

Policy Review

This policy will be reviewed in full annually
The policy was last reviewed and agreed by
It is due for review in August 2018

Signature: *M. Houghton* Date: 4/9/17
Head of Quality

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 the Academy.

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 during the recruitment process.

BAJ 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	Holts Academy of Jewellery Ltd
Bank Name	Barclays
Account Number	10856584
Sort Code	20-37-75
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 Student Finance England (SFE). Student Finance England is a Student 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 Customer Service and Recruitment 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 Customer Services 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 the Academy 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 Student Loan Company (SLC) will be notified and you will be contacted directly by the SLC to discuss repayment of the loan.

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Signature: *M. Waight* Date: *4/9/17*
Head of Quality

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:

- 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.

1. 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.

2. 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. If he/she prefers, one of the following designated people may be contacted as an alternative:

- Sofie Boons Head of Quality
- Michele Longhurst Head of Quality

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

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?

The staff member receiving 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.

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.

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 escalated to the Head of Business Product Development who will invoke the disciplinary procedure to ensure that the accused person has every opportunity to defend or explain his/her actions.

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.

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.

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.

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.

3. 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.

4. 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.

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Head of Quality

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?

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 aim to respond to complaints within 20 working days. 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?

We will:

- send an email to let you know that we've received it [as long as you've provided a valid email address]
- 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]

What to do if you're not satisfied

If you are not satisfied with the outcome, you can appeal to the Head of Business and Product Development.

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):

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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.

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

The Academy 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.