

## Policies and Procedures 2024/25

### Table of Contents

1. Assessment Policy .....	2
2. Refund and Cancellation Policy – information for course applicants .....	3
3. Complaints and Appeals Policy .....	4
4. Conflicts of Interest Policy .....	7
5. Data Protection Policy .....	9
6. Disciplinary Policy .....	23
7. Grievance Procedure .....	27
8. Equal Opportunities Policy .....	31
9. Prevent Radicalisation and Extremism.....	36
10. Health and Safety Policy .....	38
11. Food Policy.....	40
12. Information Technology Systems Acceptable Use Policy .....	41
13. Internal Quality Assurance Policy .....	43
14. Learner Admissions and Recruitment Policy .....	44
15. Malpractice and Maladministration Policy .....	46
16. Migrant Learner Sponsorship Policy.....	48
17. Non-Harassment Policy .....	49
18. Plagiarism policy (including AI).....	50
19. Reasonable Adjustments and Special Considerations Policy.....	50
20. Recruitment and Selection Policy .....	53
21. Redundancy Policy .....	55
22. Reference Policy .....	57
23. Registration and Certification Policy.....	59
24. Smoking, Alcohol and Drugs Policy .....	60
25. Energy Management Policy .....	61
26. Continuing Professional Development (CPD) Policy.....	62
27. Emerson College Safeguarding Policy and Procedure .....	64

**NAMED PERSON RESPONSIBLE FOR UPDATING POLICIES AND PROCEDURES:**

**C CARONES, HEAD OF EDUCATION**

**J SHAKLES, HEAD OF OPERATIONS**

**D MOONCIE, CEO**

## 1. Assessment Policy

Assessment Policy Aim:

- to ensure that assessment methodology is valid, reliable and does not disadvantage or advantage any group of learners or individuals.
- to ensure that the assessment procedure is open, fair and free from bias and to national standards.
- to ensure that there is accurate and detailed recording of assessment decisions.

In order to do this, the College will:

- ensure that learners are provided with assignments that are fit for purpose, to enable them to produce appropriate evidence for assessment.
- assess learners' evidence using only the published assessment and grading criteria.
- ensure that assessment decisions are impartial, valid and reliable.
- recognise that extensions can be agreed in certain circumstances. See "reasonable adjustments", Point 19.
- develop assessment procedures that will minimise the opportunity for malpractice.
- maintain accurate and detailed records of assessment decisions.
- maintain a robust and rigorous internal verification procedure.
- provide samples for external verification, as required by the awarding organisation.
- monitor EQA reports and undertake any remedial action required.
- share good assessment practice between all programme teams.
- ensure that assessment methodology and the role of the assessor are understood by all staff.
- provide resources to ensure that assessment can be performed accurately and appropriately.

This policy will be reviewed every year by the Head of Education and CEO.

## 2. Refund and Cancellation Policy – information for course applicants

A) If you cancel the course booking within 14 calendar days of receiving your acceptance confirmation, any payment made will be refunded in full, up until two months prior to the start of the course; thereafter there are no refunds. Special consideration will be given in cases of illness confirmed by medical evidence.

See point C if you apply within 14 days of course start.

Cancellations received after the 14-day cancellation period and earlier than two months before the start date of the course will receive a refund of any fees paid minus the Deposit. Thereafter there are no refunds.

There are no refunds for missed days or modules.

You must make your cancellation in writing.

B) *Short courses* -- If you cancel the course booking within 14 calendar days of receiving your acceptance confirmation or confirmation of booking, any payment made will be refunded in full, up until two months prior to the start of the course; thereafter there are no refunds.

Special consideration will be given in cases of illness confirmed by medical evidence.

Cancellations received after the 14-day cancellation period and earlier than two months before the start date of the course will receive a refund of any fees paid minus 15% of full fees. Thereafter there are no refunds.

There are no refunds for missed days or modules.

You must make your cancellation in writing.

C) If you apply within 14 days of course start, any cancellation within 14 days of acceptance confirmation (provided that there has been no attendance or access to resources) will be entitled to a full refund, in line with Consumer Protection Legislation.

D) If you have had a payment plan agreed by the course registrar, the above cancellation policy applies.

Should you leave prior to the end of the course, you agree to pay the balance of the full fees immediately.

Refunds for meals and accommodation -- After your course has started, we require four weeks' notice in writing to change your booking for accommodation and meals. Refunds will be made for the following term/s. No refunds are available for shorter courses once they have started. Please refer to the Registrar.

If you cancel within 14 days of application submission any payment made will be refunded in full. If the course has started within this 14-day notice period, you may be liable for those days attended. You must make your cancellation in writing.

### 3. Complaints and Appeals Policy

#### Introduction

Emerson College has comprehensive quality assurance procedures. In the event that these systems fail, a complaint or appeal may be made by a learner, a tutor, a staff or their representative.

The aim is to:

- enable to enquire, question or appeal against an assessment decision.
- attempt to reach agreement at the earliest opportunity.
- standardise and record any appeal to ensure openness and fairness.
- facilitate ultimate right of appeal to the awarding organisation, where appropriate.
- protect the interests of all and the integrity of the qualification.

In order to do this, the College will:

- inform the Appeals Policy at induction.
- record, track and validate any appeal.
- For qualifications and programmes awarded by Crossfields Institute, forward the appeal to the Crossfields Institute if the complaint has not been resolved after the internal appeals process has been exhausted.
- For qualifications and programmes awarded by Crossfields Institute, keep appeals records for inspection by Crossfields Institute for a minimum of 18 months.
- have a staged appeals procedure.
- take appropriate action to protect the interests of others and the integrity of the qualification, when the outcome of an appeal questions the validity of other results.
- monitor appeals to inform quality improvement.

For an appeal about assessment decisions for qualifications and programmes awarded by Crossfields Institute, refer to “Enquiry on Results Policy and Procedures”, Crossfields Institute.

[Enquiry-on-Results-Policy-and-Procedure-Aug-20.pdf \(crossfieldsinstitute.com\)](#)

#### Complaints and Appeals Procedure

##### Complaints

When there is a complaint or grievance about any matter, academic or non-academic, you are encouraged to raise the matter at an early stage with an appropriate member of staff. If the matter is not resolved at this stage, you may take the matter to the Head of Education and CEO. There is a right of appeal against the outcome of the complaints process.

- You are encouraged to approach the person/people in question for an informal discussion.
- If needed you are recommended to write a letter stating the problem.
- The letter will be discussed at an appropriate meeting and a written response will be sent back to you within 20 working days of receiving the complaint.

##### Appeals

An appeal is a formal request by a learner, a tutor or a staff that Emerson College undertake an investigation and arrive at a decision.

If you are dissatisfied with the outcome of your complaint and you think that you have grounds, you can make a formal appeal. To make a formal appeal you should write to the Head of Education and CEO within 28 days of the date of the response to your complaint.

You should explain the grounds for your appeal and attach any information or correspondence that you consider relevant. Emerson College will send an acknowledgement of your appeal within three working days of receiving it and tell you who has been asked to consider your appeal. Assessment outcome appeals will investigate the procedures followed and will not include a review of learner’s work. The learner’s documentation will be retained during the Appeal procedure.

The person who is asked to consider your appeal will look at:

- Whether there are grounds for upholding your appeal
- Whether the decision was taken fairly and correctly in accordance with the College's policy and procedures
- Whether all the appropriate information was taken into account

### **Rights and responsibilities**

Emerson College will:

- Make sure that all the points you raise are properly and impartially considered, and that there is no potential conflict of interest
- Explain the outcome clearly, and ensure that you know what further steps are open to you
- Allow a friend to accompany you to any appeal meeting
- Respect confidentiality by disclosing only the information that is necessary to consider and respond to your appeal, and only to staff who need it for those purposes

Emerson College may rule that there are no grounds for the appeal to be considered, and you will then be advised accordingly. Once your appeal has been considered you will be sent a reply directly from the person who has considered your case.

For qualifications and programmes awarded by Crossfields Institutes, following the outcome of your appeal, if you remain dissatisfied you can ask the partnering Awarding organisation, Crossfields Institute, to review your case.

### **Students may refer to the following as guidance in the circumstance of a dismissal from the College:**

The Head of Education and CEO will inform that student of the dismissal as soon as possible. Typically, the student will be allowed to appeal that dismissal to the Head of Education and CEO of the college. Once a student has been dismissed from the college, the student may not remain in Residence Hall.

See full policy on our web site: [www.emerson.org.uk](http://www.emerson.org.uk)

### **Informal complaints procedure**

- Students should initially try to discuss the matter directly with their Course Leader or appropriate member of staff
- If this is not satisfactory, students may take it to another Course Leader or appropriate member of staff
- Students may put the complaint in writing and submit it to the Head of Education and CEO
- 

If the informal procedures above have been thoroughly pursued with no resolution, a request can be put in writing to one of the Course Leaders to arrange to bring the grievance to the Complaints Committee. The complainant should outline the nature of the problem and the procedures taken so far in the letter. See below for the college guide on the formal complaints procedure.

### **Formal complaints procedure**

- The complainant shall outline the nature of the problem and the procedures taken so far and put it into letter form.
- A meeting of the Complaints Committee will then be convened
- The Complaints Committee will consist of the CEO, the relevant faculty chair, Course Leader, Student, an advocate for the student approved by all parties who may be internal or external to Emerson College, a secretary to take minutes.
- After the meeting, a letter from the Complaints Committee will be sent within two weeks to the complainant outlining the outcome and/or resolution. The outcome of this meeting is binding to all parties, subject to appeal.

Emerson College is accredited by the British Accreditation Council. For a copy of their Complaints Procedure, see [www.the-bac.org/bac-complaints-procedure/](http://www.the-bac.org/bac-complaints-procedure/)

This policy will be reviewed every year by the Head of Education and CEO.

#### **4. Conflicts of Interest Policy**

##### **Definition of a Conflict of Interest**

Conflict of interest exists in relation to Emerson College where:

- its interests in any activity undertaken by it, on its behalf, or by a member of its staff have the potential to lead it to act contrary to its interests in the delivery and award of programmes and qualifications. For qualifications and programmes awarded by Crossfields Institute, this is in accordance with the requirements of the awarding organisation (Crossfields Institute),
- a person who is connected to the delivery or award of programmes and qualifications at Emerson College has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that delivery or award and impact on our compliance with the requirements of the awarding organisation,
- an informed and reasonable observer would conclude that either of these situations was the case.

##### **Overview**

As an organisation that keeps all aspects of its business under review, individual teams are expected to identify and inform the Head of Education and CEO of any actual/potential conflicts of interest that could impact Emerson College and which are not already defined.

In addition, managers are required to manage and monitor any identified conflicts of interest that relate to their area. Should the status of any identified conflict, or the associated controls change, then the manager should inform the Head of Education and CEO so they can update, as required.

Overall Emerson College compliance with regard to identifying and managing any conflicts of interest will be reviewed regularly by the Head of Education and CEO.

##### **Conflict of Interest Principles**

In implementing Emerson College's approach to identifying and managing actual/potential conflicts of interest, staff are required to abide by the following principles:

- All managers and staff must commit to identifying and managing all actual/potential conflicts of interest that may affect Emerson College and in doing so raise possible conflicts of interest with the Head of Education and CEO if in doubt.
- Staff must be proactive in the identification and management of conflicts of interest that may affect Emerson College's effectiveness, level of regulatory compliance and/or reputation.
- Staff must be open about the nature of any potential/actual conflicts of interest and not try to hide or present them in a better light.
- Managing conflicts of interest is about preventing issues from occurring that may impact on Emerson College's operational effectiveness and/or regulatory compliance and must identify and deal with conflicts of interest sooner rather than later.
- Controls to managing any potential conflicts of interest must be proportionate to the risks associated with the identified conflict(s).

##### **Dealing with Conflicts of Interests and/or Breaches to the Procedures**

Should the manager and/or the Head of Education and CEO believe there has been a breach of this policy, or unforeseen conflicts of interest emerge, the Head of Education and CEO must be informed, and an investigation carried out immediately along with a review of the associated procedures.

Should an external party feel there has been an actual conflict of interest involving Emerson College then they should raise the matter with the Head of Education and CEO who will begin an investigation unless they have an involvement/interest in the allegation in which case it will be passed to an alternative member of staff, or an external party will be appointed to carry out the review and the outcomes reported to the Board of Trustees. At all times Emerson College will ensure that personnel assigned to the investigation have the appropriate level of training and competence and they have had no previous involvement or personal interest in the matter.

If the breach is also classified as an Adverse Effect then the Head of Education and CEO must promptly inform the awarding organisation. In so doing, they will inform the awarding organisation of the reasonable steps that we have taken or intend to take to prevent, correct or mitigate the Adverse Effect, including details of any reviews to be carried out. For information, our definition of an Adverse Effect is:

An act, omission, event, incident, or circumstance has an Adverse Effect if it -

- (A) gives rise to prejudice to Learners or potential Learners, or
- (B) adversely affects -
  - (i) the ability of Emerson College to undertake the delivery or award of programmes or qualifications in accordance with its approval by the awarding organisation,
  - (ii) the standards of programmes and qualifications which Emerson College makes available or proposes to make available, or
  - (iii) public confidence in programmes and qualifications.

#### **Contact**

If you have any queries about the contents of the policy, please contact the Head of Education and CEO.

#### **Review arrangements**

We will review this document annually as part of our self-evaluation arrangements. However, a review will be commissioned earlier should an issue arise in relation to an actual or potential conflict of interest and/or in response to customer, learner or regulatory feedback.

This policy will be reviewed every year by the Head of Education and CEO.



## 5. Data Protection Policy

### Emerson College - Privacy Policy

‘Emerson College’ is part of the Emerson College Trust Ltd, registered charity number 312101.

This Privacy Policy together with the Cookies Policy sets out the basis on which we collect, hold and process personal information (‘Personal Data’).

Emerson College is committed to protecting the privacy and the human dignity of all our web and campus users (including learners, tutors, staff and contractors). As a company processing your personal data, we are regulated by the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018).

This page is intended to keep you informed about what we do with the personal data we collect, hold and process. ‘Personal data’, for the purposes of the GDPR and the DPA 2018, means any information from which you can be identified; it includes things like your name, date of birth, e-mail address, home address, billing address, telephone number and IP address.

While we will endeavour to tell you if we make significant changes to this Policy, we reserve the right to change our Privacy Policy at any time without prior notice. We therefore recommend that you check this Privacy Notice regularly to understand how we use your information.

If you still have questions about anything in our Privacy Notice, please contact Ellie Kidson (Communications Manager) at [publicity@emerson.org.uk](mailto:publicity@emerson.org.uk).

### WHAT INFORMATION WE COLLECT

The kind of information that Emerson College collects, holds and processes may include:

**Identity Data** may include your first name, last name, username, title, date of birth and gender and passport information (where applicable); where this has been shared with us as part of an application, booking, contract, invoice or user survey.

**Contact Data** may include your billing address, delivery address, email address and telephone numbers.

**Financial Data** may include your bank account and payment card details.

**Transaction Data** may include details about payments between us and other details of purchases made by you.

**Technical Data** may include your internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access the Emerson Website.

**Learner Data** may include attendance records, progress reports, marks and certificates.

**Staff/ Volunteer Data** may include performance reviews, sickness and annual leave.

**Supplier Data** may include key contact information, performance reviews and contract information.

**Profile Data** may include your preferences, feedback and survey responses.

**Usage Data** may include information about how you use our website, products and services.

**Marketing and Communications Data** may include your preferences in receiving marketing communications from us and your communication preferences.

#### **Sensitive Data**

Occasionally we process special category or 'Sensitive Data', for example, health and additional support related information (Article 9 GDPR). This data is collected by Emerson College in support of requests for Reasonable Adjustments or Special Considerations and processed by our college registrar.

'Sensitive Data' refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions and information about your health.

Depending on the purpose, we may require your explicit consent for processing sensitive data, if so we will send you a further communication asking for you to confirm your consent to this processing.

#### **WHY WE COLLECT, HOLD & PROCESS YOUR PERSONAL INFORMATION**

As a Higher Education Institution, Emerson College collects data for processing on a lawful basis. We will only use your personal data when legally permitted.

The lawful bases for processing are set out in Article 6 of the GDPR. At least one of these must apply for us to lawfully process your personal data:

- (a) Consent:** the individual has given clear consent for us to process their personal data for a specific purpose.
- (b) Contract:** the processing is necessary for a contract we have with the individual, or because they have asked us to take specific steps before entering into a contract.
- (c) Legal obligation:** the processing is necessary for us to comply with the law (not including contractual obligations).
- (d) Vital interests:** the processing is necessary to protect someone's life.
- (e) Public task:** the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
- (f) Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Then most common legal grounds on which we rely to use your information are:

- (a) Consent**
- (b) Contract**
- (c) Legal Obligation**
- (f) Legitimate Interests**

Set out in the table on the following page is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data.

Type of User	Type of Data	Purpose/ activity	Lawful Basis For Processing
Students (Learners)	Identity	Enrolment  To process learner applications, take payment and register learners.	Consent
	Contact		Contract
	Financial		Legal Obligation
	Transaction		Legitimate Interests
Students (Learners)	Contact	Education  To manage our relationship with learners.  To verify learner assessment evidence as part of the quality assurance process.  To issue certificates for qualifications.	Consent
	Learner Data		Contract  Legitimate Interests
Students and Event Goers	Contact	Event Bookings  To process course and event bookings through our MEWs & Events 500 event booking system.  To process meal and accommodation bookings through our MEWs & Events 500 event booking system.	Contract
	Financial		Legal Obligation
	Transaction		Legitimate Interests
	Profile		
Venue Hire Clients	Contact	Venue Hire Bookings  To process Venue Hire bookings and payments.	Contract
	Financial		Legal Obligation
	Transaction		Legitimate Interests
	Profile		
Students, Event Goers and Venue Hire Clients	Contact	Feedback  To assess the quality of our services using user surveys and feedback forms.	Consent
	Profile		Legal Obligation
	Marketing & Communications		Legitimate Interests
Students, Event Goers, Venue Hire Clients, Alumni, Community Members, Staff, Donors	Contact	Marketing & Communication  To keep consenting users subscribed to our database regularly updated on relevant news, courses and events.	Consent
	Profile		Legitimate Interests
	Marketing & Communications		

<b>Staff &amp; Volunteers</b>	<b>Identity</b>  <b>Contact</b>  <b>Staff/Volunteer</b>	<b>Recruitment &amp; HR</b>  To process job applications for new staff and volunteers.  To conduct staff appraisals.  To ensure the College retains up-to-date contact information for staff and volunteers.	<b>Contract</b>  <b>Legal Obligation</b>  <b>Legitimate Interests</b>
<b>Staff</b>	<b>Identity</b>  <b>Contact</b>  <b>Financial</b>  <b>Transaction</b>	<b>Payroll</b>  To process staff payments.	<b>Contract</b>  <b>Legal Obligation</b>  <b>Legitimate Interests</b>
<b>Donors</b>	<b>Identity</b>  <b>Contact</b>  <b>Financial</b>  <b>Transaction</b>	<b>Fundraising</b>  To process donor contributions.	<b>Contract</b>  <b>Legal Obligation</b>  <b>Legitimate Interests</b>
<b>Suppliers</b>	<b>Identity</b>  <b>Contact</b>  <b>Supplier</b>	<b>Procurement</b>  To manage supplier contracts	<b>Contract</b>  <b>Legitimate Interests</b>
<b>Students, Event Goers, Venue Hire Clients, Staff, Donors, Third Parties, Suppliers</b>	<b>Identity</b>  <b>Contact</b>  <b>Financial</b>  <b>Transaction</b>	<b>Accounting &amp; Auditing</b>  To maintain necessary records for accounting and auditing purposes to comply with financial auditing and college auditing bodies	<b>Contract</b>  <b>Legal Obligation</b>  <b>Legitimate Interests</b>
<b>Association Members</b>	<b>Contact</b>	<b>Communication</b>  To keep members informed.	<b>Contract</b>  <b>Legitimate Interests</b>
<b>Students, Event Goers, Venue Hire Clients, Staff, Living &amp; Learning Community Members</b>	<b>Special Category Data</b>	To meet the health and wellbeing needs of a particular user.	<b>Contract</b>  <b>Legal Obligation</b>
<b>Students, Event Goers, Venue Hire Clients, Staff,</b>	<b>Criminal data</b>	To meet the wellbeing needs of a particular user.	<b>Contract</b>  <b>Legal Obligation</b>

Living & Learning Community Members			
--	--	--	--

**COOKIES POLICY**

**Emerson College - Cookies Policy**

Our website uses cookies to improve your online experience. By using our website, you agree that this Cookies Policy applies to that use.

**WHAT IS A COOKIE?**

Cookies are text files which are placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to complete statistical reports on website activity.

There are different types of cookies:

**SESSION COOKIES**

Session cookies last for the duration of your visit and are deleted when you close your browser. They allow a website to identify that a user is navigating from page to page, supporting website security or basic functionality. They contain no personal information that can be used to identify an individual.

**PERSISTENT COOKIES**

Persistent cookies last after you have closed your browser and allow a website to remember your actions and preferences. This also allows a website to keep you signed in if you select this option on the sign-in form.

**FIRST- AND THIRD-PARTY COOKIES**

Whether a cookie is a first- or third-party cookie depends on which website the cookie comes from. First-party cookies are those set by or on behalf of the website visited. All other cookies are third-party cookies.

Below is a full list of the cookies used by Emerson College along with a description of what they are used for:

Cookie Name	Cookie Purpose	Cookie Type
Universal Analytics (Google)  _ga  Read Googles overview of privacy and safeguarding data:  <a href="https://support.google.com/analytics/answer/6004245">https://support.google.com/analytics/answer/6004245</a>	This cookie is used to distinguish unique users by assigning a randomly generated number as a client identifier. It is included in each page request in a site and used to calculate visitor, session and campaign data for the sites analytics reports. By default it is set to expire after 2 years, although this is customisable by website owners.	Persistent

<p>Universal Analytics (Google)</p> <p>_gid</p> <p>Read Googles overview of privacy and safeguarding data: <a href="https://support.google.com/analytics/answer/6004245">https://support.google.com/analytics/answer/6004245</a></p>	<p>This cookie is used to distinguish users. By default it is set to expire after 24 hours.</p>	<p>Session</p>
<p>DYNSRV</p>	<p>This cookie is an essential cookie used for load balancing to manage server traffic demand.</p>	<p>First Party</p>

**MARKETING COMMUNICATION**

We may communicate with you (via email) to keep you updated about our news, upcoming courses, workshops, events and retreats, venue hire services, subject specific course information and fundraising activities only where you have provided your explicit consent for us to do so.

If you register to be sent information about our campus, community, news and courses we will ask you for some personal information (name and email address) in order to provide you with the service you are requesting. You may opt out of receiving any, or all, of these communications from us at any time by following the unsubscribe link or instructions provided in any email we send.

**HOW WE COLLECT YOUR PERSONAL INFORMATION**

We collect data about you through a variety of different methods including:

**Direct interactions:** You may provide data by filling in forms on our site (or otherwise) or by communicating with us by post, phone, email or otherwise, including when you:

- book or apply for our products or services;
- subscribe to our service or newsletters;
- request resources or marketing be sent to you;
- give us feedback.

**Automated technologies or interactions:** As you use our website, we may automatically collect Technical Data about your equipment, browsing actions and usage patterns. We collect this data by using cookies, server logs and similar technologies.

Please see our [cookie policy](#) for further details.

**Third parties or publicly available sources:** We may receive personal data about you from various third parties and public sources as set out below:

Technical Data from the following parties:

- analytics providers such as Google based outside the EU;
- advertising networks such as Facebook based outside the EU; and
- search information providers such as Google based outside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services such as PayPal, based inside and outside the EU.

#### **DISCLOSURE OF PERSONAL DATA AND YOUR RIGHTS**

We may have to share your personal data with the parties set out below.

- **Third parties** who provide fulfilment, marketing and customer support services, such as IT support services, email marketing services, marketing automation platforms, social media platforms and Google Ad services and membership service providers.
- **Partners and course leaders** to fulfil our obligations under such any contract entered into by you.
- **Service providers** who provide IT and system administration services, in order to identify or resolve technical problems arising from the use of the website or to assist with the payment process.
- **Professional advisers** including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services for the purposes of investigating any actual or suspected criminal activity, enforcing our rights or other regulatory or legal matters.
- **HM Revenue & Customs, regulators and other authorities** based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions. We will not share your details with any other third parties unless we have your explicit consent.

However, if we reasonably believe that we are required by law to disclose your personal information to a third party, whether in compliance with any applicable law or regulation or by court order or in connection with legal proceedings, we may do so.

#### **TRANSFER OF DATA FROM REGISTERED LEARNERS OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)**

We have a number of registered learners outside the UK. Countries within the European Union have the same GDPR requirements and data protection safeguards as the UK. We may collect and process individual data from countries which do not have equivalent data protection legislation (e.g. the United States of America, Russia, Japan, China and India). We collect, process and transfer data from all centres, learners and individuals in the way that is set out in this notice regardless of the country of origin.

We will only collect, process or transfer data to and from a third country if the Information Commissioners Office ([www.ico.org.uk](http://www.ico.org.uk)) has determined that there are adequate levels of data protection legislated for that country, or we have been assured of adequate safeguards by the relevant centre or organisation.

#### **TRANSFER OF DATA TO AND FROM THIRD PARTIES OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)**

Some of our third-party service providers are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we do our best to ensure a similar degree of security of data by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission; or
- Where we use certain service providers, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe; or
- Where we use providers based in the United States, we may transfer data to them if they are part of the EU-US Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

#### **LINKS TO OTHER SITES**

Our site contains links to other sites that are not under our control. Such other sites do not necessarily follow our privacy policies, and may place their own cookies on your computer. This practice is standard on the Internet. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies.

#### **STORAGE AND RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Please see Appendix 1 below for Retention periods of data



## YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

You can exercise these rights by emailing us at [publicity@emerson.org.uk](mailto:publicity@emerson.org.uk)

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## SECURITY OF PRIVATE INFORMATION

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

However, we cannot absolutely guarantee the security of your personal data.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## CONTACTING THE ICO

If you are not happy with any aspect of how we collect and use your data, please let us know so we can try and resolve it for you. Should this not be resolved, you have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

---

Emerson College, Hartfield Road, Forest Row, Sussex RH18 5JX

Tel +44 1342 822238

Email: [publicity@emerson.org.uk](mailto:publicity@emerson.org.uk)

Website: [www.emerson.org.uk](http://www.emerson.org.uk)

Proprietors: The Emerson College Trust

Registered in London No. 908985; Registered Charity No. 312101

Emerson College is accredited by the British Accreditation Council

[www.emerson.org.uk](http://www.emerson.org.uk)

#### **APPENDIX 1 - RETENTION OF PERSONAL DATA BY EMERSON COLLEGE**

Emerson College is required to retain personal data for a variety of purposes. We will not retain data for any longer than is required by a legitimate purpose.

The table below sets out the data that we retain, for how long and why.

Type of User	Type of Data	Purpose/ activity	Retention Period	Criteria to determine the retention period
--------------	--------------	-------------------	------------------	--

<p><b>Students (Learners)</b></p>	<p><b>Contact</b> <b>Identity</b> <b>Learner Data</b> <b>Financial</b> <b>Transaction</b></p>	<p><b>Enrolment</b> To process learner applications, take payment and register learners.</p> <p><b>Education</b> To manage our relationship with learners.</p> <p>To verify learner assessment evidence as part of the quality assurance process.</p> <p>To issue certificates for qualifications.</p>	<p><b>Contact</b> Retained indefinitely, unless requested to remove.</p> <p><b>Identity &amp; Financial Data</b> Student application forms and application information is retained for the duration of the course and then securely destroyed.</p> <p><b>Learner Data</b> Retained until learner has qualified and assessment information has been audited by Crossfields Institute and is then securely destroyed unless otherwise requested.</p> <p><b>Transactional Data</b> Is retained for up to 6 years.</p>	<p><b>Contact</b> We retain this data in case there is a need for a learner/employer/education provider to request confirmation of certification or replacement certificates.</p> <p><b>Identity &amp; Financial Data</b> This provides information that we may need to access to make specific arrangements for learners.</p> <p><b>Learner Data</b> This evidence is primarily held and shared with Crossfields Institute. It is retained until all quality assurance procedures have been satisfactorily completed.</p> <p><b>Transactional Data</b> Records held for auditing purposes and in order to be able to respond to HMRC requests.</p>
<p><b>Students and Event Goers</b></p>	<p><b>Contact</b> <b>Financial</b> <b>Transaction</b> <b>Profile</b></p>	<p><b>Event Bookings</b> To process course and event bookings through our MEWs &amp; Events 500 event booking system.</p> <p>To process meal and accommodation bookings through our MEWs &amp; Events 500 event booking system.</p>	<p><b>Contact &amp; Profile Data</b> Retained indefinitely, unless requested to remove.</p> <p><b>Financial Data</b> Is used for processing but is not retained.</p> <p><b>Transactional Data</b> Is retained for up to 6 years.</p>	<p><b>Contact &amp; Profile Data</b> We retain this data, unless requested otherwise in order to effectively deal with repeat customers, to determine the success of our services and to monitor the effectiveness of our booking and sales processes.</p> <p><b>Financial Data</b> Is used for processing but is not retained.</p> <p><b>Transactional Data</b> Records held for auditing purposes and in order to be able to respond to HMRC requests.</p>

<p><b>Venue Hire Clients</b></p>	<p><b>Contact Financial Transaction Profile</b></p>	<p><b>Venue Hire Bookings</b> To process Venue Hire bookings and payments.</p>	<p><b>Contact &amp; Profile Data</b> Retained indefinitely, unless requested to remove.</p> <p><b>Financial Data</b> Is used for processing but is not retained.</p> <p><b>Transactional Data</b> Is retained for up to 6 years.</p>	<p><b>Contact &amp; Profile Data</b> We retain this data, unless requested otherwise in order to effectively deal with repeat customers, to determine the success of our services and to monitor the effectiveness of our booking and sales processes.</p> <p><b>Financial Data</b> Is used for processing but is not retained.</p> <p><b>Transactional Data</b> Records held for auditing purposes and in order to be able to respond to HMRC requests.</p>
<p><b>Students, Event Goers and Venue Hire Clients</b></p>	<p><b>Contact Profile Marketing &amp; Communications</b></p>	<p><b>Feedback</b> To assess the quality of our services using user surveys and feedback forms.</p>	<p><b>Contact, Profile &amp; Marketing &amp; Communications Data</b> Retained indefinitely, unless requested to remove.</p>	<p><b>Contact, Profile &amp; Marketing &amp; Communications Data</b> Consent is required to obtain feedback. Contact data is not mandatory so people are given the option of supplying feedback anonymously.</p>
<p><b>Students, Event Goers, Venue Hire Clients, Alumni, Community Members, Staff, Donors, Association Members</b></p>	<p><b>Contact Profile Marketing &amp; Communications</b></p>	<p><b>Marketing &amp; Communication</b> To keep consenting users subscribed to our database regularly updated on relevant news, courses and events.</p>	<p><b>Contact, Profile &amp; Marketing &amp; Communications Data</b> Retained indefinitely, unless requested to remove.</p>	<p><b>Contact, Profile &amp; Marketing &amp; Communications Data</b> Consent is required to join and members retain the option to unsubscribe at any time.</p>

<p><b>Applicants, Staff &amp; Volunteers</b></p>	<p><b>Identity</b> <b>Contact</b> <b>Staff/Volunteer</b> <b>Financial</b> <b>Transaction</b></p>	<p><b>Recruitment &amp; HR</b> To process job applications for new staff and volunteers  To conduct staff appraisals.  To ensure the College retains up-to-date contact information for staff and volunteers.  <b>Payroll</b> To process staff payments.</p>	<p><b>Applicants</b> Retained for 6 weeks after applications close  <b>Staff</b> Retained up to 7 years from the end of employment or contract.  <b>Volunteers</b> Retained for the duration of their volunteering period</p>	<p><b>Applicants</b> We retain applications for a short period of time, and may ask to retain them for longer if an applicant wishes to be contacted in relation to future employment opportunities.  <b>Staff</b> Records held in order to be able to respond meaningfully to employment reference requests or to respond to HMRC requests.  <b>Volunteers</b> We retain volunteer information for the duration of their volunteering period, and may ask to retain them for longer if a volunteer wishes to be contacted in relation to future volunteering or employment opportunities.</p>
<p><b>Donors</b></p>	<p><b>Identity</b> <b>Contact</b> <b>Financial</b> <b>Transaction</b></p>	<p><b>Fundraising</b> To process donor contributions.</p>	<p>Retained for up to 6 years.</p>	<p>Records held in order to be able to respond meaningfully to employment reference requests or to respond to HMRC requests.</p>
<p><b>Suppliers</b></p>	<p><b>Identity</b> <b>Contact</b> <b>Supplier</b></p>	<p><b>Procurement</b> To manage supplier contracts</p>	<p>Retained for up to 6 years.</p>	<p>Records held in order to be able to respond meaningfully to employment reference requests or to respond to HMRC requests.</p>
<p><b>Students, Event Goers, Venue Hire Clients, Staff, Donors, Third Parties, Suppliers, Living &amp; Learning Community Members</b></p>	<p><b>Identity</b> <b>Contact</b> <b>Financial</b> <b>Transaction</b></p>	<p><b>Accounting &amp; Auditing</b> To maintain necessary records for accounting and auditing purposes to comply with financial auditing and college auditing bodies</p>	<p>Retained for up to 6 years.</p>	<p>Records held in order to be able to respond meaningfully to employment reference requests or to respond to HMRC requests.</p>
<p><b>Association Members</b></p>	<p><b>Contact</b></p>	<p><b>Communication</b> To keep members informed.</p>	<p>For the duration of their membership</p>	<p>Data is held in order to be able to coordinate Association Meetings and to disseminate Association Meeting information.</p>

<p><b>Students, Event Goers, Venue Hire Clients, Staff, Living &amp; Learning Community Members</b></p>	<p><b>Special Category Data</b></p>	<p>To meet the health and wellbeing needs of a particular user.</p>	<p>The shortest possible time; context dependent.</p>	<p>We will retain this data in relation to special consideration applications for students for as long as needed to make a decision.</p> <p>We will retain this in relation to employees for as long as needed to ensure that their health and wellbeing needs at work are met.</p>
<p><b>Students, Event Goers, Venue Hire Clients, Staff, Living &amp; Learning Community Members</b></p>	<p><b>Criminal data</b></p>	<p>To meet the wellbeing needs of a particular user.</p>	<p>The shortest possible time; context dependent.</p>	<p>We will retain this data for as short as possible a time, due to its sensitive nature.</p>

## 6. Disciplinary Policy

All organisations need a minimum number of rules and procedures in order to protect the interests of both the employer and the employee and also the interests of others who come into contact with our organisation.

The rules that we have set out specify standards of performance and behaviour and the procedures referred to in this section are intended to promote consistency and fairness. The purpose of our rules and procedures is to emphasise and encourage improvement in conduct and performance and is not necessarily to be construed as punitive action. Accordingly, every effort is made to ensure that when action is taken under the disciplinary procedure, such action is fair and reasonable, that you are given every opportunity to present your case, and that there is a right of appeal against any disciplinary decision which is considered to be either unfair or unjust.

The following rules and procedures that are set out are intended to ensure:

- that disciplinary action when taken is taken quickly, fairly and in a uniform and consistent manner;
- that you will only be subjected to disciplinary action once there has been a full investigation of all of the facts and you have had an opportunity to present your side of the case. If you are disciplined, you will receive a clear explanation of both the decision reached and any penalty imposed and of the right to appeal against the decision and/or penalty.

### **Disciplinary rules and categories of conduct**

It is not practical to set out all the instances of conduct or performance which may lead to disciplinary action. However, the disciplinary procedure may be invoked as a result of:

- any failure to observe the rules set out in this Handbook or in any other part of your Contract of Employment/Principal Statement of Terms and Conditions of Service.
- any other instance of conduct or performance, which we believe could only properly be dealt with under the disciplinary procedure.

It is impossible to produce an exhaustive list of all instances of misconduct or performance giving rise to disciplinary action and it is also impractical to state which category of discipline will be applied to any given degree of behaviour or performance. Other than for a probationary termination, or a Gross Misconduct issue, it is unlikely that dismissal would be the first course of action taken. However, conduct or performance which proves to be unacceptable will fall into one of the undernoted four categories.

- Unsatisfactory Conduct
- Misconduct
- Serious Misconduct
- Gross Misconduct

### **Informal Counselling**

Where a breach of conduct or performance is not regarded as being particularly serious and is shown to have been caused by issues of capability, competence or behaviour of an employee, we may deal with this matter informally in the first instance and give an opportunity for improvement, if necessary with training, rather than revert to the formal disciplinary procedure. Any decision to proceed in this way however is a matter for our discretion and will depend entirely on the circumstances of each case.

### **Unsatisfactory Conduct**

Any minor breach of the rules and regulations will fall into the category of unsatisfactory conduct. If it is considered sufficiently serious to warrant disciplinary action then it is likely that if this is the first instance of such a minor misdemeanour the disciplinary consequence will be a verbal warning. In dealing with unsatisfactory conduct it is the

standard of conduct or indeed performance which is being considered and not necessarily a repetition of an earlier misdemeanour.

## **Misconduct**

Disciplinary action may be taken where there is continued repetition of action which has resulted in a previous verbal warning for unsatisfactory conduct and there has been no improvement or there has been continued breach. It may well be however that the misconduct in question is sufficiently serious to warrant an immediate written warning without there having been a previous verbal warning issued.

## **Serious Misconduct**

Serious misconduct or a serious shortfall in performance may in themselves require a final written warning to be issued irrespective of whether previous warnings have been given. A first and final written warning may be issued where it is considered that conduct or performance is not sufficiently serious to warrant dismissal but nevertheless is considerably more serious than the action which would normally have warranted a written warning for misconduct.

There may be occasions when an employee has received a combination of either verbal and/or written warnings in respect of their conduct or performance and there has still been no marked improvement or there has been repetition of the action for which the previous warnings have been given. Consequently, the next disciplinary punishment will usually be a final written warning for serious misconduct.

Please note that following the issue of a final written warning any further repetition or further breach in relation to conduct or performance will usually result in dismissal with contractual notice, after a disciplinary hearing.

## **Gross Misconduct**

Certain aspects of behaviour, conduct and performance, will be construed as gross misconduct meaning conduct which is particularly serious in itself or in its consequences. In such cases it is considered inappropriate to allow you to continue at work and the appropriate penalty would be summary dismissal after a disciplinary hearing with the forfeiture of any right to notice of termination, or payment in lieu of notice.

We reserve the right to deal with every case entirely on its merits and undertake that we will always seek to conduct the disciplinary procedure reasonably, fairly and consistently.

Examples of acts of gross misconduct:

Staff members are liable to summary dismissal (i.e. without notice) following a disciplinary hearing, if they are considered to have acted in any of the following ways: (Please note this is not an exhaustive list)

- deliberate or serious breaches of conduct standards/rules and regulations
- theft of money, or property, whether belonging to the business, a fellow employee, or a third party associated with the business
- any action which can be construed as intent to defraud/deceive
- being under the influence of intoxicants, drugs, or other substances
- fighting, or physical assault, or abusive/threatening behaviour
- grossly indecent, or immoral behaviour
- wilful refusal to carry out a legitimate management instruction
- deliberate or serious breach(es) of the Health and Safety rules
- carrying out private work on the premises and/or in working hours, without express permission
  
- deliberate damage, destruction or sabotage, of our property, or any property belonging to a fellow employee, or a third party associated with the business
- discriminatory conduct or harassment



- deliberate, or serious, breach(es) of computer/software/e-mail/internet, rules and procedures
- falsification of records
- a criminal or unlawful act which affects work
- failure to disclose an ailment which might affect your employment with Emerson
- breach of confidentiality with regard to customer data and commercially sensitive information
- any offence, action or omission so serious as to give justification, whether specified above or otherwise

### **Disciplinary investigations and hearings**

When a matter arises which we consider can be properly dealt with on an informal basis this would be our preferred approach. This is particularly the case where a matter relating to your abilities arises and which we believe can be resolved by discussion, training or counselling. However, if there is no improvement after a suitable period of time has been allowed or training undertaken, the matter may have to be dealt with more formally.

In the event of a matter arising where it is considered necessary to invoke the disciplinary procedure, we will first seek to establish the true facts of the case and this will be done before memories and recollections fade. Other employees who may be involved in this investigation will be required to cooperate fully with the procedure.

On certain occasions it may be considered prudent or necessary to suspend you with pay pending the conclusion of any investigation and subsequent hearing. Further clauses within this section will indicate the level of authority vested in management levels within the business. It must be noted that suspension with pay is not in itself disciplinary action; it is only seen as a temporary measure intended to assist in the proper conduct of the disciplinary process, and is not a pre-judgement of that process.

If, following initial investigation it is considered that there is a case to answer then a disciplinary hearing will be established as soon as possible. It should be noted that at that hearing you may be accompanied by a fellow employee of your own choice, or a Trade Union Official. No other companion will be allowed to attend.

The nature of the disciplinary matter will be explained to you in as much detail as is possible and you will have every opportunity to present your case in full, to call any witnesses you would feel appropriate and to present any written evidence. If you require further time to prepare your case, we may postpone the hearing until a later date but normally only one adjournment will be granted. If your version of events so requires we will undertake such further investigations as may be considered appropriate in order to establish the credibility of your explanation and the result of these investigations will be put to you before any final decision is made.

At the conclusion of the hearing if you accept that the matters raised against you are correct, or if a decision is made against you, then before any penalty is imposed, we will give you an opportunity to put forward any mitigating circumstances you feel may be relevant.

At that time there may be a verbal explanation of the decision and this will always be confirmed in writing to you. You will also be notified of your right of appeal against either the findings and/or the penalty to be imposed.

### **Disciplinary action**

Dismissal: Contractual dismissal for misconduct will result in the termination of employment with notice. Dismissal for gross misconduct offences will result in summary termination without notice.

Demotion: In addition to any formal disciplinary action which is deemed appropriate (other than dismissal), we reserve the right to consider your demotion if your conduct or capability has given us reason to believe that you are unsuitable to remain in your present position.

### **Suspension without Pay**

In circumstances where we feel we have sufficient grounds to warrant dismissal, then mitigating circumstances taken into account may cause us to step back from deciding to dismiss and an alternative to dismissal could well be suspension without pay for a period not exceeding five days. In such circumstances this disciplinary action could be

coupled with, for example, a final written warning but full details will be made known to you either at the conclusion of the disciplinary hearing, or as soon as possible thereafter.

## **Warnings**

All warnings, including verbal warnings, will be confirmed in writing and will be sent to you and recorded on your file and will contain details of all matters raised during the disciplinary hearing, a summary of all interviews and your explanations and the final conclusions reached.

Warnings for matters connected with capability or performance will indicate a period of time for improvement and may contain certain recommendations for further training or counselling. Warnings for conduct may require that there is either immediate improvement and/or that there is no repetition of the offence.

Any further disciplinary process which takes place after a previous warning is likely to result in a more serious penalty being imposed, even if the second offence is of a different nature to the previous one, particularly where there is evidence that the first warning has not been heeded.

Warnings will include confirmation of your right of appeal.

## **Disciplinary action during probationary periods**

During the probationary period, Emerson reserves the right to modify the stages of the disciplinary procedure, whilst ensuring compliance with current legislation.

## **Duration of Warnings**

### Verbal Warnings

A verbal warning will be disregarded after a 6-month period

### Written Warnings

A written warning will normally be disregarded after a 12-month period

### Final Written Warnings

A final written warning will normally be disregarded after a 12-month period.

We reserve the right to increase the above periods if the offence committed is particularly serious or if it is an offence which might be repeated periodically.

## **Disciplinary Authority**

A line manager or trustee are authorised to take disciplinary action.

## **Disciplinary appeals procedure**

At the end of a disciplinary hearing, you will be informed in writing of your right of appeal, including the name of the person to whom your appeal should be made.

If you decide to appeal, you must give written Notice of Appeal to the nominated person. The notice must be received within 7 calendar days from the day on which you received the written confirmation of the disciplinary hearing decision.

The Notice of Appeal must state whether you are appealing against the conduct of the disciplinary hearing, its finding, the penalties imposed, or a combination of these factors and the supporting reasons for your appeal.

Our aim in providing an appeal system is to ensure that you have the facility for a complete re-appraisal of the facts and procedures and to reconsider the soundness of the earlier decision.

The Appeal Hearing will be conducted by a person who has previously not been involved in the disciplinary process, so that the original disciplinary hearing can be examined to establish whether the hearing was a full and thorough airing and examination of all the facts/evidence, proper procedures were observed, the findings were fair and reasonable and the penalty imposed properly reflected the gravity of the offence and any mitigating factors were fully considered.

The format of an Appeal Hearing will be an opportunity for you to present your supporting reasons as to why you believe the disciplinary action taken is either unfair, or too harsh. You may submit any appropriate evidence and call any appropriate witness on your behalf.

At an Appeal Hearing you are again entitled to be accompanied by a work colleague of your choice. Legal representation will not be allowed.

The findings, decision and outcome of the Appeal Hearing, will be confirmed to you in writing.

## **7. Grievance Procedure**

We know that problems and tensions can arise between people at work and that if such issues are not dealt with and resolved quickly, they may well get worse rather than better.

Employees should aim to resolve most grievances informally by speaking to the person concerned or the CEO, explaining clearly what the concern or problem is.

If employees do not feel able to approach the person concerned or the CEO, they should talk the matter through with:

- 
- a member of the Board of trustees

If an employee is not sure who to talk to, they can contact the Chair of trustees for advice.

The CEO and employees have a responsibility to try and resolve workplace disputes and problems promptly, aiming to avoid disruption, through discussion and by seeking to understand the views and perspective of others.

The CEO will take concerns raised by employees seriously, act promptly and seek to resolve the matter informally, where this is possible.

Raising a complaint or being subject to a complaint can be an upsetting experience. Everyone involved can expect to be treated calmly and with respect. No employee will suffer detriment for raising a formal grievance in good faith, or for assisting a colleague to do so.

However, if an employee is found to have used this procedure frivolously, maliciously or excessively without legitimate grounds, disciplinary action may be considered.

Where attempts to resolve matters informally have been exhausted by the employee, or circumstances make this route inappropriate, this formal procedure can be followed.

This procedure follows the steps recommended by the ACAS Statutory Code of Practice on Discipline & Grievance. It has been designed to ensure complaints from employees are dealt with promptly and in a fair and consistent manner.

### Definition of grievance

Grievances are “concerns, problems or complaints that employees raise with their employers” (ACAS). Grievances can be about terms and conditions of employment; working conditions; working relations; discrimination; statutory employment rights and working practices (this list is not exhaustive).

### Raising a Formal Grievance

You must set out the facts of your complaint in writing in a letter. This written statement will form the basis of the grievance meeting and any investigations, so it is important that you:

- set out the nature of your complaint clearly
- provide details such as dates and times of events
- give the names of any witnesses
- include supporting evidence
- explain how you believe the matter could be resolved

The letter must be sent to the CEO.

You will receive confirmation that your grievance has been received and you will be given the name of the person who will be responsible for dealing with it.

### Formal Grievance Meeting

A meeting will be arranged for you to attend, without unreasonable delay and usually within 10 working days of receiving the grievance.

You can make a request to be accompanied to this meeting by a work colleague or friend.

The meeting will be run by the CEO. The aim of this meeting is for the CEO to establish a detailed understanding of the issues and if possible, decide how to resolve the problem.

You will be asked to explain the grievance and how you think it could be resolved. It is important that you use this opportunity to make sure all the issues are raised and any supporting evidence is provided, along with the names of any witnesses. No new complaints can be added after this meeting unless agreement is given by the CEO. Notes of the meeting will be taken and circulated to attendees. The CEO may arrange for a separate note-taker to attend. The CEO may decide that s/he needs to gather more information before reaching a decision and will adjourn the meeting to allow an investigation to take place. This is particularly likely if the complaint is against another person, who will need to be given the opportunity to provide a response. The nominated Director will write to you within three working days, following this meeting, confirming the actions agreed.

Where it is possible for the CEO to come to a decision about the grievance at this first meeting, s/he will do so and decide what actions to take and where possible give that decision as part of the meeting. The CEO will then confirm the outcome in writing to you within three working days of the meeting.

You will have the right of appeal should you believe the outcome is unacceptable (See paragraph Appeal).

### Investigation

Where more information is needed and an investigation is necessary, this will be carried out either by the CEO or may appoint an investigating officer. You will be told who this will be.

Investigations will be conducted fairly and without delay. In normal circumstances the investigation will be completed within a period of four working weeks, depending on the scale and complexity of the issues. If there are unavoidable delays, you will be kept informed.

You are required to attend investigation meetings when requested to do so.

#### Reconvened Formal Grievance Meeting

When the investigation is complete and the CEO is satisfied s/he has all the information, another meeting will be arranged for you to attend, normally within 10 working days.

Again, you can be accompanied by a work colleague or friend.

The CEO will feed back the findings from the investigation and provide her conclusion and decision. The CEO will confirm the outcome in writing to you within three working days of the meeting. You will have the right of appeal should you believe the outcome is unacceptable.

Where the issues are complex and there are opposing accounts of events a grievance hearing may be arranged, for all parties and witnesses to attend, if the CEO believes this will help him/her reach a conclusion.

In circumstances where the CEO has conducted an extensive investigation, they may decide to refer the case to a governor to ask them to chair a hearing, examine all the evidence and make a decision. The CEO will normally provide a written report for this hearing and will attend to provide information about the investigation.

If a hearing is arranged, you will have the opportunity to invite any witness/es to support your case and you will need to let the nominated Director have the names of any witnesses you intend to call. The person who your complaint is about may also invite witnesses to attend.

Having considered all the evidence and heard from all parties, the Chair of the hearing will make a decision about your grievance and write to you, normally within three working days, confirming their decision and any actions they intend to take. You will have the right of appeal should you believe the outcome is unacceptable.

Regardless of the outcome, all parties are expected to work together in a positive and professional manner.

#### Appeal

If you believe that your grievance has not been satisfactorily resolved, based on the evidence and the fair application of this procedure, you have the right to appeal within five working days of receiving the written outcome.

In accordance with the ACAS statutory Code of Practice your appeal must be made in writing and you must make clear the grounds for your appeal, for example, faults in the procedure followed, new evidence not originally available, a perverse decision. No new complaints can be raised at the appeal.

The appeal will be heard by a panel made up of three members of the relevant body. The appeal hearing will be arranged without unreasonable delay and usually within 10 working days of receiving the appeal. This will normally take the form of a hearing where you will have the opportunity to explain the grounds of your appeal and the nominated Director or, where a grievance hearing has been held, the Chair of the hearing will respond to it. In some circumstances the panel may instead choose to deal with the matter by written submissions after consultation and agreement with both parties.

The outcome of the appeal will be communicated to you in writing within three working days of the decision.

This is the final stage of the formal grievance procedure

This procedure will be reviewed from time to time by the CEO.

Lay off procedure

If due to a temporary shortage of work, it becomes necessary to place you either on short time or lay off without pay, such action will be taken in accordance with current employment legislation. We will in such circumstances apply the statutory guarantee payments as appropriate.

As much notice as is reasonably practical will be given for any of the above situations.

This policy will be reviewed every year by the CEO.

## 8. Equal Opportunities Policy

### 1. Definitions

1.1 Direct discrimination occurs when a person is treated less favourably than another simply because of a personal characteristic.

1.2 Associative discrimination. This is direct discrimination against someone because they associate with another person who possesses a protected characteristic.

1.3 Perceptive discrimination 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.

1.4 Indirect discrimination occurs when a policy or requirement, which at first glance seems fair, in fact operates to the detriment of a particular group of people because of a characteristic of that group and the requirement is not reasonable or necessary in the circumstances.

1.5 Harassment is unwanted “conduct related to a relevant protected characteristic, which has the purpose of violating an individual’s dignity or creating an intimidating hostile, degrading, humiliating or offensive environment for that individual”.

1.6 Victimisation occurs when someone has been treated unfairly for complaining or helping others to complain about an incidence of discrimination. For comprehensive list of definitions see appendix

### 2. Policy Principles

This policy is intended to enable Emerson to promote an environment in which equality can be developed and embedded in our practice and applies to all users of Emerson’s facilities.

2.1 Emerson is committed to enabling all learners and staff to achieve their potential and will not tolerate discrimination on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, culture, ethnicity, national origin, social origin, financial status, HIV status, language, political beliefs, trade union membership, or unrelated criminal convictions.

2.2 We will promote equality of opportunity for staff & learners.

2.3 Our policy will be reflected in curriculum design and delivery, teaching and learning activities, information, advice and guidance, staffing, staff development and the interaction between staff, clients, learners and the general public.

2.4 Emerson will take all reasonable steps to seek to ensure that those who provide services to or visit the College are aware of and observe the equal opportunities policy of the College. It is the responsibility of the relevant internal contractor or host to ensure that providers/visitors behave appropriately towards all members of the College and that no discrimination takes place.

### 3. Implementation - Principles into practice

This section of the policy sets out our commitment to equal opportunities and what we hope to achieve.

#### 3.1 Teaching and Learning

- Curriculum design that takes full account of access and inclusive learning strategies, progress and progression routes and acknowledges prior learning and experience.
- Resource materials which are free from or used to challenge discriminatory attitudes and practice.
- Mutually respectful tutor-learner relationships characterised by negotiation and partnership.
- Identification of individual learning and support needs through effective initial assessment and subsequent differentiated learning.

- Learner induction in which principles of equality of opportunity are clearly explained. Learners need to know what they should do if they encounter discrimination, harassment or victimisation. They should understand the complaints and appeal procedures and be fully aware of what constitutes unacceptable behaviour and the consequences of that behaviour.

### 3.2 Support

- Appropriate response to the individual support needs of learners

### 3.4 Use of Feedback

- Clear and effective procedures for seeking and responding to feedback from learners, clients and staff.

### 3.5 Complaints and Concerns

- Clear and well-understood procedures for making and dealing with complaints
- Complaints and other concerns are dealt with promptly and effectively
- Monitoring and analysis of complaints and effective action taken to address common issues

Emerson Head of Education and CEO are responsible for monitoring feedback and complaints and, if necessary, reviewing Policies & Procedures.

### 3.6 Staff Recruitment, Selection, Induction and Professional Development & Training

Emerson will ensure that:

- Employment, promotion and development opportunities are advertised locally or nationally, as appropriate, and all job opportunities will be outlined through clear and transparent job descriptions and person specifications.
- All recruitment and selection processes are free from bias and discriminatory practice.
- All staff employed by Emerson College will receive an induction programme which enhances their potential for success within the job in question.
- All staff are aware of their entitlement to Continuous Professional Development to support them with their current job and to enable them to progress both within and outside Emerson. Where training is deemed essential, staff will either be released from duties or if attending in their own time, provided with an attendance allowance.

All staff will be made aware of their responsibility for implementing the College's Equal Opportunities Policy and that they have a legal and moral obligation not to discriminate and to report incidents of discrimination against any individual or group of individuals. Following investigation, any member of staff found to be discriminating will face disciplinary proceedings.

### 3.7 Information, Advice and Guidance

- All users can expect a friendly, professional and confidential service provided by trained staff.
- Information and general publicity materials which contain inclusive imagery in relation to diversity.

### 3.8 Accommodation and Equipment

- Access for people with mobility difficulties.



- Personal Emergency Evacuation Plans (PEEPs) will be in place prior to course start for learners who need them; PEEPs will also be in place for staff with disabilities.

#### 4. Monitoring, Evaluation and Review

- Equal Opportunities will be a regular agenda item on Management meetings.
- Monitoring will be the responsibility of the Head of Operations and CEO.
- The policy will be reviewed annually by the Head of Operations
- 
- and CEO. Any recommendations for change will be passed to the Directors for approval.

#### 5. Dissemination

A copy of the policy will be provided for all new employees in their staff induction pack. An electronic version will be available on a read-only basis on the Emerson Website.

### EQUAL OPPORTUNITIES POLICY APPENDIX 1

#### EQUAL OPPORTUNITIES DEFINITIONS

Equal Opportunities – The means by which disadvantage and discrimination is reduced and eliminated by legislation and positive action. Equal Opportunities aims to ensure that no group receives less favourable treatment by virtue of one's skin colour, race, gender, ethnic origin, disability, age, class or sexuality, thereby enabling all people to have equality of access to the provision of goods, services, facilities, premises and employment. It does not mean treating everyone the same.

Racism - All attitudes, procedures and patterns – economic, social and cultural – with the effect, though not necessarily conscious intention, of creating, maintaining and extending the power, influence and privilege of one group of people over another. Racism is prejudice and/or discrimination based on the myth of race. Racists believe that some groups are born superior to others, and in the name of protecting their race from “contamination”, they justify the domination and destruction of races they consider to be inferior to their own. Racism can be personal or institutional. Personal racism occurs when a person's skin colour is the basis for how others perceive him or her. Institutional racism is racial prejudice or discrimination supported by power and authority used to the advantage of one race over others, as with differential treatment by police or security guards.

Racialism – An implicit set of negative beliefs about a racial or ethnic group that can result in offensive or violent behaviour towards members of a racial or ethnic group.

Sexism - All attitudes, procedures and patterns – economic, social and cultural – with the effect though not necessarily conscious intention, of creating, maintaining and extending the power, influence and privilege of one group of people over another.

**Prejudice** - Prejudice means pre-judging individuals or groups, either favourably or unfavourably, without knowing the full facts. Unfavourable prejudices are negative reasons that we form, for no reason, and they usually come out of ignorance. Discrimination involves acting on prejudice. It is the actions based on prejudice that are unlawful not the prejudice itself (however undesirable it may be). Prejudicial thinking is based on stereotypes. Prejudice is an attitude.

**Stereotype** - A stereotype is an oversimplified generalisation about a person or group of people without regard for individual differences. Even positive stereotypes, such as, 'Asians are good at maths and computers', have a negative impact.

**Discrimination** - Discrimination is basically about making choices. It implies neither fairness nor unfairness. Unfair discrimination can happen in a whole host of ways based on appearance, accent, sexuality, disability, sex, religion etc. Unlawful discrimination on the other hand, is a sub-set of unfair discrimination and involves negative actions towards others based on sex, race and disability as well as religion in Northern Ireland.

**Associative discrimination.** This is direct discrimination against someone because they associate with another person who possesses a protected characteristic.

**Perceptive discrimination** 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

Discrimination is the behaviour of action that can follow prejudicial thinking. Discrimination is the denial of justice or fair treatment in many arenas including employment, housing and political rights. In essence it is less favourable treatment of an individual or group which is not based on their work performance or conduct as a member of staff or learner.

**Direct Discrimination** – This is where people are treated worse or less well than others because of their race, ethnicity, or sex. Direct discrimination can take many forms. These could include racist remarks, and differences in expectations, provision and treatment. Segregation on racial and sexual grounds also constitutes direct discrimination.

**Example of direct discrimination:** if an Asian woman is turned down for a job as a shop assistant and told there are no vacancies then a white woman with equivalent qualifications is offered the job a short while later, the Asian woman has been directly discriminated against.

**Indirect Discrimination** - This is a more complex concept. Indirect discrimination occurs when a condition or requirement is applied equally to everyone but affects some groups adversely or disproportionately and where the condition/requirement cannot be justified. Indirect discrimination is not necessarily intentional. The case below taken from John Pritchard's 'Guide to the Law' illustrates indirect discrimination: The headmaster of a private school would not allow a Sikh boy to attend unless he removed his turban and cut his hair, since turbans and long hair were against the school rules. These rules amounted to indirect discrimination against Sikhs. In addition, the House of Lords held that Sikhs did make up an 'ethnic' group – the Race Relations Act did not just protect those of a particular race, but extended to groups with a definite cultural tradition, such as Sikhs. Thus the school rules had to be changed.

Mandela (1983) If an employer requires job applicants to have a qualification in a particular subject, but will only consider people whose degree is from a British university, this condition could amount to indirect discrimination.

Positive Discrimination - This is often referred to as preferential treatment. It specifies actions which treat one person more favourably for no reason other than they are female, black etc. Positive discrimination is a form of direct discrimination in favour of an individual and is unlawful. Exception: positive discrimination is not unlawful under the Disability Discrimination Act.

Positive Action - Positive action is not intended to be a policy of placing people in jobs or educational institutions because they are women or members of various minority groups. Positive action serves to encourage the previously disadvantaged to the starting gate for jobs, promotions and other opportunities. But once at the starting gate the race should be on equal terms between all competitors.

When particular groups are under-represented in a working or training environment, the law allows you to positively encourage applications from members of those groups to help them compete equally with the majority group.

Positive action seeks to redress past disadvantages and enables people to take full and equal advantage of opportunities in jobs, education and training. It is also a means of addressing skills deficits within the workplace.

Racial Discrimination - Less favourable treatment of an individual or group on account of their racial origin or colour.

Sex Discrimination - Less favourable treatment of an individual or group on account of their gender or marital status.

Harassment – Can be directed at any group or individual, and can include unnecessary touching, unwanted physical contact, leering, personal remarks, verbal or written abuse, visual displays, coercion, isolation or non-co-operation.

Sexual Harassment - Unwanted conduct of a sexual nature or other conduct based on sex affecting the dignity of men and women at work (European Community Code of Practice). Repeated and/or unwanted verbal or sexual advances, sexually explicit or derogatory statements or sexually discriminatory remarks (TUC).

Racial Harassment - Conduct (whether by act or omission) which is intended to cause or does cause physical or mental distress to an individual or group on account of their colour, race, nationality or ethnic origins.

Third-party harassment - occurs where an employee is harassed and the harassment is related to a protected characteristic (other than marriage and civil partnership and pregnancy and maternity) by third parties such as clients or customers.

Victimisation - occurs when someone has been treated unfairly for complaining or helping others to complain about an incidence of discrimination.

The Equality Act 2010 has informed the revision of Emerson College's Equal Opportunities Policy.

The Equality Act 2010 replaces the existing anti-discrimination laws with a single Act. The primary purpose of the Act is to consolidate the complicated and numerous arrays of Acts and Regulations, which formed the basis of anti-discrimination law in Great Britain. This was, primarily, the Equal Pay Act 1970, the Sex Discrimination Act 1975, the Race Relations Act 1976, the Disability Discrimination Act 1995 and three major statutory instruments protecting discrimination in employment on grounds of religion or belief, sexual orientation and age. The legislation requires equal treatment in access to employment as well as private and public services, regardless of the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex, and sexual orientation. In the case of gender, there are special protections for pregnant women and in the case of disability, employers and service providers are under a duty to make reasonable adjustments to their workplaces to overcome barriers experienced by disabled people. In this regard, the Equality Act 2010 did not change the law.

This Policy will be reviewed every year by the Head of Operations and CEO

## **9. Prevent Radicalisation and Extremism**

### **General Statement**

In 2010 the Government published the Prevent Strategy, a national programme to stop people becoming terrorists or supporting terrorism. In 2012 Channel, a key element of Prevent, produced a guide for Local Partnerships protecting vulnerable people from being drawn into terrorism. In recent years there has been an awareness of the specific need to safeguard children, young people and in general everybody from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

### **Our Aim**

Emerson College values freedom of speech and the expansion of beliefs / ideology as fundamental rights underpinning our society's values. Both students and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

Emerson College as a training provider has a responsibility to ensure:

- We have undertaken training in the Prevent Duty as identified by their leaders and managers
- We are all aware of when it is appropriate to refer concerns about learners or colleagues to the Designated Safeguarding Officer
- To exemplify British values of "democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs" into our practice.

### **Scope**

This policy relates to all staff and learners.

### **Staff Training**

All staff are trained on the Chanel Process and how the duty engages with requirements of their role, via distance and certificated learning. Identifying risk at an early stage allows early intervention and is crucial to the Prevent duty and Chanel process being successful.

### **Learner Safety, Engagement and Curriculum**

The duty encompasses building learner resilience to the threat of radicalisation, challenging extremism and raising awareness of and demonstrating British values:

- Democracy
- Rule of Law
- Tolerance and understanding of different faiths
- Challenging discrimination
- Individual liberty

Opportunities to promote all of the above values are currently facilitated within the Curriculum of the Courses.

### **Definition**

Emerson College seeks to protect learners and staff against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

### **Risk**

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make young people and adults vulnerable to future manipulation and exploitation.

Emerson College is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

### **Risk Reduction**

The Senior Management Team and the College Prevent Lead has assessed the level of risk within the College and has put actions in place to reduce that risk.

### **College Prevent Lead and contacts**

When a member of staff has any concerns that a student or another member of staff may be at risk of radicalisation or involvement in terrorism, they should speak with the College Prevent Lead Officer. The lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism is the Designated Safeguarding Officer: Damian Mooncie

She is the first Single Point of Contact.

Email: [damian.mooncie@emerson.org.uk](mailto:damian.mooncie@emerson.org.uk)

Phone : 01342 822238

Once the Designated Safeguarding officer has been informed, he/she will make a decision on whether the issue needs to be escalated to the local police Prevent Officer. The designated safeguarding staff member that is involved with the referral will then support the Channel process as seen fit by the local Channel panel. It should be noted that referral to the channel process is not a criminal intervention.

### **Additional contacts include the following:**

To report illegal information, pictures or videos found on the internet log on to [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism).

To report concerns, call the East Sussex Police Anti-Terrorist Hotline number: 0800 789 321

*NB: If a crime is being committed or there is a threat to someone's life call 999 immediately.*

### **Interventions**

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

### **Indicators of vulnerability to radicalisation**

- a. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
- b. Extremism is defined by the Government in the Prevent Strategy as:
  - i. 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.

- ii. We also include in our definition of extremism calls for the death of any individuals, whether in this country or overseas.
- c. Extremism is defined by the Crown Prosecution Service as:  
The demonstration of unacceptable behaviour by using any means or medium to express views which:
  - i. Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
  - ii. Seek to provoke others to terrorist acts;
  - iii. Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
  - iv. Foster hatred which might lead to inter-community violence in the UK.

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

People may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that staff are able to recognise those vulnerabilities.

**Indicators of vulnerability include:**

- a. Identity Crisis – the person is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- b. Personal Crisis – the person may be experiencing family tensions; a sense of isolation and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- c. Personal Circumstances – migration; local community tensions; and events affecting the person’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- d. Unmet Aspirations – the person may have perceptions of injustice; a feeling of failure; rejection of civic life;
- e. Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
- f. Learning Support Needs – students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

This list is not exhaustive, nor does it mean that all people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

**More critical risk factors could include:**

- a. Being in contact with extremist recruiters;
- b. Accessing violent extremist websites, especially those with a social networking element;
- c. Possessing or accessing violent extremist literature;
- d. Using extremist narratives and a global ideology to explain personal disadvantage;
- e. Justifying the use of violence to solve societal issues;
- f. Joining or seeking to join extremist organisations; and
- g. Significant changes to appearance and / or behaviour;
- h. Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

## **10. Health and Safety Policy**

Emerson College acknowledges and accepts its statutory duty to ensure, the health, safety and welfare at work of all its employees and students, as defined by the Health and Safety at Work Act 1974 (the Act) and is committed to full and proper compliance with all associated Regulations and Approved Codes of Practice. As far as reasonably practicable we will:

- Provide adequate control of the health and safety risks arising from our work.
- Consult with our staff on matters affecting their health and safety.

- Appoint competent persons to assist in providing advice and guidance.
- Provide and maintain safe plant and equipment.
- Ensure safe handling, storage and use of substances.
- Provide information, instruction and supervision for employees.
- Ensure all staff are competent to do their work, and give them adequate training.
- Prevent accidents and cases of work-related ill health.
- Provide adequate arrangement for welfare facilities at work.
- Maintain safe and healthy working conditions.
- Review and revise this policy as necessary at regular intervals.
- Maintain a safe workplace, ensure access and egress are safe and without risk.

We undertake regular risk assessments where required and work to minimize risks to staff, students, visitors, contractors and anyone else that may be affected by our activities.

To this end you will receive a Health and Safety induction during the first few days or weeks of your time here, and you should get to know the information contained on this sheet.

### **Fire**

Get to know where the fire extinguishers and fire exits are in your building(s). In the event of a fire, raise the alarm, leave the building, call 999 and ask for the fire brigade.

### **Accidents**

In the event of an accident call 999 for an ambulance or get first aid help. First aiders are:

Hiromi Kato, Nick Weidmann, Roi Gal-Or (Student Lead), and Clara Vormer. First aiders may change and the public notices will be updated accordingly.

Report accidents in the accident book kept in Reception.

### **Smoking and candles**

Neither is permitted inside the college buildings. If you smoke please use the ashtrays provided outside and do not drop smoking litter.

### **Emergencies**

There is always a member of staff on duty. In an emergency please telephone 07858 728 609 to speak to this person.

### **Responsibility**

Responsibility for Health and Safety matter lies with the Head of Estates and CEO, and the Maintenance Manager. Please direct any questions, comments or areas of concern to these people.

### **Driving and vehicles**

All vehicles on site and on college business must be driven safely and considerately. Unlicensed or non-roadworthy vehicles must not be left on College premises.

This policy is reviewed every year by the Head of Estates and CEO.

## 11. Food Policy

All meals need to be pre-booked with the Reception.

All meals are vegetarian with a vegan and gluten free option.

Emerson College does not cater for ALLERGIES and INTOLERANCES; we cannot take responsibility for allergic reactions caused by food provided at Emerson.

Allergies and intolerance:

- An allergy produces specific symptoms, such as swelling of the lips which usually develops within minutes of eating the food. Only a tiny particle of food is needed to trigger a food allergy. The symptoms of a food allergy can be life threatening.
- An intolerance produces more general symptoms, such as indigestion or bloating, that can develop up to several hours after eating. The symptoms of a food intolerance, unpleasant as they can be, are never immediately life threatening.

These are the standard definitions used by health services in the UK.

If you are unsure, talk to the kitchen staff before you eat. We provide self-catering facilities for those with food intolerances and allergies; please talk to staff.



## 12. Information Technology Systems Acceptable Use Policy

### Introduction

This policy describes Emerson College's official policy regarding use of Computer Systems and Network Resources, including Internet, and peripheral devices such as printers and scanners. It applies to all users of Emerson College's computing and/or network resources (including those who access Emerson College's Internet connection with a personal computer or other device) as well as those who represent themselves as being connected – in one way or another – with Emerson College. It is the responsibility of the user to know these guidelines, and to conduct their activities accordingly.

The acceptable use policy has the main purpose of protecting the individual person and the college from inappropriate use or misuse/damage of Information Technology (IT) equipment and the consequences of any misuse. Emerson College owns and operates various computer systems and network resources, which are provided for use by community members and staff in support of business, communication and educational activities. All users are responsible for seeing that these systems and resources are used in an effective, ethical and lawful manner. This document establishes rules and prohibitions that define acceptable use of these systems.

### Internet Use Policy

Internet access is provided through Emerson College's network resources. For security and network maintenance purposes, authorized individuals within Emerson College may monitor equipment, systems, and network traffic at any time and without further notice.

The College reserves the right to terminate Internet access if inappropriate activity is detected. Terminating access means banning the person from using Emerson College computers and other IT equipment and/or banning specific equipment from network access as deemed appropriate by Emerson College.

Emerson College computer systems and network resources (wired and/or wireless) may not be used for any unlawful or improper activities. These activities include, but are not limited to:

- Display or transmission of sexually explicit or sexually suggestive (obscene/pornographic) materials.
- Libel, harassment, sexual harassment, discrimination or slander.
- Solicitation of minors.
- Fraud or any other illegal activity.
- Infringement of copyright law.
- Damage/alteration of software and/or equipment.
- Hacking and/or spamming
- Extremism and Terrorism

**Additional Conditions of Use:** In addition to the above terms, users shall not:

- Visit Internet sites containing illegal, obscene, or hateful content which is objectionable and inappropriate for the workplace. Neither shall users send or receive material that is obscene or defamatory or which is intended to annoy, harass or intimidate another person or persons.
- Use any means of circumventing the web filter to access inappropriate Internet sites.
- Disable antivirus software. Internet "Border Control Systems" will be in place to scan and block any inappropriate web activity and material downloaded from an Internet Web site.
- Violate Emerson College's Confidentiality Policy by using any identifying information about any person supported or enrolled at Emerson College in a blog, article, or other publicly viewed Internet site. Emerson College's Confidentiality Policy applies in full to all Internet communications.

### Limited Use Policy

Network access has a cost and Emerson College is subject to limits in its usage of internet resources. In order to keep collective usage under certain limits usage of streaming (i.e. videos) and other large downloads must be limited to 30 minutes per session.

### E-mail Use Policy

The following are the conditions of use. Users shall not:

- Use e-mail for any illegal purpose, including but not limited to unsolicited mass email (spamming)

- Make or post indecent remarks, proposals or materials.
- Transmit commercial software or any copyrighted materials belonging to parties outside of Emerson College or within Emerson College itself.

### **Download and Executables Policy**

This policy has been established to set guidelines in an effort to clarify the type and nature of files that community members and staff are allowed to download from third-party sources onto their local computers (desktops, laptops or other devices). This includes both Internet and software downloads. Although it would be impossible to name every executable or download file in this policy, users should adhere to the following guidelines.

The Download:

- enhances the productivity of the user. For example, software included with a digital camera.
- is from a reputable source. (Well-known brand purchased from a trusted retailer.)
- does not subject the College to potential liability.

Please check with the IT department if you are uncertain if a particular application is safe to download.

**Should any of the above be compromised then you should report the incident(s) to a person responsible for running and maintaining the college's ICT Systems immediately.**

This policy is reviewed every year by Head of Education, the Head of Operations and CEO.

### 13. Internal Quality Assurance Policy

Internal Quality Assurance Policy Aim:

- To ensure that internal quality assurance and verification is valid, reliable and covers all assessors and programme activity.
- To ensure that the internal quality assurance procedure is open, fair and free from bias.
- To ensure that there is an accurate recording of internal quality assurance decisions.

In order to do this, Emerson College will:

- ensure staff are briefed and trained in the requirements for the internal quality assurance procedure.
- ensure effective internal quality assurer (IQA) roles are defined, maintained and supported.
- ensure that all assessment methods are fit for purpose.
- promote internal quality assurance as a developmental process.
- verify an appropriately structured sample of assessor work from all qualifications to ensure conformity to standards.
- plan an annual internal quality assurance schedule, linked to assignment plans.
- define, maintain, and support effective internal quality assurance.
- ensure that identified staff will maintain secure records of all internal quality assurance activity.
- provide standardised internal quality assurance documentation.
- use the outcome of internal quality assurance to enhance future assessment practice.

This policy will be reviewed every year by the Head of Education, Head of Operations and CEO.

## 14. Learner Admissions and Recruitment Policy

### Introduction

Emerson College's Admissions and Recruitment policy is underpinned by the commitment to a fair admissions system, whereby applicants are considered solely on the basis of their merits, abilities and potential, and are not discriminated against as a result of gender, colour, ethnic or national origin, age, social background, religious or political beliefs, sexual orientation or family circumstances.

The Policy complies with relevant equality and diversity legislation affecting the admission of students and takes account of sectoral best practice.

Emerson College commits itself to operate its admissions system in a way that is transparent and justifiable with procedures that are fair, clear, explicit and consistently applied for all students on all programmes.

As part of the admission's policy, Emerson College reserves the right to refuse an application without giving a reason to the applicant.

### Disability Policy

Emerson College strives to make its programmes as inclusive as possible for all potential learners. We wish to support disabled individuals to reach their full potential and to have equal opportunity for professional career development. In recent years legislation has come into force designed to help facilitate access to services for disabled individuals.

### Roles and Responsibilities

Overall responsibility for the Emerson College admissions and recruitment activity and implementation of the policy lies with Emerson College.

The Head of Education is designated as having overall responsibility for student admission activities.

All Emerson College staff members have a role and responsibility in relation to the recruitment and successful admission of students.

### Promotion, Recruitment and Selection

All marketing material will be accurate, kept up to date and be available at the correct point in the recruitment cycle.

The purpose of this material is to assist enquirers and applicants in their decision-making process.

All applicants will be given the opportunity to:

- Visit the campus where they will be taught
- Be informed about pastoral and academic support services
- Know the cost of their chosen programme and sources of financial support (if any)

Selection policies and procedures will be clear to enquirers/applicants and followed fairly, courteously, consistently and expeditiously. Any student who will be engaging directly and unsupervised with children and/or vulnerable adults as part of their programme of study, will be required to have a Disclosure and Barring Service check (DBS check).

Emerson College is committed to complying with the DBS Code of Practice.

### Information for Applicants

Applicants will be expected to know the obligations placed on them if they accept an offer of a place at Emerson College.

Emerson College reserves the right to remove an offer of a place if:

- information provided by an applicant proves to be false;
- an applicant is shown to have been involved in activity that is not compatible with being a student on the programme for which the applicant has applied.
- There are significant changes to advertised programmes (between an offer being made and registration). These must be conveyed to applicants as a matter of priority.

### Complaints and Appeals

Applicants will have the right to complain about the way their application has been processed. There will be a process that allows applicants to appeal against the decisions taken by the Emerson College.

Please see Complaints and Appeals Policy for further details.

### Monitoring and Review

---

Last updated January 2025

Emerson College is responsible for ensuring that appropriate arrangements for monitoring and reviewing the admissions process are in place.

This policy will be reviewed every year by the Head of Education and CEO.

## 15. Malpractice and Maladministration Policy

### Introduction

This policy is aimed at staff and learners at Emerson College.

The aim of the policy is:

- To identify and minimise the risk of malpractice by staff or learners.
- To respond to any incident of alleged malpractice promptly and objectively.
- To standardise and record any investigation of malpractice to ensure openness and fairness.
- To impose appropriate penalties and/or sanctions on learners or staff where incidents (or attempted incidents) of malpractice are proven.
- To protect the integrity of Emerson College and programmes and qualifications it offers.

In order to do this, Emerson College will:

- seek to avoid potential malpractice by using the induction period and the learner handbook to inform learners of the College's policy on malpractice and the penalties for attempted and actual incidents of malpractice.
- show learners the appropriate formats to record cited texts and other materials or information sources.
- ask learners to declare that their work is their own.
- ask learners to provide evidence that they have interpreted and synthesized appropriate information and acknowledged any sources used.
- conduct an investigation in a form commensurate with the nature of the malpractice allegation. Such an investigation will be supported by the Head of Education, Crossfields Institute and all personnel linked to the allegation. It will proceed through the following stages:
- make the individual fully aware at the earliest opportunity of the nature of the alleged malpractice and of the possible consequences should malpractice be proven.
- give the individual the opportunity to respond to the allegations made.
- inform the individual of the avenues for appealing against any judgment made.
- document all stages of any investigation.

Where malpractice is proven, Emerson College will apply penalties / sanctions relevant to the circumstances.

### Definition of Malpractice by Learners

This list is not exhaustive and other instances of malpractice may be considered by the College at its discretion:

- plagiarism of any nature.
- 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/test.

### Definition of Malpractice and Maladministration by Emerson College Staff

This list is not exhaustive and other instances of malpractice may be considered by the College at its discretion:

- improper assistance to learners.
- inventing or changing marks for internally assessed work (coursework or portfolio evidence) where there is insufficient evidence of the learner's achievement to justify the assessment decisions made.
- failure to keep learner coursework/portfolios of evidence secure.
- fraudulent claims for certificates.
- inappropriate retention of certificates.

- assisting learners in the production of work for assessment, where the support has the potential to influence the outcomes of assessment - for example where the assistance involves College staff producing work for the learner.
- 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 an amanuensis, this is permissible up to the point where the support has the potential to influence the outcome of the assessment.
- falsifying records/certificates, for example by alteration, substitution, or by fraud.
- fraudulent certificate claims, that is claiming for a certificate prior to the learner completing all the requirements of assessment.

This policy will be reviewed every year by the Head of Education and CEO.

## **16. Migrant Learner Sponsorship Policy**

Emerson College is also accredited through the British Accreditation Council (BAC) and we can accept students on a 6-month Short-term study visa. If you are a student requiring this visa, be sure to check the UK Visas and Immigration (UKVI) web site for new Regulations at the web site: <https://www.gov.uk/study-visit-visa>

In accordance with the UKVI rules and regulations students have a responsibility to comply with and provide the Registrar with a copy of their passport, identity card for foreign nationals or United Kingdom immigration status document (students should keep the original).

Once you are accepted on the course and have paid the course and accommodation fees, you will be issued a Confirmation letter. You will need this to apply for the visa.

This policy will be reviewed every year by the Head of Education and CEO.



## 17. Non-Harassment Policy

We recognise that harassment in any form is unacceptable and, in most cases, also unlawful. We are committed to ensuring that we are able to provide learning and working environment which is harmonious and acceptable to all.

It is your duty to respect the feelings and wellbeing of all your colleagues. What may be acceptable to one person may be upsetting and/or intimidating to another person. Harassment is unacceptable language or behaviour, which causes the recipient of such actions to be embarrassed, offended or threatened. Harassment can take many forms and can range from relatively mild banter to actual physical violence.

The following outlines examples of the type of behaviour which we consider would constitute harassment, for which the perpetrator(s) will be liable for disciplinary action and in serious cases liable to summary dismissal:

- coarse or insensitive jokes and pranks
- coarse or insensitive comments about appearance or character
- display of offensive material – written or pictorial
- deliberate exclusion from conversation or activities
- unwelcome familiarity or body contact
- abusive, insulting or threatening language
- demands or threats to intimidate or obtain favours
- threatened or actual violence

The above is not an exhaustive list.

We understand the sensitive nature of complaints of harassment, but would urge that if you feel that you are the victim of such behaviour, you implement the Grievance Procedure in order that the situation can be satisfactorily resolved. Individuals are assured that should you raise such a grievance, the matter will be dealt with promptly in a discreet and caring manner.

This policy will be reviewed every year by the Head of Education, Head of Operations and CEO.

## 18. Plagiarism policy (including AI)

“Plagiarism is the copying or paraphrasing of other people’s work or ideas without full acknowledgement.”

### **Procedures to be followed in cases of poor presentation and suspected plagiarism.**

When deciding whether a piece of work contains plagiarised material a judgement should be made by the markers/examiners about whether the student has made an attempt to reference their work. If attempts have been made, however inexpertly or incompletely, and it can be clearly determined which parts of the work are the student’s own, the case should be dealt with as one of poor presentation and not of plagiarism. An appropriate mark (which in some cases may be a fail mark) should be awarded and the student should be provided with guidance in their feedback. If no attempt has been made to reference, or if it cannot be clearly determined which parts of the work are written in the student’s own words, then the matter should be dealt with as a case of suspected plagiarism.

### **Matters to be taken into account when determining the level of plagiarism:**

- whether the assignment is in the first one or two assignments submitted,
- whether the student has little or no recent experience of higher education in the UK,
- whether they have received guidance and support, and
- whether it is reasonable to consider that they should be familiar with UK referencing systems

A meeting with the student will be arranged, normally within three weeks of the assignment submission. This meeting will include the tutor, student and a representative of the student if applicable.

The purpose of the meeting is to seek to establish whether the student was aware that their work contained plagiarised material, and whether there is evidence that supports the view that this was either done inadvertently or deliberately. The meeting should also provide the student with feedback about their assignment writing techniques and offer support and guidance.

Those conducting the meeting should consider all the evidence available to them, and reach a view on whether there is still a case of alleged plagiarism to answer, and whether they consider it was inadvertent or deliberate. Students should be asked to sign a formal report of the meeting summarising the academic deficiency and outcome.

## 19. Reasonable Adjustments and Special Considerations Policy

### **Introduction**

The purpose of this policy is to set out the procedures that learners and tutors should follow when implementing reasonable adjustments and special considerations.

### **Explanation of reasonable adjustment**

A reasonable adjustment helps to reduce the effect of a disability or difficulty that places the learner at a substantial disadvantage in the assessment situation.

Reasonable adjustments must not affect the validity or reliability of assessment outcomes, but may involve:

- changing usual assessment arrangements
- adapting assessment materials
- providing assistance during assessment
- re-organising the assessment physical environment
- changing or adapting the assessment method
- using assistive technology

Reasonable adjustments must be approved by Emerson College and set in place prior to assessment commencing. It is an arrangement to give a learner access to a qualification.

The work produced following a reasonable adjustment must be assessed in the same way as the work from other learners.

Below are examples of reasonable adjustment. It is important to note that not all adjustments described below will be reasonable, permissible or practical in particular situations. The learner may not need, nor be allowed the same adjustment for all assessments.

Reasonable adjustments may fall into the following categories:

- changes to assessment conditions
- the use of mechanical and electronic aids
- modification to the presentation of assessment material
- alternative ways of presenting responses
- use of access facilitators.

Please note that a reasonable adjustment must never affect the validity or reliability of assessment, influence the outcome of assessment or give the learner(s) in question an unfair assessment advantage.

Examples of reasonable adjustments as defined by the above categories are listed below.

- Allowing extra time, e.g. assignment extensions
- Using a different assessment location
- Use of coloured overlays, low vision aids,
- Use of assistive software
- Assessment material in large format or Braille
- Readers/scribes
- Practical assistants/transcribers/promoters
- Assessment material on coloured paper or in audio format
- Language-modified assessment material
- British Sign Language (BSL)
- Use of ICT/responses using electronic devices

### **College responsibility**

Learners must have the correct information and advice on the selected qualifications and that the qualifications will meet their needs. The recruitment process will include the College assessing each potential learner and making justifiable and professional judgments about the learner's potential to successfully complete the assessment and achieve the qualification.

Such assessment must identify, where appropriate, the support that will be made available to the learner to facilitate access to the assessment.

Where the recruitment process identifies that the learner may not be able to demonstrate attainment and thus gain achievement in all parts of assessment for the selected qualification, this must be communicated clearly to the learner. A learner may still decide to proceed with studying a particular qualification and not be entered for all or part of the assessment.

The College will ensure that learners are aware of:

- the range of options available, including any reasonable adjustments that may be necessary, to enable the demonstration of attainment across all required assessment; and
- any restrictions on progression routes to the learner as a result of not achieving certain outcomes.

### **Applying reasonable adjustment**

Reasonable Adjustments are the responsibility of the College. Reasonable adjustments are approved by the IQA before an assessment and are intended to allow attainment to be demonstrated. A learner does not have to be disabled (as defined by the DDA) to qualify for reasonable adjustment; nor will every learner who is disabled be entitled to reasonable adjustment. Allowing reasonable adjustment is dependent upon how it will facilitate access for the learner. A reasonable adjustment is intended to allow access to assessment but can only be granted where the adjustment does not:

- affect the validity or reliability of the assessment
- give the learner(s) in question an unfair advantage over other learners taking the same or similar assessment
- influence the final outcome of the assessment decision.

We are committed to fair and equal assessment of our qualifications. We expect all learners, regardless of age, sexual orientation, gender, race or disability to have equal and fair access to all the assessments we provide. Therefore, we recognise that in some cases there will be a need for some learners to have access to a range of arrangements which meet their individual needs and provide fair access to the assessments they are undertaking. This could include:

- learners who have a permanent disability or specific learning needs
- learners who have a temporary disability, medical condition or learning needs
- learners who are indisposed at the time of the assessment

### **What is a Special consideration?**

Special considerations are different to reasonable adjustments as they apply to a disadvantage that occurs to the learner either just before or during the assessment. Reasons for special consideration could be:

- Temporary illness,
- Injury
- Adverse circumstances at the time of the assessment.

A learner may be eligible for special consideration if:

- Their performance in an assessment is affected by circumstances beyond the control of the learner, e.g. recent personal illness, accident, bereavement, serious disturbance during the assessment
- The alternative assessment arrangements which were agreed in advance of the assessment proved inappropriate or inadequate
- Any part of an assessment has been missed due to circumstances beyond the control of the learner.

Applying for special considerations. All requests for Special Consideration must be submitted in writing to the Course Leader and to the Emerson Education Manager Applications for extensions to submission deadlines can be agreed by the IQA for the qualification or programme. Other applications need to be submitted to Crossfields Institute. All applications for special consideration can only be made on a case-by-case basis and thus separate applications must be made for each learner.

Learners may apply for special consideration during or after an assessment, but may not apply for special consideration in the case of a permanent disability or learning difficulty. Special considerations will be taken into account by the IQA at the time of the assessment. Special considerations may result in a small post-assessment adjustment to the mark of the learner. The size of the adjustment will depend on the circumstances during the assessment and will reflect the difficulty faced by the learner.

Each application for special considerations will be reviewed separately to ensure that the decision made maintains the equity, validity and reliability of the assessment for the learner and does not give the learner an unfair advantage. Learners need to submit evidence to the Course Leader to support their request for special consideration.

Applicants should complete a Special Consideration Application Form which can be found on the Crossfields Institute website.

The application should be signed and dated by the person accountable for quality assurance at Emerson. The signatory must declare that the information given is accurate.

The application should be submitted to Crossfields Institute as soon as possible, and not later than 7 working days after the assessment.

On receipt of the Special Consideration Application, the evidence will be assessed by the Crossfields Institute Quality Team and a response will be given within 3 working days of receipt using their professional judgement.

A record of all Special Considerations Applications will be recorded in the Special Considerations File, along with all documentation and a full audit trail of minutes, emails, reports and discussions to arrive at a decision.

This policy will be reviewed every year by the Head of Education and CEO.

## **20. Recruitment and Selection Policy**

Effective recruitment and selection is central and crucial to the successful functioning of Emerson College. It depends on finding people with the necessary skills, expertise and qualifications to deliver Emerson's objectives and the ability to make a positive contribution to the values and aims of the College.

Vacancies will generally be advertised online, in an appropriate newspaper or journal, and will also be posted on the Emerson College internet and notice boards. Emerson is keen to facilitate internal promotions wherever possible as development opportunities for our staff.

Candidates for all posts will, except on some occasions when a vacancy is restricted to internal recruitment, be asked to write a personal statement expressing interest in the position.

In applying for posts, all candidates will be provided with a job description, details of the appropriate conditions of service and details about Emerson. A brief statement about the appointment procedure will also be provided and, if possible, an indication of the date (or week) when interviews will be held. The job description will include a list of the main duties and responsibilities of the post, together with an outline of the qualifications and experience which candidates are expected to possess.

In drawing up the job description and conditions of service Emerson will ensure that no job applicant receives less favourable treatment than another on the grounds of disability, gender, race, religion or belief, age, sexual orientation, marital status, parental status, caring responsibilities or hours of work, and that no applicant is placed at a disadvantage unjustifiably by requirements or conditions which have a disproportionately adverse effect on a particular group.

Applicants will be asked to specify whether they have any disabilities, as defined in the Disability Discrimination Act 1995, and whether there are any reasonable adjustments needed for them to attend an interview. All applicants with a disability who meet the essential criteria for a job will be interviewed, and considered on their merits.

Applicants will be required to supply the names and addresses of two people from whom references can be obtained, one of which should normally be the applicant's current or most recent employer.

Only references for short listed candidates for interview will be obtained. References should normally be made in writing or email.

All completed applications forms are private and confidential and should only be made available to those directly involved in the recruitment and selection process.

A shortlist of candidates will be drawn up for interview, based entirely on merit and suitability for the post but taking account of Emerson's responsibilities in relation to the Disability Discrimination and Equalities Acts. Other than in exceptional circumstances, reasonable notice will be given to ensure that candidates have sufficient time in order to prepare for and make the necessary arrangements to attend the interview.

Interviews will be held by a panel comprising of ideally three persons, but a minimum of two persons, gender balanced wherever possible. The interviewers will encourage candidates to be at ease during the interview, in order that they can give a fair and accurate impression of themselves.

A set of questions will be agreed by the interview panel, where applicable, in advance and will be developed from the current job description for the post. The panel will seek to develop questions which ask the candidates to give examples of their previous relevant experience

It should be remembered that an interview is a two-way process, and candidates will be given every opportunity to view the offices where they will work and ask questions about Emerson, to ensure that they have a full understanding of the post for which they are applying and the way the college operates.

In addition to interviews, a range of other selection techniques may be used. In such circumstances reasonable notice and relevant information will be given to ensure that candidates have sufficient time and information to prepare.

All appointments will be made strictly on merit and related to the requirements of the job.

The Trustees have delegated powers to make appointments to posts below Director level or equivalent. For Director level posts the Trustees will consult to determine Board Members' level of involvement.

All interviewed candidates will be notified of the outcome of the selection process as soon as possible, either by telephone or email.

All unsuccessful candidates' application forms and interview notes will be retained for one year from the date of interviews taking place. After this date they will be destroyed.

All offers of employment will be made conditional upon satisfactory results from the following:

- two satisfactory references;
- confirmation of the right to work in this country (if appropriate)
- Criminal Records Disclosure (if appropriate).

All appointments into the College will be made subject to a probationary period of three calendar months. At the end of the probationary period, and subject to a satisfactory report by the appropriate head of section or line manager, employees will be notified in writing that they have successfully completed their probationary period. The probationary period can be extended by a further 3 months should the individual's line manager consider this appropriate.

Emerson College seeks to recruit employees on the basis of their ability and the requirements of the post.

Emerson College is committed to ensuring that no applicant receives less favourable treatment than another on the grounds of disability, gender, race, religion or belief, age, sexual orientation, marital status, parental status, caring responsibilities or hours of work.

This policy will be reviewed every year by the Head of Education, Head of Operations and CEO.

## 21. Redundancy Policy

In the event that we have to consider a potential redundancy situation it is important for all concerned to understand that certain procedures will be considered before any final decision to implement a redundancy is taken.

It is the policy of Emerson by careful forward planning to ensure as far as possible security of employment for its employees. However, it is recognised that there may be changes in the College's situation which may affect staffing needs. Emerson, in consultation with its employees will seek to minimise the effect of redundancies through the provision of sufficient time and effort to finding alternative employment for surplus staff. Where compulsory redundancy is inevitable the College will handle the redundancy in the most fair, consistent and sympathetic manner as is practicable and minimise as far as possible any hardship that may be suffered by the employees concerned.

Emerson will:

- i. Keep employees informed as fully as possible about staffing requirements and any need for redundancies.
- ii. Observe the statutory requirements as to consultation.
- iii. In discharge of the above duties, consult the appropriate employees and consider any alternative proposals put forward by them.
- iv. Disclose the following:
  - The reasons for the proposals
  - The numbers and descriptions of employees it is proposed to dismiss as redundant
  - The total number of employees of any such description employed at the establishment in question
  - The way in which employees will be selected for redundancy
  - How the dismissals are to be carried out, including the period over which the dismissals are to take effect
  - The formula for determining severance pay
- v. Endeavour to consult on the following matters where appropriate:
  - Measures to avoid or to minimise redundancies
  - The effect on earnings where transfer or downgrading is accepted in preference to redundancy
  - Arrangements for reasonable time off with pay to seek alternative work or to make arrangements for training
  - Assistance with job seeking

If it appears that it may be necessary to dismiss any employees for redundancy

- a) the College will consider all relevant circumstances to establish whether any reasonable alternative employment may be offered to the employee.
- b) If it appears that it is not possible or appropriate to offer such alternative employment, the College shall give as much notice as reasonably possible to affected individuals.

### Severance Payments

The College will pay the following to persons declared redundant:

- Statutory redundancy pay
- Accrued wages
- Commission/overtime payments

Accrued holiday pay and time in lieu in accordance with the College's usual rules/practice

### **Appeals**

Any employee who has been dismissed for reason of redundancy may appeal to a committee normally consisting of two Trustees. Such appeal can only be initiated by the employee giving written notice to your Line Manager within 7 calendar days of the notification of the dismissal to the employee by the College. The committee shall consider the redundancy situation afresh. The employee may be accompanied by a work colleague and shall be given a full opportunity to argue matters relevant to the appeal. Wherever practicable, the appeal shall be concluded within 5 working days after the Appeal Hearing.

This Redundancy Policy will be reviewed from time to time by the Head of Operations and CEO.



## 22. Reference Policy

### **Confidentiality of references and the GDPR and Data Protection Act 2018**

Faculty members should always consider writing open references, which are shown to the individual about whom they are written before they are sent. This has the advantage of openness. It reduces the risk of litigation against the writer and the AHCET by the person about whom the reference is written.

Furthermore, employees have the right under the General Data Protection Regulation (GDPR) to access information that organisations hold about them. However, there is an exemption under sch.2 to the Data Protection Act 2018 (which supplements the GDPR) that allows employers to refuse to disclose a confidential employment reference to an employee or former employee if he or she requests access to it.

When you write assignments and wish to refer back to the reading lists or other resources you may have used in your research, it is important that you use the below reference system. This is to ensure that your work does not become plagiarism. When the Internal Verifier and the External Assessor checks the portfolios, they will be looking for authenticity. Using the reference system will help you to demonstrate what part of your work is authentic and truly your own.

The Harvard style is the most commonly used style of referencing worldwide. The following guidelines recommend a version taken from the British Standard.

You can either include:

- A reference list - an alphabetical list of citations that have appeared in the body of your work and if you include this, you must also include
- A full bibliography - listing all the sources of information you have consulted in your research, and this list should also be arranged alphabetically.

Or you can just provide a full bibliography - check with your school regarding their requirements.

Below is a checklist of the details you need to include for the common types of material cited. The layout and formatting should be exactly as it is shown, though if you do vary it, you should remain consistent throughout your bibliography:

### **Books (one or more authors)**

Take the information from the title page and the reverse of the title page: FAMILY NAME, INITIAL(S). Year. Title. City of publication: Publisher

ADAMS, A. D. 1906. Electric transmission of water power. New York: McGraw

### **Books (edited)**

Write (ed) or (eds) after the editor's name(s): FAMILY NAME, INITIAL(S). (ed). Year. Title. City of publication: Publisher

CRANDELL, K.A. (ed). 1999. The Evolution of HIV. Baltimore: Johns Hopkins Press

### **Books (electronic)**

FAMILY NAME, INITIAL(S). Year. Title. City of publication: Publisher. [Date accessed]. Available from World Wide Web: <URL>

McROBBIE, A. 1998. British fashion design: rag trade or image industry? London: Routledge. [Accessed 31 May 2006]. Available from World Wide Web: <http://leeds.etailer.dppl.net/Home/html/moreinfo.asp?isbn=0203168011>

### **Journal article**

Use the title page of the journal volume or issue and the article: FAMILY NAME, INITIAL(S). Year. Title of article. Journal title. Volume (issue number), page number of your quotation

WALKER, J R. 1998. Citing serials: online serial publications and citation systems. Serials- Librarian, 33 (3/4), pp.343-356. N.B. Use p. to reference a single page, and pp. if it is a range of pages.

### **Journal article (electronic)**

Use information from the web site and the article: FAMILY NAME, INITIAL(S). Year. Title of article. Journal title [online]. Volume (issue number) [Date accessed], page number of your quotation. Available from World Wide Web: <url of site> ROYALL, C.P., B.L.THIEL, and A.M. DONALD, 2001. Radiation damage of water in environmental scanning electron microscopy. Journal of Microscopy [online]. 204 (3), [Accessed 9th May 2002], p.185. Available from World Wide Web: <http://www.blackwell-synergy.com/>

**Music (published)**

ORIGINATOR. Year. Title. Subsidiary originator. City of publication: Publisher.

**Unpublished documents**

If unsure of the date, make a sensible guess and use a question mark: FAMILY NAME, INITIAL(S). Year. Title. Unpublished.

FENDELL, R. 1985? Training and management for primary healthcare. Unpublished.

**Website with author**

Take the information from the webpage itself or the associated homepage - use the title bar and the credits at the bottom of the page, your own date of viewing the page and insert the words [online] and Available from World Wide Web: FAMILY NAME, INITIAL(S). Year. Title [online]. [Date accessed]. Available from World Wide Web : <url of site> HAWKING, S. 2000. Professor Stephen Hawking's website [online]. [Accessed 9th May 2002]. Available from World Wide Web: <http://www.hawking.org.uk/home/hindex.html>

**Website with no author**

Take the information from the webpage itself or the associated homepage - use the title bar and the credits at the bottom of the page, your own date of viewing the page and insert the words [online] and Available from World Wide Web: Title of website. Year as appearing on site [online]. [Date accessed]. Available from World Wide Web : <url of site>

Feminist Collections A Quarterly of Women's Studies Resources. 2002. [online]. [Accessed 9th May 2002]. Available from World Wide Web: <<http://www.library.wisc.edu/libraries/WomensStudies/fcmain.htm>>

This policy will be reviewed every year by the Head of Education, Head of Operations and CEO.

### **23. Registration and Certification Policy**

Registration & Certification Policy Aim:

- To register individual learners to the correct programme within agreed timescales.
- To claim valid learner certificates within agreed timescales. To construct a secure, accurate and accessible audit trail to ensure that individual learner registration and certification claims can be tracked to the certificate which is issued for each learner.

In order to do this, the College will:

- register each learner within the awarding organisation requirements.
- provide a mechanism for programme teams to check the accuracy of learner registrations.
- make each learner aware of their registration status.
- inform the awarding organisation of withdrawals, transfers or changes to learner details.
- ensure that certificate claims are timely and based solely on internally verified assessment records.
- audit certificate claims made to the awarding organisation.
- audit the certificates received from the awarding organisation to ensure accuracy and completeness.
- keep all records safely and securely for three years post certification.

This policy will be reviewed every year by the Head of Education and CEO.

## **24. Smoking, Alcohol and Drugs Policy**

### **Smoking Policy**

Emerson College is committed to the health, safety and wellbeing of its faculty, learners and visitors. We recognise that we have both a moral and legal duty to ensure that faculty members, learners and visitors have the right to work, study or visit without being exposed to second hand smoke relating to anything that can be smoked which includes tobacco, cigarettes, pipes (including water pipes such as shisha and hookah pipes), cigars and herbal cigarettes. When smoking outside in designated areas everyone should ensure that they dispose of cigarette butts and other litter in the receptacles provided.

### **Alcohol and Drugs Policy**

Emerson College is concerned that the use of alcohol and/or drugs should not impair any of its faculty, learners and visitors' health and social life. Moreover, to the extent that misuse of alcohol and / or drugs may have detrimental effects on faculty member's attendance and work performance or upon a learner's ability to effectively take part in their programme, the interests of the College and learners are invoked.

### **Drugs Act**

Under the Misuse of Drugs Act 1971, the possession or sale of drugs is a violation of the law. Emerson College will, therefore, make every effort to uphold the law and render assistance and support to law enforcement agencies legally and ethically pursuing their objectives, while at the same time render assistance to students when needed or necessary.

The Misuse of Drugs Act is the main piece of legislation covering drugs and categorises drugs as class A, B and C. These drugs are termed as controlled substances, and Class A drugs are those considered to be the most harmful.

Offences under the Act include:

- Possession of a controlled substance unlawfully
- Possession of a controlled substance with intent to supply it
- Supplying or offering to supply a controlled drug (even where no charge is made for the drug)
- Allowing premises you occupy or manage to be used unlawfully for the purpose of producing or supplying controlled drugs

Anyone found distributing drugs on premises will be dismissed from Emerson College.

This policy is reviewed every year by Head of Education and CEO.

## 25. Energy Management Policy

### Statement of Policy:

1. Emerson College strives to use energy in the most efficient, cost-effective, and environmentally responsible manner possible.
2. Our efforts to reduce energy use will support our commitment to students, residents and visitors, volunteers and staff, to the environment and the wider community.
3. Under this policy, energy management and energy from renewable sources will play a key role in the further development of Emerson College.
4. Emerson College will continuously work to improve energy performance, and continue to make achievements in this area.

### Objectives:

- Maximise energy performance, reduce operating expenses
- Demonstrate commitment to our customers, students, residents, staff and visitors, and to our wider communities, by reducing environmental impacts associated with energy use.

### Commitments:

To achieve these objectives, Emerson College has committed to:

- Compliance with all energy management laws, regulations and Codes of Practise in existing operations, upgrades and new development;
- Operating practices that seek to reduce energy and carbon emissions through works and management practises, continual improvement, training and use of energy saving and renewable technologies;
- Improve employee and staff awareness and encourage the sharing of experiences and expertise;
- Regular management review of energy objectives and targets;
- Communication of this policy to all stakeholders;
- Consultation with relevant bodies, community groups and neighbours about management matters and implementations of common concern.
- Responsibility for implementation and oversight of this Policy lies with Head of Site Development.

This policy shall apply to all of Emerson College's facilities and associated organisations, its members and contractors in service of Emerson College Trust Ltd.

This policy is reviewed every year by Head of Estates and CEO.

## **26. Continuing Professional Development (CPD) Policy**

### Principles, Values and Entitlements

1. Emerson College is a “learning community” and is committed to providing opportunities for the continuing learning and development of its entire staff. Professional development is the means by which the College is able to deliver team and individual development priorities.
2. The College has an expectation that all staff members will take an active role in their own professional development.
3. The College believes that all members of staff have a responsibility to support the professional development of colleagues.
4. Professional development will be co-ordinated by the Head of Operations and CEO in line with appropriate job descriptions for all staff.
5. All staff members of the Emerson College learning are entitled to high-quality induction and continuing support and development.
6. The key elements of the CPD policy comprise:
  - effective auditing and identification of need and aspiration;
  - appropriate match of provision to learning needs;
  - reliable and explicit evaluation of the impact of provision;
  - dissemination of effective practice.
7. The College will aspire to obtain appropriate quality standards from organisations that support the principles of effective professional development in order to validate and challenge its approach to learning and development.
8. The College will use a range of types of provision and providers adopting “Best Value” principles in determining these.
9. The College’s CPD provision will allow staff to develop their competencies progressively, allowing them to build on and reinforce their skills and expertise.
10. The College will provide and support opportunities for professional recognition including accreditation of the CPD undertaken.

### Auditing and identification of need and aspiration

1. The Head of Operations and Head of Education together with the CEO will be responsible for identifying the training and development needs of their staff. These needs will be identified through mechanisms such as performance management, self-evaluation, other internal and external monitoring and feedback evidence and through informal and formal discussions with individuals and teams. The outcomes of the needs analysis will be a CPD plan for each staff member.
2. The CEO will be responsible annually for discussing with the Governing Body the main training and development priorities and the budgetary implications of addressing these needs.
3. The Head of Operations and Head of Education together with the CEO will facilitate access to a range of professional development opportunities and be responsible for communicating opportunities as appropriate to staff.
4. The Head of Operations and Head of Education together with the CEO will be responsible for ensuring that appropriate opportunities are provided for all Emerson Staff.
5. The Head of Operations and Head of Education together with the CEO will be responsible for ensuring the effective organisation of access to opportunities, e.g. booking, confirmation and providing appropriate support such as organising relevant resources, setting up appropriate meetings, etc.

### Match of provision to learning needs

1. Emerson will support a wide portfolio of CPD approaches matched to the need of learners. These can be summarised in the following categories:
  - Work-based learning - e.g. in-house training courses, reflective practice, team sessions
  - Professional activity - mentoring, involvement of professional bodies.
  - Formal/educational - academic courses, conferences, research projects
  - Self-directed – e.g. reading, internet research
  - Other - voluntary work, etc.

2. Every employee can take part in an Emerson weekend course per year, (or the equivalent during the week), free of charge and if there is space in the course. Every employee can take part in Emerson cultural events and lectures free of charge.

#### Evaluating Impact and Disseminating Effective Practice

1. Following professional or other development, the participant will discuss with the Emerson Directors the opportunities to disseminate learning to other staff. Relevant feedback about the provision and the ideas should be provided for Emerson Directors. Where it is agreed that there would be benefit in a wider circulation or follow up, Emerson Directors will be responsible for organising that, e.g. circulating relevant resources, a session at a staff or managers' meeting.
2. Emerson Directors will be responsible for ensuring whether any follow up is needed to the provider, e.g. feedback, issues of access.
3. Emerson Directors will review annually whether any aspects of the CPD provision do not represent value for money.

This policy is reviewed every year by the Head of Operations, Head of Education and CEO

## **27. Emerson College Safeguarding Policy and Procedure**

This document outlines Emerson College's policy on identifying and responding to concerns regarding the safeguarding and protection of adults at risk of abuse. This policy, with the associated procedures, provides guidance for all staff who may have safeguarding concerns within the context of their work for Emerson College.

Emerson College is not a provider of services for children or services that are designated for adults at risk. However, in our courses we may come into contact with those who are vulnerable to abuse because of their age, physical or mental ability or ill health.

### **What does safeguarding mean?**

An adult at risk of abuse is any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and or support. The Care Act 2014 states "Safeguarding adults means protecting a person's right to live in safety, free from abuse and neglect". Key statutory guidance is "Care and support statutory guidance "17 August 2017. The "Safeguarding Vulnerable Groups Act 2006" was introduced to help avoid harm by preventing people who are deemed unsuitable to work with children and vulnerable adults from gaining access to them through their work.

### **What does Prevent mean?**

The Counter-Terrorism and Security Act 2015 is about preventing people from being drawn into radicalisation and must also be considered within the scope of this policy. Section 26 of this Act places a duty on certain bodies ("specified authorities" listed in Schedule 6 to the Act), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism".

### **We are committed to**

1. The care and respect of all who engage with Emerson College in any capacity.
2. The safeguarding and protection of adults at risk.
3. The promotion of a culture of good practice in relation to the work of Emerson College:
  - Adopting a safeguarding policy
  - A rigorous recruitment procedure for staff
  - Knowledge of, and preparedness to, refer to statutory agencies when abuse is known about or suspected
  - A willingness to respond, without delay, to any allegation or complaint made, which suggests that an adult may have been harmed
  - Providing training to our own staff in the safeguarding of adults at risk and Prevent
  - Obtaining DBS checks for relevant staff if it is possible that they will have direct contact with adults at risk as part of their work duties
  - Developing procedures and good practice guidelines to further these principles.

### **Policy Statement**

Our staff, including contractors and suppliers instructed by and acting on our behalf should not have any unsupervised contact with adults at risk during visits or in any other situation as part of their work for us unless they have a current DBS check and clearance. We require directly employed staff to declare unspent and exempt convictions at recruitment and appointment. We would not knowingly place an employee in a position that caused them to come into contact with adults at risk where the employee was unsuitable to do so.

The Designated Safeguarding Lead (DSL) has responsibility for reviewing and updating the Safeguarding Policy and Procedures annually, and following any safeguarding incident; promoting them throughout Emerson College and for being the first point of contact for anyone with concerns for an adult at risk.

### **Procedure when there is a Safeguarding (and Prevent) alert about an adult at risk**

Any Emerson College employee, member of faculty, third party or trustee who suspects there is abuse of an adult at risk, or to whom another has confided such abuse, should report this as soon as possible to the Designated



---

Safeguarding Lead (DSL) or the Deputy Designated Safeguarding Lead (DDSL). This is described as a “safeguarding alert”. If there is a concern that an adult is at immediate risk of harm the emergency services should also be called immediately.

The DSL or DDSL will contact the relevant local authority East Sussex Adult Social Care & Health ([Adult Helpdesk](#)) or [East Sussex Safeguarding Adults Board](#) and act in accordance with their guidance.

If an alert implicates a member of Emerson college staff, faculty or consultant, the DSL or DDSL, will inform the chair of trustees and liaise with the East Sussex Safeguarding Adult Helpdesk (0345 6080191) with regard to the possible suspension of the member of staff/consultant and advise regarding further action. These will also advise about making a referral to the [Local Authority Designated Officer \(LADO\)](#) who is responsible for dealing with such allegations.

If the individual raising an alert regarding an adult at risk feels that the DSL or DDSL has not responded appropriately, it is their right and responsibility to make a direct referral to the [local authority designated safeguarding service](#) (number given above).

If there is an alert implicating either the DSL or DDSL, the person with that concern should inform the other, who will follow the procedure above.

If the alert concerns both of the above the person raising the alert should contact the chair of trustees and the [local authority designated safeguarding officer](#).

### **Guidance on concerns, disclosure and response regarding adults at risk**

We are aware that anyone having a concern or receiving a disclosure that some kind of abuse has taken place may feel uncomfortable, hesitant or anxious about voicing it to someone else. It is important to report any concern to DSL or DDSL, without trying to make a judgement or assess its validity. It is the job of others to assess the risk. Emerson staff & faculty, consultants and trustees must simply ensure that they report any concern or disclosure.

If a disclosure is made, the person first being confided should allow the discloser to talk without rush or interruption; showing acceptance of what they say (however unlikely the story may sound) by reflecting back words or short phrases they have used. They should try to remain calm, even if on the inside they are feeling something different.

We will follow these guidelines for someone confided in:

- ensure that the adult at risk is and feels safe, calling emergency services if there is immediate danger of harm
- show that you take what they are saying seriously
- reassure and stress that they are not to blame
- be honest and explain that you will have to tell someone else (DSL or DDSL) if possible, ask them whether it is alright to make a note of what they are saying
- inform them that you will make a record of what has been said as soon as possible after the event
- if the discloser decides not to tell you after all, accept their decision but let them know that you are always ready to listen and that you will still need to tell the DSL or DDSL that a conversation was initiated;
- for those with a communication difficulty such as hearing or sight impairment, learning difficulty or where English is not their first language, try to ensure there is someone available who can interpret appropriately.

**A person who is confided in should not carry out their own investigation into an allegation or suspicion of abuse. Instead, they should report what they have been told and/or any concerns as soon as possible to the DSL or DDSL.**

It is then the job of the DSL or DDSL to collect and clarify the details of the concern and pass these on to statutory agencies with the legal duty to investigate.

[Key contacts for Adult Safeguarding & Prevent | Appendix A](#)  
[Safeguarding Flow Chart | Appendix B](#)  
[Prevent Flow Chart | Appendix C](#)

**If a person is in significant risk of harm or injury resulting from either Safeguarding of Prevent then Sussex Police should be contacted immediately on 999**

## Categories of Abuse

### What is meant by abuse?

A person may abuse by inflicting harm or failing to prevent harm. They may do it within a family, an institution or a community setting. Very often the abuser is known or in a trusted relationship with an adult at risk.

### Abuse of adults

Abuse is the violation of an individual's human and civil rights by any other person or persons. Abuse might be unintentional, the important factor is whether the person is harmed or not.

### Definitions

**Physical Abuse**, which can include any form of assault, over-medication, restraint or poor manual handling practice.

**Domestic Abuse/Violence**, including psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence.

**Sexual Abuse**, which can include rape and any sexual act which was not actively consented to or the person did not have the capacity to understand.

**Psychological/Emotional Abuse**, which can include threats, intimidation, coercion, harassment.

**Financial abuse** can include theft, borrowing money without repayment and any pressure in connection with wills or property, possessions or benefits.

**Modern Slavery** encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

**Neglect** which can include ignoring medical or physical needs, not providing access to appropriate health or social care, the withholding of the necessities of life, such as medication, adequate food, water and heating.

**Discriminatory Abuse**, which includes all forms of harassment, slurs or similar treatment based on a person's disability, ethnic origin, gender or sexuality, this is often called hate crime.

**Organisational Abuse**, including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation

**Self-Neglect**, this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

### Other categories of adult abuse:

- Exploitation (includes radicalisation)
- Spiritual abuse
- Multiple forms of abuse
- Inappropriate restraint
- Hate crime
- Human trafficking
- Forced Marriage
- Female Genital Mutilation (FGM)

### Recognising possible abuse

Staff, faculty, consultants and trustees are not expected to diagnose abuse but we need to be aware, recognise and be alert to signs that all is not well with an adult.

**Possible indicators may include an adult:**

- Disclosing partially or fully
- Frequent or unexplained minor injuries or bruising
- Signs of depression or stress which may happen suddenly or gradually emerge
- Neglected personal care
- Weight loss
- Dramatic change of behaviour /personality – this can happen very suddenly and unexpectedly and is often associated with fear
- Confusion
- Persistent financial hardship
- Denial that anything is wrong and an emphasis that all is extremely well
- Seeking help from numerous sources/people – this may be a direct request for help or attention seeking behaviour
- Acceptance or resignation of a situation as being part of being old and/or disabled
- Deference or submission to a suspected abuser
- Not getting to medical appointments

Abuse can happen in any setting where people are dependent on the care of others for their well-being. For further advice contact East Sussex Adult Social Care and Health on the phone number given above or [www.eastsussex.gov.uk](http://www.eastsussex.gov.uk)

**Appendix A | Key contacts for Adult Safeguarding & Prevent:**

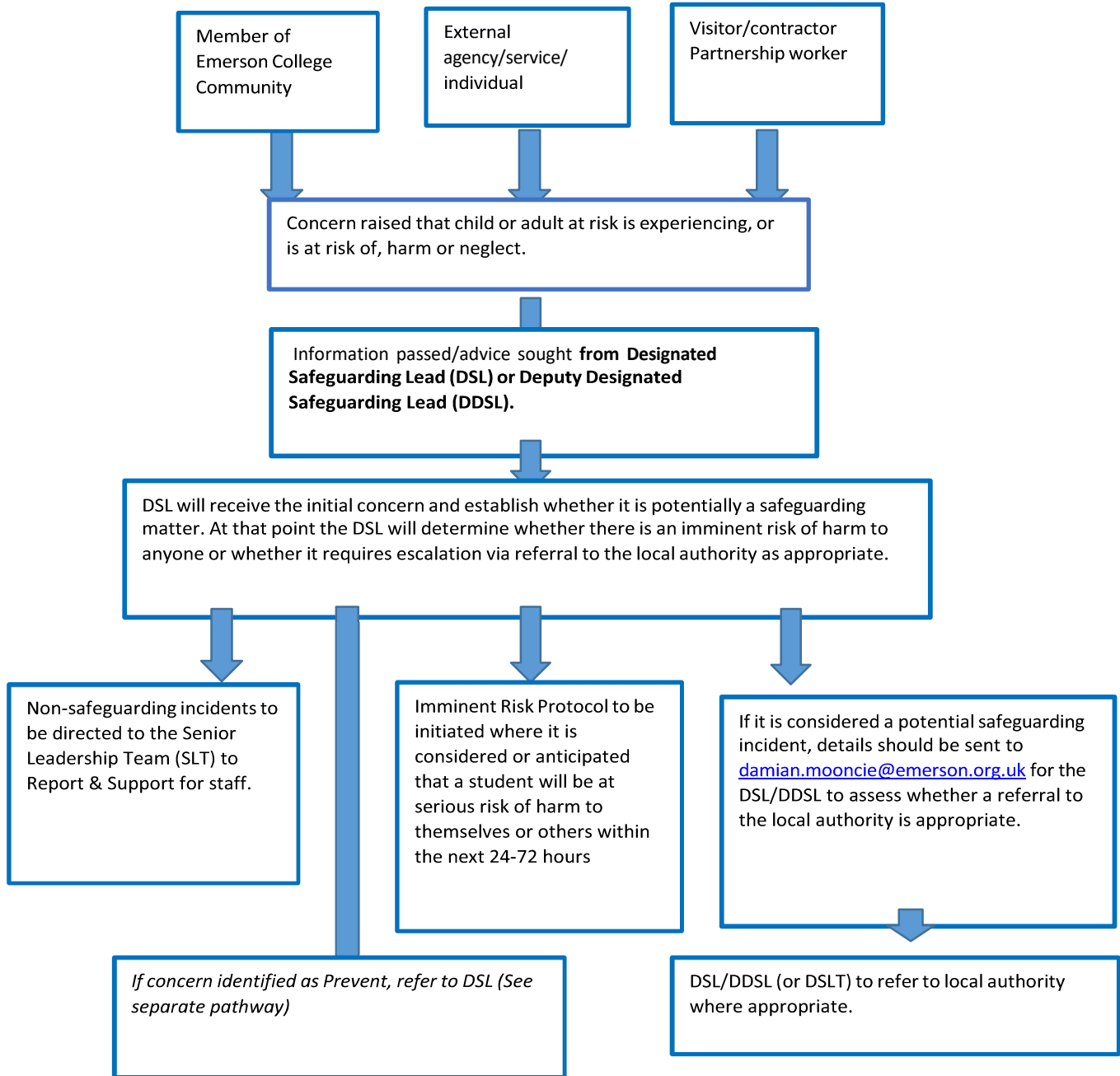
ROLE	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Damian Mooncie	<ul style="list-style-type: none"> <li>• 01342 822 238</li> <li>• 07756 307402</li> <li>• <a href="mailto:damian.mooncie@emerson.org.uk">damian.mooncie@emerson.org.uk</a></li> </ul>
Deputy DSLs		
Designated safeguarding lead Trustee (DSLTL)	Susanne Fuller	<ul style="list-style-type: none"> <li>• 01342 822 238</li> <li>• <a href="mailto:susanne.fuller@emerson.org.uk">susanne.fuller@emerson.org.uk</a></li> </ul>
Designated member of senior leadership team if DSL (and deputy) can't be available.	Chiara Cornes	<ul style="list-style-type: none"> <li>• 01342 822 238</li> <li>• <a href="mailto:registrar@emerson.org.uk">registrar@emerson.org.uk</a></li> </ul>

Sussex Safeguarding Adults Board		<ul style="list-style-type: none"> <li>● Contact Brighton &amp; Hove City Council Adult Social Care on 01273 295555</li> <li>● <b>Contact East Sussex Health and Social Care Connect on 0345 60 80 191</b></li> <li>● Contact West Sussex Adult Services on 01243 642121</li> </ul>
Local authority designated officer (LADO)	ESCC LADO Sam Efde	<p><a href="https://www.eastsussex.gov.uk/children-families/professional-resources/allegations/lado">https://www.eastsussex.gov.uk/children-families/professional-resources/allegations/lado</a></p> <p><a href="#">Lado referral form</a></p> <p><a href="mailto:Sam.Efde@eastsussex.gov.uk">Sam.Efde@eastsussex.gov.uk</a></p>
Other key contacts	<p>Single Point of Advice:</p> <p>Emergency Duty Service (after hours, weekends and public holidays):</p>	<ul style="list-style-type: none"> <li>● 01323 464222</li> <li>● <a href="mailto:SPoA@eastsussex.gov.uk">SPoA@eastsussex.gov.uk</a></li> <li>● 01273 335906/01273 335905</li> </ul>
PREVENT For East Sussex referrals		<a href="mailto:PreventReferralseastsussex@sussex.police.uk">PreventReferralseastsussex@sussex.police.uk</a>
Action Counter Terrorism   Support Line		0800 011 3764

Review / Contacts / References	
Policy title:	Emerson College Safeguarding Policy
Date approved:	November 2023
Approving body:	Board of Trustees
Last review date:	September 2021
Revision history:	V1
Next review date:	August 2024
Policy owner:	Designated Safeguarding Lead
Lead contact / author:	Designated Safeguarding Lead

**Appendix B: Safeguarding referral pathway: simple over-arching version**

EMERSON COLLEGE SAFEGUARDING REFERRAL PATHWAY



**Appendix C: Prevent referral pathway**

