will not be confirmed until the conditions have been met in full.

All offers are made on the basis of:

- There being sufficient demand for the course offered
- There being sufficient spaces available on the course concerned
- Meeting the entry requirements of the chosen course as specified on the website and course information leaflet

- Appropriate employment being secured for apprenticeship programmes

Learners may be offered an alternative course, or added to a waiting list, or signposted to other institutions.

For non-accredited courses, applicants do not have to complete an application form or go through the interview process.

The Academy requires learners to be either funded by a government body, self-financing or using an Advanced Learning Loan in order that the Academy receives payment for the cost of studying. All fees must be paid in full before the course begins.

All learners on a programme of study, traineeship or apprenticeship programme must complete all elements of the recruitment, enrolment and induction processes.

Learners with a learning difficulty or disability can access appropriate support through the learning support referral route and will have opportunities to disclose a support need during the recruitment and enrolment process.

Learners who withdraw for any reason after course tuition will still be liable to pay the outstanding balance.

Information collected in the recruitment and enrolment processes will adhere to the current legislation concerning data protection.

The Academy actively supports and promotes equality and diversity in all matters relating to education and employment. Consequently, the Academy aims to identify and eliminate attitudes, practices and procedures which discriminate against people on grounds of age, gender, race, sexual orientation, disability, religion/belief, gender re-assignment, social background, marital status, nationality/citizenship or any personal characteristic of the individual(s) and the actions or comments are viewed as demeaning and unacceptable to the recipient.

Admissions Appeals and Complaints

All appeals and complaints received from applicants, schools or other agencies regarding the application process will be addressed individually. All appeals and complaints should be referred to the Head of Customer Service and Recruitment.

The Head of Customer Service and Recruitment will conduct an initial investigation and forward all relevant paperwork to the Head of Business and Product Development. A response to the appeal or complaint will be made in writing within twenty working days or receipt.

Customer Service and Recruitment Contact Details

Email Address: admissions@baj.ac.uk

Diploma courses offered at British Academy of Jewellery:

Our learners are diverse in their abilities and range from complete beginners through to professionals working in the jewellery industry who wish to further develop their skills. Our Diploma courses last approximately ten months and will provide the learner with the skills needed to work in the jewellery and design industry. We offer qualifications from Level 3 (Intermediate) to Level 4 (Higher).

Level 3 Diploma in Jewellery Manufacture and Design (SQA)

Level 4 Diploma in Jewellery Design and Manufacturing (SQA)

Our Diploma courses are all a minimum of 546 GLH. These courses are suitable for all learners and are study programmes.

All learners aged 16 -18 years old complete the following components:

- Main aims
- English GCSE if the learner has gained a grade D or 3 previously/or English Functional Skills if the learner has gained an E or below *[please ask for further guidance]*
- Maths GCSE if the learner has gained a grade D or 3 previously/or maths Functional Skills if the learner has gained an E or below *[please ask for further guidance]*
- Work experience

All learners aged 19+ years old complete the following components:

- Main aims

Our September/October starts are primarily run over two full days equating fourteen hours a week. British Academy of Jewellery advises applicants to seek advice on how enrolment could affect their personal income and circumstances. All applicants must obtain an application form, which is available either from 5 St Cross Street, Hatton Garden, London, EC1N 8UA or by emailing: Admissions@baj.ac.uk

The completed form should be returned to the Admissions Team, British Academy of Jewellery, 5 St Cross Street, Hatton Garden, London, EC1N 8UA.

Apprenticeships

Apprenticeships are a great way of studying for a Diploma level qualification whilst working.

Level 3 Jewellery Manufacturing (C&G)
Level 2 Jewellery Retailer Standard (C&G)
Level 3 Jewellery Retailer Standard(C&G)

Our apprenticeship programmes are entirely employer led, and bespoke to both the industry and the employer. Our apprenticeship vacancies, are applied for by either submitting an application form or applying through the National Apprenticeship Service, a member of the Admissions Team will contact you within 48 hours to confirm that you are eligible to be on the programme you have applied to. Please ask the Admissions Team for more details.

Applying for Diploma course or Apprenticeship programme at British Academy of Jewellery:

Verifying eligibility

In addition to the specific entry criteria for each course/programme the Academy requires each learner to be motivated and committed to their studies.

All applicants are invited to attend the Academy for an initial interview, and must bring the following documents:

- Proof of ID [*passport and visa [if appropriate]/birth certificate*]
- English and maths qualifications [*16-18 and/or Apprenticeship applicants*]
- NI number
- Proof of benefits if applicable [*ESA or JSA*]

All applicants will receive information on the course, fees and tools and materials they will be required to purchase prior to the start of the course.

All eligible applicants are invited to an assessment day held at one of our sites:

Following the interview Applicants receive either a conditional offer of a place on a Diploma course immediately, along with the details of any conditions that need to be met; or advice on alternative options and/or courses available.

The Diploma Course Offer

1. Applicants must accept the offer and return all requested documents to the Admissions Team within five working days. The applicants place on the course will not be confirmed until the conditions have been met in full.
2. If the applicant wishes to pay fees using a credit or debit card, please contact the Admissions Team on 020 7405 0197 between 9am – 5.30pm every Monday – Friday (excluding bank holidays). Please note that we do not accept cash or cheques as payment for course fees.

The Apprenticeship Programme Offer

1. Applicants receive either a conditional offer of a place on the apprenticeship programme immediately, along with the details of any conditions that need to be met; or advice on alternative options and/or courses available.
2. Applicants must accept the offer and return all requested documents to the Admissions Team within five working days. The applicants place on the apprenticeship programme will not be confirmed until the conditions have been met in full.
3. Please note that this does not mean that the applicant has secured an apprenticeship. It means that the Academy is now committed to matching the applicants CV to our vacancies.
4. Once an employer hires the applicant, the enrolment onto the apprenticeship programme is completed.

Induction Day

On the first day of the Diploma/Apprenticeship programmes, all learners are invited to take part in an Induction programme. Here they are provided with more information on the programme and given the opportunity to meet other learners and the staff. The induction includes activities that help settle the learners into Academy life and attendance is mandatory for all learners, both new and progressing.

Short Qualifications

The short programmes are designed to engage all learners by inspiring them to develop their creative skills, and sparking their imagination for the future.

These short qualifications:

- introduce the learners to the industry and possible careers
- prepare learners for self-employment
- introduce learners to specialist areas

and are the ideal stepping stone for the learners to progress onto our Diploma courses or onto an Apprenticeship.

All applicants must obtain an application form, which is available either from: Recruitment Team, British Academy of Jewellery, 26-30 Morley House, Holborn Viaduct, London, EC1A 2AT or by emailing: recruitment@baj.ac.uk.

The application form is held by our Recruitment Team until there are sufficient applicants interested.

The completed form should be returned to: Recruitment Team, British Academy of Jewellery, 26-30 Morley House, Holborn Viaduct, London, EC1A 2AT or by emailing: recruitment@baj.ac.uk.

Appeals and Complaints

All appeals and complaints received from applicants, schools or other agencies regarding the application process will be addressed individually. All appeals and complaints should be referred to the Head of Admissions.

COURSE FEES PAYMENT - TERMS AND CONDITIONS 2018/19

Aim of the Policy

This document aims to outline the Academy's policy and procedures in regards to payment of course fees by learners or sponsors.

This document is applicable to all learners enrolled onto any programme of learning delivery by British Academy of Jewellery.

If you experience difficulty with paying your course fees, you should immediately contact the Admissions Team on 020 7405 1097 or email Admissions@baj.ac.uk.

All learners who need to pay course fees will be required to pay in full the cost of the course before the start of their course.

British Academy of Jewellery bank details for processing payments

Payment Methods – BACS Transfer/Credit and Debit Card

Learners can pay their fees using the following methods:

BACS transfer or credit or debit card

- Please contact the Admissions team on 020 7405 0197 to process payment.
- We accept Visa/Delta, MasterCard, Maestro and Electron.
- An email will be sent to you from the Finance department to confirm payment has been processed attached with a remittance

The Academy does not accept the following methods of payment:

- Cheque
- Cash
- Credit Card – American Express only

Company Name	British Academy Of Jewellery
Bank Name	Barclays
Account Number	10856584
Sort Code	20-37-83
Swift Code	BARCGB22
IBAN Code	GB21 BARC 2037 7510 8565 84

Payment Methods – Advanced Learning Loan

- Advanced Learning Loan (only for learners doing a Level 3 or higher qualification and are 19 years +)
For more information please visit: <https://www.gov.uk/advanced-learning-loans>
- Advanced Learning Loans are administered by Learner Finance England (SFE). Learner Finance England is a Learner Loans Company service, providing financial support to learners on behalf of the UK Government.
- Learners can apply for an Advanced Learning Loan for courses starting on or after 1 August 2016. These loans help learners aged 19 or above pay the fees charged by colleges and training providers for

courses at Level 3, 4, 5 and Level 6. Level 3 and Level 4 courses include A levels, Access to Higher Education Diplomas and other Certificates and Diplomas.

- d) Getting a loan does not depend on the learner's household income and there are no credit checks. The learner will not have to pay anything back until he or she is earning over £21,000 a year. Once the learner is earning over this amount, he or she will pay back 9% of the earnings they receive above this figure.
- e) To apply for the Advanced Learning Loan, the learner can contact the Admissions department and speak to member of the team. The learner will be issued with a document confirming the course details that he or she will need when applying for the loan.
- f) The Admissions Team must receive the original approved loan letter at least **10 working days prior** to the course start date to confirm enrolment onto the course.
- g) If you have had the loan approved to cover part of your tuition fees, you or your nominated sponsor are expected to pay the outstanding course fee amount at least 10 working days prior your course start date to confirm your enrolment onto the course.

Sponsors

- a) If your employer or other organisation agrees to pay all or part of your course fees, the Academy will invoice them for the appropriate amount. (Please note that parents, family and friends are excluded from this category. If they assist with your fees, you are classified as self-financing and must pay the fees accordingly)
- b) Please ensure that your employer or other organisation provides the Academy with the following information, either by an official letter on company headed paper and signed by an authorised person, or an official signed purchase order:
 - The learner's (your) full name, course name and group number.
 - The course fee amount they will pay and the academic year.
 - The name of a responsible individual, organisation and address to whom the invoice should be sent.
 - A reference (or purchase order number) to be quoted (if applicable)Please send the letter to the admissions team in the Admissions department after you receive your course offer/learning agreement letter. The letter will be given to the Finance department who will contact your sponsor to confirm the details in the letter and process payment.
- c) The Academy reserves the right to not accept a sponsor.
- d) The Academy reserves the right to not accept a sponsor's letter or purchase order if the necessary information is not complete.
- e) Full payment must be processed 10 days prior to your course start date.
- f) If your sponsor fails to pay, or withdraws their support at any point in the year, you are still responsible for any outstanding fees and the Academy will hold you liable for this amount.

Refunds

- a) Money paid for course fees or deposits can only be refunded if a course is cancelled or postponed by the Academy for any reason.
- b) We are unable to provide refunds in cases of illness, personal problems, relocation or change of mind about enrolment which result in you having to withdraw from the course.
- c) Where a learner is originally enrolled and expected to pay tuition fees and 15 days prior to the course start date, their funding status changes which results in not having to pay tuition fees, any money paid for tuition fees will be refunded to the learner or sponsor.
- d) If you are entitled to a refund, please contact the Admissions Team. A member of staff will confirm if you are eligible for a refund in line with our policies and will pass the request to the Head of Admissions for review.

- e) The Head of Admissions will inform the Finance department of the decision and a refund will be processed to the account used to pay course fees if needed.
- f) The Finance department will notify the learner of when the refund will be processed; which will usually be within 30 days of the receiving the Refund Request Form.
- g) All refunds will be made in £ sterling. Any bank charges or currency conversion costs incurred in making a refund shall be borne by the learner, sponsor or the third party receiving the payment.

Withdrawals and Transfers

- a) If you are awarded Discretionary Learner Support Fund or any bursaries from British Academy Of Jewellery and you withdraw from the course, you will have to pay back the fund/bursary to the Academy in one full amount immediately.
- b) If you received the Advanced Learning Loan to cover part or the full tuition fee, the Learner Loan Company (SLC) will be notified and you will be contacted directly by the SLC to discuss repayment of the loan.

Aim of Policy

To ensure the Academy is a safe learning environment for all learners and to stop people becoming terrorists or supporting terrorism.

The British Academy of Jewellery believes equality and diversity is integral to our inclusive curriculum, creative innovation, national reputation and the richness of Academy life. We are committed to providing an environment that promotes safety, positive wellbeing, equality and celebrates diversity. This contributes to sustaining an accessible and inclusive environment for all learners, staff, alumni, governors, visitors, community and commercial partners that we engage with.

BAJ's learner body includes people aged 16 years + from ethnically, socially and economically diverse backgrounds. The age and profile of our learners make it crucial to be involved in the PREVENT strategy.

PREVENT is part of a Government initiative to develop a robust counter terrorism programme – CONTEST.

The PREVENT strategy seeks to:

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to PREVENT people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health

A system of threat level has been created which represents the likelihood of an attack in the near future. The five levels are:

- Critical- an attack is expected imminently
- Severe – an attack is highly likely
- Substantial – an attack is a strong possibility
- Moderate – an attack is possible but not likely
- Low – an attack is unlikely

The current threat level from international terrorism in the UK is currently at 'SEVERE' which means that a terrorist attack is a strong possibility.

Education, like other key sectors, has a responsibility to promote value, openness, tolerance and facilitating free debate, the attributes central to being a British citizen. BAJ seeks to embody these values of openness, free debate and tolerance, and promote them through the way we operate on all levels.

PREVENT and Safeguarding

PREVENT is part of safeguarding at BAJ. The policy and procedures are well established and well understood by staff. Both are kept in a central location for quick access and reference. Reports which contain concerns raised under PREVENT are presented to the Safeguarding Team and the Senior Management Team on a weekly basis.

A Co-ordinated Strategy

Holts Academy has been working on a range of initiatives which supports the PREVENT agenda:

- Mission & Values steering groups
- Equality & Diversity Champions
- Learner Voice Activities and Council
- Safer recruitment
- Employer Forums
- Learner Engagement and Enrichment
- Continuous staff development training
- Staff and learner inductions

Links to other policies and documents

Responding to PREVENT will require reference to other relevant guidance, policies and procedures. These will include policies and procedures relating to:

- Safeguarding Children and Vulnerable Adults
- Learner Charter
- Learner Handbook
- Admissions Policy
- Attendance & Punctuality Policy
- Health and Safety Policy
- Equality and Diversity Policy
- Bullying and Harassment Policy
- ICT Users Policy
- Employee Handbook

Key Objectives

This strategy has five key objectives:

1. To promote and reinforce shared values; to create space for free and open debate; and to listen and support the learner voice.
2. To break down segregation among different learner communities by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all learners in playing a full and active role in wider engagement in society
3. To ensure the safety of learners and that the Academy is free from bullying, harassment and discrimination
4. To provide support and appropriate sources of advice and guidance for learners who may be at risk
5. To ensure that learners and staff are aware of their roles and responsibilities in preventing violent extremism and the process of declaring any concerns

In order to achieve these objectives, the strategy will concentrate on six areas

1. Leadership, Management and Values

To provide an ethos which upholds core values of shared responsibility and wellbeing for all learners, staff and visitors and promotes respect, equality and diversity and understanding.

This will be achieved through:

- Promoting core values of respect, commitment, integrity and innovation including equality and diversity, democratic society, learner voice and participation
- Creating Equality & Diversity champions across the Academy staff, learners, community and business partners
- Building staff and learner understanding of the issues and confidence to deal with them
- Deepening engagement with local communities
- Actively working with local schools, local authorities, police and other agencies
- A designated senior manager to implement the PREVENT Duty Risk Action plan with effective consultation from the Local Authority and Police PREVENT leads, safeguarding consultants e.g. NSPCC, Islington Safeguarding Children Board and the Camden HE/FE PREVENT Coordinator
- A senior duty officer and system to manage critical incidents, respond to tensions on or off the Academy training sites which might impact upon staff, learners and/or public safety

2. Training

All Academy staff members and Governors receiving WRAP (Workshop to raise awareness of PREVENT) training from the HE/FE PREVENT Coordinator based in Camden and Birmingham. Training is provided for new staff as part of the staff training programme and is part of the whole Academy safeguarding and child protection training plan

- Providing WRAP training to employers which will enable the Academy to further embed practice from across our stakeholders
- Training for class representatives once in post to raise their awareness of key factors and/or concerns
- Promoting safeguarding and PREVENT at learner inductions and distributing promotional literature to raise awareness

2. Teaching and Learning

To provide a curriculum which promotes knowledge, skills and understanding to build the resilience of learners, by undermining extremist ideology and supporting the learner voice.

This will be achieved through:

- Embedding equality, diversity and inclusion, wellbeing and community cohesion
- Promoting wider skill development such as social and emotional aspects of learning
- A curriculum adapted to recognise local needs, challenge extremist narratives and promote universal rights through various projects, events and campaigns
- Developing the learners critical thinking skills which will support them in resisting extremism
- Encouraging active citizenship/participation and learner voice
- Focussing on narrowing the attainment gap for all learners

3. Learner Support

To ensure that staff are confident to take preventative and responsive steps working with partner professionals, families and communities.

This will be achieved through:

- Establishing strong and effective learner support services and processes
- Listening to what is happening in the Academy and the community through learner voice mechanisms including learner council and satisfaction surveys
- Implementing anti-bullying strategies and challenging discriminatory behaviour
- Helping learners and staff know how to access support in the Academy and/or through community partners
- Signposting or providing in-house welfare, pastoral and chaplaincy support that meets the demographic of our learners
- Signposting learners to external prayer facilities and ensuring good governance and management procedures are in place for activities in these facilities
- Supporting at risk learners through safeguarding and crime prevention processes
- Focussing on narrowing the attainment gap for all learners

4. Learner Engagement and Enrichment

BAJ has started to implement a learner engagement and enrichment strategy to enable learners to engage at all levels of the organisation to shape and enhance the learner experience.

Initiatives are being explored or have been introduced to strengthen the cohesion of our learners and staff including:

- Learner Voice
- Learner Council
- Learner Progress Reviews
- Learner Induction sessions
- Enrichment activities
- Learner social activities
- Raising awareness and promoting events that celebrate our diverse learner community focusing on cultures and faith as part of the Equality, Diversity and Inclusion Calendar
- Supporting a multi-faith group where learners interact through structured discussions and debates
- Operating a text service line for learners to raise concerns to the safeguarding team
- Run a series of campaigns throughout the year in connection with the Learner Council and the Equality and Diversity Champions which provide opportunities to carry out PREVENT work.

5. Managing Risks and Responding to Events

To ensure that the Academy monitors risks and is ready to deal appropriately with issues that may arise.

This will be achieved through:

- Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on the Academy
- Understanding and managing potential risks within the Academy and from external influences
- Introducing a new Safe Working Practice Guide which identifies the behaviours it expects from all staff
- Safer recruitment practice
- Lone working in and out of the workplace training for all relevant staff
- Robust risk assessments and reviews of visitors, lecturers, suppliers and contractors
- Creating and monitoring a learner risk register and training admissions staff to be able to identify and raise concerns prior to a candidate enrolling on any of our programmes

- Supporting and encouraging staff to develop and use the skills required to challenge appropriately
- Develop learning/ expert coaches, delivery staff and class representatives who will have the knowledge, skills and confidence to lead debates about controversial issues
- Responding appropriately to events in local, national or international news that may impact on learners and communities
- Ensuring measures are in place to minimise the potential for acts of violent extremist within the Academy
- Creating an infrastructure and embedding processes and resources that will help to respond appropriately to a threat or incident within the Academy
- Developing effective ICT security and responsible user policies
- Referrals being made to Channel (a process which supports people at risk of being drawn towards terrorism) through the Designated Safeguarding Person (DSP) who will refer to Channel if appropriate.
- Referring immediate causes for concern, where appropriate to our local Police Forces in London and Birmingham.

Aim of Policy

The aim of our disciplinary policies is to:

1. To ensure the Academy is a safe learning environment for all learners free of, any incidents which involve breaking the law, including all drug related incidents; any behaviour which involves bullying or harassment of any form and where all learners can learn, achieve and succeed.
2. Provide learners with ample opportunity to learn from their mistakes while still preserving the environment where they and all other learners can learn, achieve and succeed.

Discipline as it applies to admissions

When learners are dealing with any member of staff, we expect them to behave respectfully and appropriately. This is doubly true when we are enrolling them in courses and helping them get support or funding.

With that in mind, Admissions reserves the right to refuse service to anyone. This means certain behaviours are considered unacceptable during the admissions process:

- Verbally assaulting tutor or learners, including negative, dismissive, and threatening attitude and behaviour towards staff
- Failure to arrange for payment for course on time and before the course start date
- Lateness or failure in submitting and signing required admissions documents/forms
- Failure to attend admission interviews.

Any of the above behaviours may result in admissions refusing to help the learners, and their enrolment being cancelled.

Discipline as it applies to enrolled learners

The Academy has a zero tolerance to all incidents which involve breaking the law, bullying or harassment or any other behaviour that results in any learner being unable to learn or progress on their course, or a member of staff carrying out their role. Any such incident will be dealt with in line with our disciplinary process. Any incident of this nature will result in immediate removal and expulsion from the Academy. We also reserve the right to contact an external agency such as the Police in severe cases.

All students will be on a probationary period for the first 42 days of a course. During this period students can be excluded immediately without consulting our levels of misconduct framework. We reserve the right to remove students on the grounds of poor behaviour, not meeting assignment deadlines and attendance and punctuality below 95%.

Escalation and Levels of Misconduct

Escalation is the point at which we have no choice but to take disciplinary action on a learner at the next higher level.

Not all offenses are equal in severity. There are different levels of misconduct, each of which will bring a learner.

In all cases of misconduct the Academy reserves the right to use its discretion if an activity is deemed serious to automatically suspend or withdraw a learner pending a disciplinary hearing.

Examples of Each Level of Misconduct

1. Minor Misconduct

The first level of misconduct encompasses minor cases of misbehaviour. The urgency of escalating these minor misbehaviours depends on the level of disruptiveness the behaviour causes the learner or the class.

In all cases of misconduct the Academy reserves the right to use its discretion if an activity is deemed serious to automatically suspend a learner pending a disciplinary hearing.

Minor Examples

(Having 2 or more would be sufficient to escalate to Stage 1 Disciplinary Action)

- Persistent class disruption (verbal or behaviour)
- Consistent lateness (more than 12 late markings)
- Caught sleeping in class more than once
- Speaking or texting on telephone during a class lecture
- Using social networking sites in class time,
- Repeatedly not wearing ID badge,
- Verbal dispute between learners

Urgent Examples

(Having 1 of these would be sufficient to escalate to Stage 1 Disciplinary Action)

- Repeated informal verbal warnings over minor reasons have been ignored
- Excessive absences without prior discussion with tutor (triggers at less than 90% for a quarter, or 5+ total absences for the entire course)
- Undermining tutor in front of class

2. Serious Misconduct

(Sufficient to escalate straight to Stage 2 Disciplinary Action)

- Repeat offence after Stage 1 disciplinary action
- verbally assaulting tutor or learners, including negative, dismissive, and threatening attitude and behaviour towards staff
- Minor vandalism or causing minor damage of College or others' property
- misuse of College pass

3. Gross Misconduct

(Sufficient to escalate straight to Stage 3 Disciplinary Action)

- Repeat offence after Stage 2 disciplinary action
- Outright Theft
- Major vandalism of causing major damage to College or others' property

- Fighting or bullying any learner or member of staff

4. Dangerous Misconduct

(Sufficient to escalate straight to Stage 3 Disciplinary Action, as well as possible Suspension Pending Disciplinary Hearing)

- Repeat offence after Stage 3 disciplinary action
- Aggravated assault of any learner or member of staff
- Bringing a gun or offensive weapon to school
- Illegal drug use
- Drug dealing
- Any activity which would result in a student getting arrested

Suspension Pending Disciplinary Hearing

A learner may only be suspended by the Head of Quality. In cases of dangerous misconduct or persistent gross misconduct, a learner may be suspended immediately pending the disciplinary hearing. A learner must be communicating to both orally and this communication will be confirmed in writing. When a learner under the age of 18, or deemed to be a vulnerable adult, has been suspended, a parent or carer should be informed by telephone, unless this is deemed to put the learner at risk under safeguarding criteria. The maximum a learner can be suspended for is seven lessons.

Please note that if a police investigation is being undertaken it may not be possible to follow the above procedures or timescales.

Informal Disciplinary Procedure

Tutors are expected to manage and deal with minor misbehaviour as part of classroom management strategies. The process to be followed in these cases is:

- Tutor speaks with learner
- Tutor carries out a learner review and sets targets for improved behaviour/attendance

The Formal Disciplinary Process

Stage 1 - Official verbal warning given to learner

Where the misbehaviour has been minor, the learner is reminded of the Academy's Learner Charter and Code of Conduct. If the misbehaviour persists the learner will receive a formal written warning letter.

Stage 2 – Support meeting and written warning

Where a formal written warning letter has been issued and the misbehaviour continues, the learner will be required to attend a meeting with the Learner Support Coordinator. Following the meeting, in most cases the learner will receive a written statement outlining the misbehaviour and the consequences for further misbehaviour. This statement will also contain the length of time the behaviour will be monitored.

Content for Written Warnings

The purpose of these warnings is to show the learner that we are taking the misconduct seriously and show them the consequences of their actions, while giving them fair warning before carrying out more serious disciplinary action.

Contents should include:

- The date and a brief description of the behaviour which led to the contract should be added, including any previous attempts to address the behaviour. If none of these statements are relevant because the seriousness of the behaviour warranted the procedure being invoked urgently or at a higher level, do not use them.
- A warning that further behaviour will lead to escalation.

The warning letter should be signed and dated by both the learner and the tutor upon delivery. One copy should be given to the learner, and another copy will go in the tutor's file for that course cohort.

If the misbehaviour is repeated, further disciplinary action will follow.

Stage 3 – Investigation and Disciplinary Hearing

Where a learner has breached the conditions of Stage 2, and/or has acted in a way that constitutes serious misconduct s/he will be required to attend a disciplinary hearing with the Head of Quality. The Head of Quality will appoint a representative to conduct an investigation into the serious misconduct.

The investigation should include

- Speaking to those involved and taking statements from witnesses
- Speaking to members of staff who recommended the suspension of the learner
- Collating the evidence together in preparation of the meeting

The learner will be informed of the

- Date, time and place of the disciplinary hearing
- Details of the misconduct
- Purpose of the hearing
- Evidence collected as a result of the investigation*
- Right of the learner to be accompanied by a friend or relative**

*The learner must be presented with the evidence prior to the hearing taking place

**The supporting friend or relative should help the learner prepare for the hearing, and ensure the learner understands the procedure. The supporting person must not speak for the learner, but is able to make contributions to the hearing.

The Hearing

Where possible the person investigating the hearing will attend the hearing and begin the procedure by outlining the incident and providing any evidence in support.

The learner will be entitled to speak, stating his or her case and presenting any mitigating factors.

After everything has been heard and no material facts are disputed; and there is no new evidence presented, the Chair will issue a decision either to:

- Permanently exclude the learner
- Suspend the learner for a specific fixed term
- Issue a learner contract
- Take no further action

The learner will receive notice of the decision within seven working days.

Appeal

The learner will have a right to appeal the decision. Notice of appeal must be made in writing within five days and addressed to the Head of Academy. The appeal will be heard within fifteen working days, with the learner receiving at seven working days' notice of the time and place of the appeal interview. The learner will be entitled to be accompanied by a friend or relative. The decision of the appeal will be confirmed in writing to the learner within seven working days.

In the event of a failed appeal, multiple appeals will not be allowed.

Policy Review

This policy will be reviewed in full annually

The policy was last reviewed and agreed by Adam Russell, Head of Quality on 31/07/2018

It is due for review in August 2019.

Overview

The British Academy of Jewellery's (BAJ) reputation and future growth are dependent on the way we manage and protect Personal Data. Protecting the confidentiality and integrity of Personal Data is a key responsibility of everyone within BAJ.

As an organisation that collects, uses and stores Personal Data about its employees, suppliers, students and visitors, BAJ recognises that having controls around the collection, use, retention and destruction of Personal Data is important in order to comply with BAJ's obligations under Data Protection Laws and in particular its obligations under Article 5 of GDPR.

BAJ has implemented this Data Protection Policy to ensure all of our personnel are aware of what they must do to ensure the correct and lawful treatment of Personal Data. This will maintain confidence in BAJ and will provide for a successful working and learning environment for all.

BAJ Personnel will receive a copy of this Policy when they start and may receive periodic revisions of this Policy. This Policy does not form part of any member of BAJ's Personnel's contract of employment and we reserve the right to change this Policy at any time. All members of BAJ are obliged to comply with this Policy at all times.

If you have any queries concerning this Policy, please contact our Data Protection Officer, Laura Watkin who is responsible for ensuring BAJ's compliance with this Policy.

All of our results are shared with our awarding bodies. Please access the C&G, Pearson and SQA (<https://www.sqa.org.uk/sqa/45397.html>)

About this policy

This Policy (and the other policies and documents referred to in it) sets out the basis on which BAJ will collect and use Personal Data either where we collect it from individuals, or where it is provided to BAJ by third parties. It also sets out rules on how BAJ handles uses, transfers and stores Personal Data.

It applies to all Personal Data stored electronically, in paper form, or otherwise.

Definitions

- 1.1. **BAJ** – British Academy of Jewellery, 5 St Cross Street, Hatton Garden, London, EC1N 8UA

1.2. **BAJ Personnel** – Any BAJ employee, worker or contractor who accesses any BAJ Personal Data and will include employees, consultants, contractors, and temporary personnel hired to work on behalf of BAJ.

1.3. **Controller** – Any entity (e.g. company, organisation or person) that makes its own decisions about how it is going to collect and use Personal Data.

A Controller is responsible for compliance with Data Protection Laws. Examples of Personal Data BAJ is the Controller of include employee details or information BAJ collects relating to students. BAJ will be viewed as a Controller of Personal Data if it decides what Personal Data BAJ is going to collect and how it will use it.

A common misconception is that individuals within organizations are the Controllers. This is not the case; it is the organization itself which is the Controller.

1.4. **Data Protection Laws** – The General Data Protection Regulation (Regulation (EU) 2016/679) and all applicable laws relating to the collection and use of Personal Data and privacy and any applicable codes of practice issued by a regulator including in the UK, the Data Protection Act 2018.

1.5. **Data Protection Officer** – Our Data Protection Officer is Laura Watkin, who can be contacted at: 0208 525 9430 ext. 3002, laura@free2learn.org.uk (Laura works on behalf of both BAJ and our sister company free2lean).

1.6. **EEA** – Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden and the UK.

1.7. **ICO** – the Information Commissioner’s Office, the UK’s data protection regulator.

1.8. **Individuals** – Living individuals who can be identified, *directly or indirectly*, from information that BAJ has. For example, an individual could be identified directly by name, or indirectly by gender, job role and office location if you can use this information to work out who they are. Individuals include employees, students, parents, visitors and potential students. Individuals also include partnerships and sole traders.

1.9. **Personal Data** – Any information about an Individual (see definition above) which identifies them or allows them to be identified in conjunction with other information that is held. It includes information of this type, even if used in a business context.

Personal data is defined broadly and covers things such as name, address, email address (including in a business context, email addresses of Individuals in companies such as firstname.surname@organisation.com), IP address and also more sensitive types of data such as trade union membership, genetic data, exam results and religious beliefs. These more sensitive types of data are called “Special Categories of Personal Data” and are defined below. Special Categories of Personal Data are given extra protection by Data Protection Laws.

Personal Data will only be shared with parents or next of kin if the student has signed a contract giving us permission to do so or has processed a written request. We will not give

personal data to anyone without the written permission or request from a student. This includes issues such as giving student performance information to potential employers.

- 1.10. **Processor** – Any entity (e.g. company, organisation or person) which accesses or uses Personal Data on the instruction of a Controller.

A Processor is a third party that processes Personal Data on behalf of a Controller. This is usually as a result of the outsourcing of a service by the Controller or the provision of services by the Processor which involve access to or use of Personal Data. Examples include: where software support for a system, which contains Personal Data, is provided by someone outside the business; cloud arrangements; and mail fulfilment services.

- 1.11. **Special Categories of Personal Data** – Personal Data that reveals a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data (i.e. information about their inherited or acquired genetic characteristics), biometric data (i.e. information about their physical, physiological or behavioural characteristics such as facial images and fingerprints), physical or mental health, sexual life or sexual orientation and criminal record. Special Categories of Personal Data are subject to additional controls in comparison to ordinary Personal Data.

BAJ Personnel's General Obligation

- 1.12. All BAJ Personnel must comply with this policy.
- 1.13. BAJ Personnel must ensure that they keep confidential all Personal Data that they collect, store, use and come into contact with during the performance of their duties.
- 1.14. BAJ Personnel must not release or disclose any Personal Data:
 - 1.14.1. outside BAJ; or
 - 1.14.2. inside BAJ to BAJ Personnel not authorised to access the Personal Data, without specific authorisation from their manager or the Data Protection Officer; this includes by phone calls or in emails.
- 1.15. BAJ Personnel must take all steps to ensure there is no unauthorised access to Personal Data whether by other BAJ Personnel who are not authorised to see such Personal Data or by people outside BAJ.

Data Protection Principles

- 1.16. When using Personal Data, Data Protection Laws require that BAJ complies with the following principles. These principles require Personal Data to be:

- 1.16.1. processed lawfully, fairly and in a transparent manner;
 - 1.16.2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
 - 1.16.3. adequate, relevant and limited to what is necessary for the purposes for which it is being processed;
 - 1.16.4. accurate and kept up to date, meaning that every reasonable step must be taken to ensure that Personal Data that is inaccurate is erased or rectified as soon as possible;
 - 1.16.5. kept for no longer than is necessary for the purposes for which it is being processed; and
 - 1.16.6. processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- 1.17. These principles are considered in more detail in the remainder of this Policy.
- 1.18. In addition to complying with the above requirements BAJ also has to demonstrate in writing that it complies with them. BAJ has a number of policies and procedures in place, including this Policy and the documentation referred to in it, to ensure that BAJ can demonstrate its compliance.

Lawful Use of Personal Data

- 1.19. In order to collect and/or use Personal Data lawfully BAJ needs to be able to show that its use meets one of a number of legal grounds. The detailed grounds can be found on the ICO website <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing>
- 1.20. In addition when collects and/or uses Special Categories of Personal Data, BAJ has to show that one of a number of additional conditions is met. The detailed additional conditions can be found on the ICO website <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/special-category-data>
- 1.21. BAJ has carefully assessed how it uses Personal Data and how it complies with the obligations set out in paragraphs 6.1 and 6.2. If BAJ changes how it uses Personal Data, BAJ needs to update this record and may also need to notify Individuals about the change. If BAJ Personnel therefore intend to change how they use Personal Data at any point they must notify the Data Protection Officer who will decide whether their intended use requires amendments to be made and any other controls which need to apply.

Transparent Processing – Privacy Notices

- 1.22. Where BAJ collects Personal Data directly from Individuals, BAJ will inform them about how BAJ uses their Personal Data. This is in a privacy notice. BAJ has adopted the following privacy notices:
 - Staff
 - Suppliers and Visitors
 - Students
- 1.23. If BAJ receives Personal Data about an Individual from other sources, BAJ will provide the Individual with a privacy notice about how BAJ will use their Personal Data. This will be provided as soon as reasonably possible and in any event within one month.
- 1.24. If BAJ changes how it uses Personal Data, BAJ may need to notify Individuals about the change. If BAJ Personnel therefore intend to change how they use Personal Data please notify the Data Protection Officer who will decide whether the BAJ Personnel's intended use requires amendments to be made to the privacy notices and any other controls which need to apply.

Data Quality – Ensuring The Use Of Accurate, Up to Date and Relevant Personal Data

- 1.25. Data Protection Laws require that BAJ only collects and processes Personal Data to the extent that it is required for the specific purpose(s) notified to the Individual in a privacy notice (see paragraph 7 above) and as set out in BAJ record of how it uses Personal Data. BAJ is also required to ensure that the Personal Data BAJ holds is accurate and kept up to date.
- 1.26. All BAJ Personnel that collect and record Personal Data shall ensure that the Personal Data is recorded accurately, is kept up to date and shall also ensure that they limit the collection and recording of Personal Data to that which is adequate, relevant and limited to what is necessary in relation to the purpose for which it is collected and used.
- 1.27. All BAJ Personnel that obtain Personal Data from sources outside BAJ shall take reasonable steps to ensure that the Personal Data is recorded accurately, is up to date and limited to that which is adequate, relevant and limited to what is necessary in relation to the purpose for which it is collected and used. This does not require BAJ Personnel to independently check the Personal Data obtained.
- 1.28. In order to maintain the quality of Personal Data, all BAJ Personnel that access Personal Data shall ensure that they review, maintain and update it to ensure that it remains accurate, up to date, adequate, relevant and limited to what is necessary in relation to the purpose for which it is collected and used. Please note that this does not apply to Personal Data which BAJ must keep in its original form (e.g. for legal reasons or that which is relevant to an investigation).

- 1.29. BAJ recognises the importance of ensuring that Personal Data is amended, rectified, erased or its use restricted where this is appropriate under Data Protection Laws. BAJ has a Rights of Individuals Policy and a Rights of Individuals Procedure which set out how BAJ responds to requests relating to these issues. Any request from an individual for the amendment, rectification, erasure or restriction of the use of their Personal Data should be dealt with in accordance with those documents.

Personal Data must not be kept for Longer than needed

- 1.30. Data Protection Laws require that BAJ does not keep Personal Data longer than is necessary for the purpose or purposes for which BAJ collected it.
- 1.31. BAJ has assessed the types of Personal Data that it holds and the purposes it uses it for and has set retention periods for the different types of Personal Data processed by BAJ. BAJ securely shreds paper records and securely deletes electronic records of Personal Data at the end of those periods.
- 1.32. If BAJ Personnel feel that a particular item of Personal Data needs to be kept for more or less time than the set retention period for example because there is a requirement of law, or if BAJ Personnel have any questions about this Policy or BAJ's Personal Data retention practices, they should contact the Data Protection Officer for guidance.

Data security

BAJ takes information security very seriously and BAJ has security measures against unlawful or unauthorized processing of Personal Data and against the accidental loss of, or damage to, Personal Data. BAJ has in place procedures and technologies to maintain the security of all Personal Data from the point of collection to the point of destruction.

Data Breach

- 1.33. Whilst BAJ takes information security very seriously, unfortunately, in today's environment, it is possible that a security breach could happen which may result in the unauthorised loss of, access to, deletion of or alteration of Personal Data. If this happens there will be a Personal Data breach and BAJ Personnel must comply with BAJ's Data Breach Notification Policy. Please see paragraphs 11.2 and 11.3 for examples of what can be a Personal Data breach. Please familiarise yourself with it as it contains important obligations which BAJ Personnel need to comply with in the event of Personal Data breaches.
- 1.34. Personal Data breach is defined very broadly and is effectively any failure to keep Personal Data secure, which leads to the accidental or unlawful loss (including loss
- 1.35. of access to), destruction, alteration or unauthorised disclosure of Personal Data. Whilst most Personal Data breaches happen as a result of action taken by a third party, they can also occur as a result of something someone internal does.
- 1.36. There are three main types of Personal Data breach which are as follows:

- 1.36.1. **Confidentiality breach** - where there is an unauthorised or accidental disclosure of, or access to, Personal Data e.g. hacking, accessing internal systems that BAJ Personnel is not authorised to access, accessing Personal Data stored on a lost laptop, phone or other device, people “blagging” access to Personal Data they have no right to access, putting the wrong letter in the wrong envelope, sending an email to the wrong student, or disclosing information over the phone to the wrong person;
- 1.36.2. **Availability breach** - where there is an accidental or unauthorised loss of access to, or destruction of, Personal Data e.g. loss of a memory stick, laptop or device, denial of service attack, infection of systems by ransom ware, deleting Personal Data in error, loss of access to Personal Data stored on systems, inability to restore access to Personal Data from back up, or loss of an encryption key; and
- 1.36.3. **Integrity breach** - where there is an unauthorised or accidental alteration of Personal Data.

Appointing Contractors Who Access BAJ’s Personal Data

- 1.37. If BAJ appoints a contractor who is a Processor of BAJ’s Personal Data, Data Protection Laws require that BAJ only appoints them where BAJ has carried out sufficient due diligence and only where BAJ has appropriate contracts in place.
- 1.38. One requirement of GDPR is that a Controller must only use Processors who meet the requirements of the GDPR and protect the rights of individuals. This means that data protection due diligence should be undertaken on both new and existing suppliers. Once a Processor is appointed they should be audited periodically to ensure that they are meeting the requirements of their contract in relation to Data Protection.
- 1.39. Any contract where an organisation appoints a Processor must be in writing.
- 1.40. You are considered as having appointed a Processor where you engage someone to perform a service for you and as part of it they may get access to your Personal Data. Where you appoint a Processor you, as Controller remain responsible for what happens to the Personal Data.
- 1.41. GDPR requires the contract with a Processor to contain the following obligations as a minimum:
- 1.41.1. to only act on the written instructions of the Controller;
 - 1.41.2. to not export Personal Data without the Controller’s instruction;
 - 1.41.3. to ensure staff are subject to confidentiality obligations;
 - 1.41.4. to take appropriate security measures;
 - 1.41.5. to only engage sub-processors with the prior consent (specific or general) of the Controller and under a written contract;

- 1.41.6. to keep the Personal Data secure and assist the Controller to do so;
 - 1.41.7. to assist with the notification of Data Breaches and Data Protection Impact Assessments;
 - 1.41.8. to assist with subject access/individuals rights;
 - 1.41.9. to delete/return all Personal Data as requested at the end of the contract;
 - 1.41.10. to submit to audits and provide information about the processing; and
 - 1.41.11. to tell the Controller if any instruction is in breach of the GDPR or other EU or member state data protection law.
- 1.42. In addition the contract should set out:
- 1.42.1. The subject-matter and duration of the processing;
 - 1.42.2. the nature and purpose of the processing;
 - 1.42.3. the type of Personal Data and categories of individuals; and
 - 1.42.4. the obligations and rights of the Controller.

Individuals' s Rights

- 1.43. GDPR gives individuals more control about how their data is collected and stored and what is done with it. Some existing rights of individuals have been expanded upon and some new rights have been introduced. It is extremely important that BAJ plans how it will handle these requests under GDPR.
- 1.44. The different types of rights of individuals are reflected in this paragraph.
- 1.45. Subject Access Requests
- 1.45.1. Individuals have the right under the GDPR to ask BAJ to confirm what Personal Data they hold in relation to them and provide them with the data. This is not a new right but additional information has to be provided and the timescale for providing it has been reduced from 40 days to one month (with a possible extension if it is a complex request). In addition, you will no longer be able to charge a fee for complying with the request.
 - 1.45.2. Subject Access Requests are becoming more and more common and are often made in the context of a dispute which means that it is crucial that they are handled appropriately to avoid a complaint being made to the ICO.
- 1.46. Right of Erasure (Right to be Forgotten)
- 1.46.1. This is a limited right for individuals to request the erasure of Personal Data concerning them where:

- 1.46.1.1. the use of the Personal Data is no longer necessary;
- 1.46.1.2. their consent is withdrawn and there is no other legal ground for the processing;
- 1.46.1.3. the individual objects to the processing and there are no overriding legitimate grounds for the processing;
- 1.46.1.4. the Personal Data has been unlawfully processed; and
- 1.46.1.5. the Personal Data has to be erased for compliance with a legal obligation.

1.46.2. In a marketing context, where Personal Data is collected and processed for direct marketing purposes, the individual has a right to object to processing at any time. Where the individual objects, the Personal Data must not be processed for such purposes.

1.47. Right of Data Portability

1.47.1. An individual has the right to request that data concerning them is provided to them in a structured, commonly used and machine readable format where:

- 1.47.1.1. the processing is based on consent or on a contract; and
- 1.47.1.2. the processing is carried out by automated means

1.47.2. This right isn't the same as subject access and is intended to give individuals a subset of their data.

1.48. The Right of Rectification and Restriction

1.48.1. Finally, individuals are also given the right to request that any Personal Data is rectified if inaccurate and to have use of their Personal Data restricted to particular purposes in certain circumstances.

1.49. BAJ will use all Personal Data in accordance with the rights given to Individuals' under Data Protection Laws, and will ensure that it allows Individuals to exercise their rights in accordance with BAJ's Rights of Individuals Policy and Rights of Individuals Procedure. Please familiarise yourself with these documents as they contain important obligations which BAJ Personnel need to comply with in relation to the rights of Individuals over their Personal Data.

Marketing and Consent

1.50. BAJ will sometimes contact Individuals to send them marketing or to promote BAJ. Where BAJ carries out any marketing, Data Protection Laws require that this is only done in a legally compliant manner.

- 1.51. Marketing consists of any advertising or marketing communication that is directed to particular individuals. GDPR will bring about a number of important changes for organisations that market to individuals, including:
 - 1.51.1. providing more detail in their privacy notices, including for example whether profiling takes place; and
 - 1.51.2. rules on obtaining consent will be stricter and will require an individual's "clear affirmative action". The ICO like consent to be used in a marketing context.
- 1.52. BAJ also needs to be aware of the Privacy and Electronic Communications Regulations (PECR) that sit alongside data protection. PECR apply to direct marketing i.e. a communication directed to particular individuals and covers any advertising/marketing material. It applies to electronic communication i.e. calls, emails, texts, faxes. PECR rules apply even if you are not processing any personal data.
- 1.53. Consent is central to electronic marketing. We would recommend that best practice is to provide an un-ticked opt-in box.
- 1.54. Alternatively, BAJ may be able to market using a "soft opt in" if the following conditions were met:
 - 1.54.1. contact details have been obtained in the course of a sale (or negotiations for a sale);
 - 1.54.2. BAJ are marketing its own similar services; and
 - 1.54.3. BAJ gives the individual a simple opportunity to refuse to opt out of the marketing, both when first collecting the details and in every message after that.

AUTOMATED DECISION MAKING AND PROFILING

- 1.55. Under Data Protection Laws there are controls around profiling and automated decision making in relation to Individuals.

Automated Decision Making happens where BAJ makes a decision about an Individual solely by automated means without any human involvement and the decision has legal or other significant effects; and

Profiling happens where BAJ automatically uses Personal Data to evaluate certain things about an Individual.
- 1.56. Any Automated Decision Making or Profiling which BAJ carries out can only be done once we are confident that it is complying with Data Protection Laws. If BAJ Personnel therefore wish to carry out any Automated Decision Making or Profiling Free2Learn Personnel must inform the Data Protection Officer.
- 1.57. BAJ Personnel must not carry out Automated Decision Making or Profiling without the approval of the Data Protection Officer.
- 1.58. BAJ does not carry out Automated Decision Making or Profiling in relation to its employees.

Data Protection Impact Assessments (DPIA)

- 1.59. The GDPR introduce a new requirement to carry out a risk assessment in relation to the use of Personal Data for a new service, product or process. This must be done prior to the processing via a Data Protection Impact Assessment (“**DPIA**”). A DPIA should be started as early as practical in the design of processing operations. A DPIA is not a prohibition on using Personal Data but is an assessment of issues affecting Personal Data which need to be considered before a new product/service/process is rolled out. The process is designed to:
 - 1.59.1. describe the collection and use of Personal Data;
 - 1.59.2. assess its necessity and its proportionality in relation to the purposes;
 - 1.59.3. assess the risks to the rights and freedoms of individuals; and
 - 1.59.4. the measures to address the risks.
- 1.60. A DPIA must be completed where the use of Personal Data is likely to result in a high risk to the rights and freedoms of individuals. The ICO’s standard DPIA template is available from www.ico.org.uk.
- 1.61. Where a DPIA reveals risks which are not appropriately mitigated the ICO must be consulted.
- 1.62. Where BAJ is launching or proposing to adopt a new process, product or service which involves Personal Data, Free2Learn needs to consider whether it needs to carry out a DPIA as part of the project initiation process. BAJ needs to carry out a DPIA at an early stage in the process so that Free2Learn can identify and fix problems with its proposed new process, product or service at an early stage, reducing the associated costs and damage to reputation, which might otherwise occur.
- 1.63. Situations where BAJ may have to carry out a Data Protection Impact Assessment include the following (please note that this list is not exhaustive):
 - 1.63.1. large scale and systematic use of Personal Data for the purposes of Automated Decision Making or Profiling (see definitions above) where legal or similarly significant decisions are made;
 - 1.63.2. large scale use of Special Categories of Personal Data, or Personal Data relating to criminal convictions and offences e.g. the use of high volumes of health data; or
 - 1.63.3. systematic monitoring of public areas on a large scale e.g. CCTV cameras.
- 1.64. All DPIAs must be reviewed and approved by the Data Protection Officer.

Transferring Personal Data to a Country Outside the EEA

- 1.65. Data Protection Laws impose strict controls on Personal Data being transferred outside the EEA. Transfer includes sending Personal Data outside the EEA but also includes storage of

Personal Data or access to it outside the EEA. It needs to be thought about whenever BAJ appoints a supplier outside the EEA or BAJ appoints a supplier with group companies outside the EEA which may give access to the Personal Data to staff outside the EEA.

- 1.66. So that BAJ can ensure it is compliant with Data Protection Laws BAJ Personnel must not export Personal Data unless it has been approved by the Data Protection Officer.
- 1.67. BAJ Personnel must not export any Personal Data outside the EEA without the approval of the Data Protection Officer.