



POLICIES AND PROCEDURES

Reviewed 14th July 2021

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ACCESS TO FAIR ASSESSMENT POLICY

22 JUNE 2021

Due for Review June 2022

All relevant company policies and procedures are made available to staff in a handbook, and will be available to learners and third parties by request.

The Tutor Team Ltd has in place the necessary systems and procedures to allow the provision of access arrangements including reasonable adjustments. These reflect the needs of individual learners while also ensuring that the assessment continues to enable a valid, reliable and consistent judgement to be made about the achievement of all learning outcomes against the stated assessment criteria.

Statement of Intent:

The Tutor Team will provide all learners with the opportunity to achieve their full potential by the most appropriate and direct route. The Tutor Team's policy of access to fair assessment ensures that all assessments/assessment activities undertaken by learners are:

- **Reliable.**
- **Valid.**
- **Fit for purpose.**
- **Transparent.**
- **Recognise and respect equality and diversity.**
- **Use appropriate language for assessment tasks.**
- **Include a variety of assessment strategies.**

There are procedures in place which underpin this statement and are translated in practice. The Tutor Team will ensure that all:

Tutors/Assessors:

- Undertake an induction which includes the principles of assessment and understand criterion referenced assessments relevant to the awarding bodies we work in partnership with.
- Record the outcomes of all assessment activities.
- Provide clear, constructive and developmental feedback to all learners mapped against achievement of the learning outcomes and assessment criteria.
- Plan assessment strategies and the timing of assessments so as not to unnecessarily overburden learners or to discriminate against particular groups of learners.

The writers of assessment materials will:

Produce assessment activities with due regard to the equality and the diversity of learners.

Ensure that assessment tasks allow for the generation of evidence in diverse ways.

Ensure that they use appropriate language at a level suitable to the unit.

Ensure that the assessment strategy allows for the generation of evidence against all the learning outcomes and assessment criteria for a unit.

Review assessment tasks on an annual basis and as part of the quality cycle.

Internal assessors will:

Verify the appropriateness of the assessment/strategy for a unit.

Verify the appropriateness of individual assessment tasks against the principles itemised above and any particular requirements of the qualification.

Ensure that tutor/assessor records are accurate, clear and up to date.

Ensure that tutor feedback to learners is clear, constructive, developmental, unambiguous and related to the assessment criteria.

Ensure that all assessment decisions sampled as part of The Tutor Team's internal verification process are valid.

Provide written feedback to tutors on all aspects of the assessment process.

Ensure that all quality improvement recommendations are monitored and any resulting actions are implemented.

Learners will:

- Be inducted into awarding body assessment methodology and understand criterion referenced assessments.

- Be made aware of the Centre's assessment complaints procedure* and how to access any relevant documentation to support its use.

- Be provided with an individual assessment plan through the effective use of individual learning plans.

- Be made aware of any time constraints attached to the achievement of the qualification.

***[Complaints Procedure](#)**

Receive feedback from all assessment activities to the The Tutor Team's timescale of within 10 working days which relates to the achievement/non-achievement of the assessment criteria. **(Note:** During periods of Centre closure and staff annual leave the 10 working days timescale for assessment feedback to learners commences from the first day of the re-opening of the

- Centre after a period of closure and the tutors return to work from annual leave and the student will be informed accordingly).
- Receive regular feedback against their achievement of individual units and their progress towards the overall qualification.
- Produce outcomes that must at all times:
- Meet the requirements of the specifications regardless of the process or method used.
- Be as rigorous as assessment methods used with other learners.
- Be assessable.
- Be able to be moderated or verified.
- Fulfil the demands of the assessment criteria, regardless of method used to obtain the evidence. The assessment criteria may not be amended, re-worded or omitted.
- Must achieve all the required units to gain an awarding body qualification. It may sometimes be the case that some full qualifications are inaccessible because of a learner's inability to demonstrate competence in all parts of the qualification or to meet the individual needs of the learner. In these cases, unit certification will always be available.
- Be eligible for reasonable adjustments if their performance during an assessment is likely to be substantially affected by a particular impairment. Many of these learners will be defined as being disabled under the Disability Discrimination Act.
- An adjustment to an assessment should only be considered where the difficulty experienced places the learner at a substantial disadvantage, in comparison with learners who are not disabled. Where the difficulty is minor, the Centre will assist and support the learner by offering help with study and assessment skills.
- **Awarding Body Moderators:**
- • Will be given access to all relevant documentation and assessment evidence to support the award of credit/qualifications as requested.

CANDIDATE ENQUIRIES AND APPEALS

26 June 2021

Due for Review June 2022

All relevant company policies and procedures are made available to staff in a handbook, and will be available to learners and third parties by request.

This policy sets out the steps for appealing against The Tutor Team's decisions and the process to be followed.

Candidates have the right to appeal any of the outcomes received for the qualifications they are undertaking.

Candidates will be made aware of the existence of this policy and the process for making an appeal at time of booking and paying for a course with The Tutor Team.

Appeals Procedure

In the first instance the candidate should lodge an appeal with the tutor or assessor allocated to them for the qualification. The appeal should be made within 14 days of the receipt of the disputed outcome.

The appeal should be made in writing by email or in a letter.

The tutor/assessor must immediately make The Tutor Team Ltd aware that an appeal has been made. This must be done within 48 hours of receiving an appeal.

The tutor/assessor must make an immediate response to the candidate to acknowledge receipt of the appeal. This must be done within 48 hours of receiving an appeal.

The tutor/assessor must undertake to resolve the appeal within 7 days of receiving the appeal in writing. The tutor/assessor must keep a record of all correspondence, student work and other materials that relate to the appeal. These materials must be kept as evidence.

If the issue remains unresolved to the candidate's satisfaction, the candidate should make a submission to The Tutor Team's Quality Assurance Officer, Mr Anthony Rose. Mr Rose is an individual independent of the internal Assessment or Moderation Process, or the teaching process. This submission should be in writing by email to anthonyrose@thetutorteam.com or FAO Mr Anthony Rose at the main office address. Mr Rose will request all materials relating to the appeal from the tutor/assessor and the candidate. He will keep the materials as evidence which may be passed onto ASDAN. He will acknowledge to the candidate that the appeal has been escalated within 5 days of receipt of the appeal. He will review the materials and decide on the appeal within 7 days of receipt of all relevant materials.

If the issue still remains unresolved to the candidate's satisfaction, the candidate should notify the Head of Centre, Dr Janet Rose. This notification should be in writing by email to drjrose@thetutorteam.com or FAO Dr Janet Rose at the main office address. She will acknowledge to the candidate that the appeal has been escalated within 5 days of receipt of the appeal. Dr Rose will review the appeal and all the case materials within 7 days of receipt of the relevant materials.

At this point, if the candidate is still unhappy with the decision, Dr Rose will refer the matter to ASDAN, following the ASDAN enquiries and appeals procedure – See Appendix A below. All materials collected as evidence will be made available to ASDAN.



APPENDIX A

ASDAN Policy and Procedures for Enquiries and Appeals

Definitions

An enquiry is a process through which ASDAN is asked to check one or more steps leading to a reported result.

An appeal is a process through which ASDAN may be challenged on the outcome of an enquiry about results, or where appropriate, other procedural decision affecting a centre or individual candidate.

Dissatisfaction with any other aspect of ASDAN's products or services may be addressed through ASDAN's Customer Complaints procedure.

As an approved awarding organisation ASDAN has confirmed with the regulatory authorities that it complies with the requirements of the Conditions of Recognition.

All centres must have an enquiries and appeals procedure available to their candidates. A centre's own procedures must be applied before any enquiry or appeal is submitted to ASDAN.

Stage One: Enquiries about results

Centres may request:

- A clerical check may be requested by telephone or email. This is normally a review of the external moderation decisions affecting candidates' results, or, where appropriate, other decisions affecting centres or candidates. In many cases a telephone conversation or email exchange will be sufficient to clarify moderation decisions or feedback and satisfy the centre.
- A formal enquiry must be made by submitting an Enquiry Request form. The Compliance Manager will acknowledge receipt of the enquiry within five working days, carry out a more detailed investigation to answer the enquiry, involving consultations with appropriate staff, and provide the centre with a written response within ten working days.
- Re-moderation of portfolios, to check that all parts of the portfolio have been examined against appropriate standards and recorded, and any adjustments and special consideration correctly applied. The outcome will be notified in writing together with a report of findings for each unit included in the enquiry. Re-moderation is carried out by a Principal or Senior External Quality Assurer, who is not the External Quality Assurer who made the original decision.

Stage Two:

Appeals Where a centre/candidate is not satisfied with the outcome of Stage One of the Enquiry and Appeals process, it may appeal to ASDAN to review the centre's/candidate's evidence, where a centre believes ASDAN has not applied its procedures consistently, properly or fairly.

Appeals may also be made against other decisions affecting centres and individual candidates, such as:

ASDAN's decision to reject an application for Centre Approval

the contents of a centre moderation or visit report

ASDAN's decision to decline a request for special arrangements/consideration

ASDAN's sanction as a result of malpractice, misconduct or maladministration

the outcome of any ASDAN investigation into a complaint raised by the centre

Reviewed Feb 20

Policy and Procedures for Enquiries and Appeals

- The centre has not met the procedural requirements for an appeal
- The centre has not met the required timescales
- Other relevant process has not first been completed (e.g. centre's internal procedures, enquiry about results)

The case and evidence presented will be reviewed by, as appropriate, ASDAN's Head of Qualifications and Quality and/or Compliance Manager, an auditor, External Quality Assurer or other relevant person and an independent person who has no connection with ASDAN.

The review may include, as appropriate, re-moderation of portfolios, a discussion with the centre or candidate and ASDAN personnel, a request for further information from the centre, candidate or ASDAN personnel or a visit to the centre by authorised ASDAN personnel. The Panel may request that centre personnel attend a hearing, which will be held at ASDAN premises during office hours. The appellant may be accompanied by a representative if they wish.

Stage Three: (Independent Review)

Where a centre/candidate is not satisfied with the outcome of the decision made at Stage Two of the Enquiry and Appeals process, they may request arrangements for an Independent Review Panel. In this case the appeal will focus on whether the awarding organisation used procedures consistent with the regulatory authorities, and whether those procedures were applied properly and fairly in making judgements. All members of the Panel will be independent and not affiliated with ASDAN.

The Independent Review Panel members is convened by the Head of Qualifications and Quality. The members will comprise Regulatory staff from other Awarding Organisations as listed by the Federation of Awarding Bodies (FAB). The decision of the Independent Review Panel is final.

information on fees for enquiries and appeals is outlined separately in ASDAN's Pricing and Fees document. There will be no charge where an appeal is upheld.

The following procedures apply for enquiries and appeals:

A particular issue is identified within a centre regarding awarding organisation decisions. Following internal consideration a decision is made to make a request for a clerical check to the awarding organisation. A clerical check is carried out by the Compliance Manager and a response made at the latest within 5 days of the initial contact.

A decision may be made in a centre to make a formal enquiry. Formal enquiries are made in writing to the Compliance Manager by submitting an Enquiry Request form. Enquiries must be sent as early as possible following awarding organisation decisions, and at the latest four weeks after external moderation decisions have been received by centres.

Once received by ASDAN details are recorded on a proforma and acknowledgement sent within five working days. The enquiry is logged for monitoring and held in a designated file.

Investigations are made to answer the enquiry, involving consultations with appropriate staff and a response provided in writing within ten working days.

A decision may be made in a centre to request re-moderation of sample portfolios by an independent External Quality Assurer. The request is made in writing to ASDAN's



Policy and Procedures for Enquiries and Appeals

Compliance Manager, who will liaise with the centre and the independent External Quality Assurer on collection and delivery of the portfolios.

A decision may be made in a centre to make an appeal against the outcome of an enquiry into results, or another decision affecting centres and individual candidates. Appeals must be made in writing to an ASDAN Compliance Manager, using the appropriate form (Request for Appeal against Results or other Awarding Organisation Decision and Independent Review). Applications for appealing a decision must be sent as early as possible following awarding organisation decisions and at the latest four weeks after relevant decisions have been received by centres.

If candidates wish to appeal against internal assessment decisions they must proceed in line with the centre's own policy. Candidates will be expected to provide evidence of appealing to their own centre. Only if they are not satisfied by the outcome of an internal appeal should a candidate approach ASDAN. The first point of contact is the Compliance Manager. Any such appeal must be made before any external moderation is completed. Any charges will be subject to the nature of the investigation but will be notified if a cost to the centre/candidate is to be incurred.

Once received by ASDAN details are recorded on a proforma and a written acknowledgement sent within five working days. Candidate appeals are logged for monitoring and held in a designated file.

Applications to appeal against the result of an enquiry about results or other decision affecting centres are discussed with the Review Panel which will include an independent member who is not an employee or assessor working for or otherwise connected to ASDAN, ASDAN's Head of Qualifications and Quality and Compliance Manager. The panel will investigate the appeal and centres and/or other relevant persons will be informed in writing of the action or decision (recorded on pro forma) within four weeks of the receipt of the application.

Applications are raised as part of a standing item at a Quality Assurance Managers' Meeting, logged for monitoring and held in a designated file.

If the decision is not straightforward and cannot be made without further consultation, advice will be sought from other bodies, e.g. Federation of Awarding Bodies, Ofqual and/or other regulatory bodies. In the event of continued consultation, acknowledgement is sent to relevant parties. Centres are informed of final decisions in writing as soon as possible.

If the centre is not satisfied with the findings of the Appeals Panel, they have the right to request an Independent Review to question whether the awarding organisation has used appropriate procedures and applied them properly and fairly in arriving at judgements. (Stage Three) All members of the Panel will be independent and not affiliated with ASDAN.

The whole process of enquiry and appeal is monitored through proforma, and reported on as a standing item on QA Managers Meeting agenda to establish whether there are common or recurring issues which may have an effect on centres. Where any such issues are identified, ASDAN will notify registered centres of the findings and provide recommendations for mitigation.

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The Head of Qualifications and Quality will provide quarterly reports to Trustees on the number and nature of enquiries and appeals, and their outcomes and make them available to the regulatory bodies on request.

Details of enquiries and appeals are archived to individual centre files, with pro forma retained in a designated file for monitoring.

If the outcome of an appeal affects the results of other candidates, appropriate action will be taken to protect the interests of those candidates and the integrity of the qualification, including where necessary the revocation of certificates.

If the outcome of the appeals process leads ASDAN to discover a failure in its assessment process, all reasonable steps will be taken to identify any candidate that has been affected, correct or mitigate as far as possible the effect of the failure and ensure that the failure does not recur in the future.

Where instances such as malpractice or other circumstances that may lead to an adverse effect are identified through these procedures, the regulators and other relevant AOs who may be affected will be informed.

ASDAN's policy and procedures for Enquiries and Appeals will be reviewed annually to ensure compliance with the requirements of the regulatory authorities, and to ensure that any failure discovered in the assessment process of another awarding organisation and notified by the regulators will not affect ASDAN's own assessment process.

ASDAN may need to access confidential information. We will ensure that such information is kept secure and only used for the purposes of the investigation and in line with relevant data protection legislation. We will not normally disclose the information to third parties unless required to do so, eg to our regulators and / or the police or other relevant and / or statutory bodies.



CANDIDATE SUPPORT INFORMATION

26 June 2021

Due for Review June 2022

All relevant company policies and procedures are made available to staff in a handbook, and will be available to learners and third parties by request.

The Tutor Team will always endeavour to support our candidates in their studies, their assessments and with any issues that interfere with their learning. We will supply our candidates with qualified, experienced teachers to lead their studies and ensure they have the requisite learning materials for their course. Wherever possible we will offer advice and assistance with administrative elements of course application and account set up, including setting up in Tutor Cruncher.

The Tutor Team is sensitive to the needs of SEND candidates. We have a SEND coordinator in place and will work to make necessary adjustments designed to lower barriers to learning for SEND candidates and make their learning experience positive and assessments fair. Please contact the centre for a free consultation.

The Tutor Team supports home-educated candidates across the UK and overseas. We have tutors who are experienced at working with home-educated candidates and understand their needs are sometimes different to those learning at school. Our online platforms, courses and tuition services are ideally suited to the needs of home-educated candidates of all ages and abilities.

The Tutor Team supports school and college candidates who wish to study courses not available at their institutions, such as the EPQ. We support school and college students who require extra support with their studies through our one-to-one tuition services. We can also support candidates who have been excluded from school to obtain qualifications and an education.

The Tutor Team welcomes mature candidates for courses and tuition. We help candidates secure qualifications to enhance employment prospects, to retrain for a career, or assist onto higher education. We have a flexible approach which permits study in the evenings and at the weekends – please ask for details.



CUSTOMER COMPLAINTS PROCEDURE

24 June 2021

Due for Review June 2022

All complaints relating to the provision of services that The Tutor Team Ltd has or will provide must be submitted in writing and sent to the Head of Centre, Dr Janet Rose.

We cannot respond to, or discuss, complaints made by telephone.

We will respond to the complaint in full once all the relevant facts have been established. Generally, our response will be within 7 working days from our receipt of the complaint.

Our response will include a summary of the event/s. Where appropriate, we will include a summary of the actions The Tutor Team Ltd will take to resolve the complaint.



CONFLICT OF INTEREST POLICY

26 June 2021

Due for Review June 2022

All relevant company policies and procedures are made available to staff in a handbook, and will be available to learners and third parties by request.

All staff of The Tutor Team, including centre staff, tutors, assessors and moderators, must be aware of the potential for a conflict of interest and take steps to report and resolve such a conflict.

What is a conflict of interest?

It is defined by the regulators (General/Standard Conditions of Recognition) as existing where:

- a) Its interests in any activity undertaken by it, on its behalf, or by a member of its group have the potential to lead it to act contrary to its interests in the development, delivery and award of qualifications in accordance with its Conditions of Recognition
- b) A person who is connected to the development, delivery or award of qualifications by the awarding organisation has interests in any other activity which have the potential to lead that person to act contrary to his or her interests in that development, delivery or award in accordance with the awarding organisation's Conditions of Recognition.
- c) An informed and reasonable observer would conclude that either of these situations was the case.

As an organisation The Tutor Team will take all reasonable steps to:

Identify and monitor:

- a) all conflicts of interest which relate to it.
- b) any scenario in which it is reasonably foreseeable that any such conflicts of interest will arise in the future.

Establish and maintain an up to date record of all conflicts of interest which relate to it.

Ensure that no conflict of interest which relates to it has an Adverse Effect (as defined in the General/Standard Conditions of Recognition), and where a conflict of interest has an adverse effect, take all reasonable steps to mitigate the Adverse Effect as far as possible and correct it.

Ensure that, in relation to assessment, moderation and awarding:

- a) No person who has a personal interest in the result will be involved.
- b) Where, having taken reasonable steps, the involvement by such a person cannot be avoided we will make arrangements for scrutiny by another person.

What is a personal interest?

A personal interest is a conflict of interest that relates to a particular individual. All conflicts of interest that fall under part (b) of our definition are personal interests, as are any perceived conflicts of interest under part (c) that relate to individuals, rather than to the awarding organisation itself.

NB: A personal interest can be financial or non-financial in nature.

Does the individual carrying out the assessment, investigation or appeal have any reason or incentive to make anything other than a decision in line with the relevant conditions?

Would an informed and reasonable observer conclude that such a reason or incentive exists?

As an organisation The Tutor Team will take all reasonable steps to:

Identify and monitor:

- a) all conflicts of interest which relate to it.
- b) any scenario in which it is reasonably foreseeable that any such conflicts of interest will arise in the future.

Establish and maintain an up to date record of all conflicts of interest which relate to it.

For examples of conflict of interest see Appendix A.

The Tutor Team will declare our awareness of the potential for a conflict of interest, and take reasonable steps to ensure that the assessment of a learner is not undertaken by any person who has a personal interest in the result of the assessment (eg where student is family or friend of assessor).

The Tutor Team will report such conflicts of interest in order that ASDAN can make arrangements for the relevant part of the assessment to be subject to scrutiny by another person.

The Tutor Team will report a perceived conflict of interest to ASDAN at the earliest opportunity using the Declaration of Conflict of Interest Form (Appendix B)



Appendix A

The following are examples of potential conflicts of interest:

A member of staff works for a centre and a family member takes a qualification at the same centre

A member of staff at the centre is completing a qualification delivered and assessed by the centre

Tutor, assessor or internal moderator working with more than one centre or private training provider

Tutor, assessor or internal moderator partaking in the appointment, promotion, supervision or evaluation of a person with whom they have family connections with

A member of centre staff involved in the delivery or outcome of an ASDAN qualification having a family connection with an ASDAN registered learner or learner's family

This list is by no means exhaustive

Appendix B

The ASDAN Conflict of Interest Declaration form Dropbox link is below

[ASDAN Conflict of Interest Declaration](#)

DATA PROTECTION POLICY

22 June 2021

Review Due June 2022

Introduction

In the course of your work with our Company you are likely to collect, use, transfer or store personal information about our employees, clients, customers and suppliers, for example their names and home addresses. The UK's data protection legislation, including the UK General Data Protection Regulations (UK GDPR) contains strict principles and legal conditions which must be followed before and during any processing of any personal information.

The purpose of this policy is to ensure that you are aware that everyone has a responsibility to comply with the principles and legal conditions provided by the data protection legislation, including the UK GDPR and failure to meet those responsibilities are likely to lead to serious consequences. Firstly, a serious breach of data protection is likely to be a disciplinary offence and will be dealt with under the Company's disciplinary procedure. If you access another employee's personnel records or any sensitive personal information without authority, this will constitute a gross misconduct offence and could lead to your summary dismissal. Additionally, if you knowingly or recklessly disclose personal data in breach of the data protection legislation, including the UK GDPR you may be held personally criminally accountable for any such breach.

Breach of the data protection legislation, including the UK GDPR rules can cause distress to the individuals affected by the breach and is likely to leave the Company at risk of serious financial consequences.

If you are in any doubt about what you can or cannot disclose and to whom, do not disclose the personal information until you have sought further advice from the Company's Data Protection Officer Janet Rose.

This policy does not form part of a contract of employment. However, it is mandatory that all employees, workers or contractors must read, understand and comply with the content of this policy and you must attend associated training relating to its content and operation. Failure to adhere to this policy is likely to be regarded as a serious disciplinary matter and will be dealt with under the Company's disciplinary rules and procedures.



Definitions

Data Subject: a living individual.

Data Controller: the person or organisation that determines the means and the purpose of processing the personal data.

Data Protection Legislation: includes (i) the Data Protection Act 2018, (ii) the UK General Data Protection Regulation (**UK GDPR**) and any national implementing laws, regulations and secondary legislation, for so long as the UK GDPR is effective in the UK, and the E-Privacy Directive (and its proposed replacement), once it becomes law.

Personal data: is any information that identifies a living individual (data subject) either directly or indirectly. This also includes special categories of personal data. Personal data does not include data which is entirely anonymous or the identity has been permanently removed making it impossible to link back to the data subject.

Processing: is any activity relating to personal data which can include collecting, recording, storing, amending, disclosing, transferring, retrieving, using or destruction.

Special categories of personal data: this includes any personal data which reveals a data subject's, ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, genetic, biometric or health data, sex life and sexual orientation.

Criminal records data: means information about an individual's criminal convictions and offences, and information relating to criminal allegations and proceedings.

What are the UK GDPR principles?

We are a data controller. This means that we are required by law to ensure that everyone who processes personal data and special categories of personal data during the course of their work with us does so in accordance with the data protection legislation, including the UK GDPR principles. In brief, the principles say that:

Personal data must be processed in a lawful, fair and transparent way.

The purpose for which the personal information is collected must be specific, explicit and legitimate.

The collected personal data must be adequate and relevant to meet the identified purpose.

The information must be accurate and kept up to date.

The personal data should not be kept in a form which permits identification of a data subject for longer than is necessary for the purposes for which it is used.

The personal data must be kept confidential and secure and only processed by authorised personnel.

Other rules under the UK GDPR state that:

The transfer of personal data to a country or organisation outside the UK should only take place if appropriate safeguarding measures are in place to protect the security of that data.

The data subject must be permitted to exercise their rights in relation to their personal data.

The Company and all employees must comply with these principles and rules at all times in their information-handling practices. We are committed to ensuring that these principles and rules are followed, as we take the security and protection of data very seriously.

You must inform us immediately if you become aware that any of these principles or rules have been breached or are likely to be breached.

What are the lawful reasons under which we would expect you to process personal data?

Whilst carrying out your work activities you are likely to process personal data. The Company will only expect you to process personal data where the business has a lawful basis (or bases) to process that information. The lawful basis may be any one of the following reasons or a combination of:

Consent has been obtained from the data subject to process their personal data for specified purposes.

Where we need to perform the contract we have entered into with the data subject, either for employment or commercial purposes.

Where we need to comply with a legal obligation.

Where it is necessary for our legitimate interests (or those of a third party) and the interests and fundamental rights of the data subject do not override those interests.

There are other rare occasions where you may need to process the data subject's personal information. These include:

Where we need to protect the data subject's interests (or someone else's interests).

Where it is needed for official purposes.

You must always ensure that you keep a documentary inventory of the legal basis (or bases) which is being relied on in respect of each processing activity which you perform.

Privacy Notices

Personal data must be processed in a lawful, fair and transparent way.

Before you begin collecting or processing personal data directly from a data subject you must ensure that an appropriate privacy notice has been issued to the data subject. Different notices are used for employment and commercial purposes. The content of the privacy notice must provide accurate, transparent and unambiguous details of the lawful and fair reason for why we are processing the data. It must also explain how, when and for how long we propose to process the data subject's personal information. We need to include information around the data subject's rights and most importantly, the notice should also explain how we will keep the information secure and protected against unauthorised use.

Where you intend to collect data indirectly from a third party or a public source (i.e. electoral register), you must ensure that a privacy notice is issued to the data subject within a reasonable period of obtaining the personal data and no later than one month after. If the data is used to communicate with the individual, then at the latest, it should be issued when the first communication takes place or, if disclosure to someone else is envisaged, a privacy notice should be issued, at the latest, when the data is disclosed.

You must only use data collected indirectly if you have evidence that it has been collected in accordance with the UK GDPR principles.

In all circumstances you must check that you are using an up-to-date version of the Company's privacy notice and it is being used in accordance with the Company's guidelines.



Purpose Limitation

The purpose for which the personal information is collected must be specific, explicit and legitimate.

When you collect personal information you should set out in the privacy notice how that information will be used. If it becomes necessary to use that information for a reason other than the reason which you have previously identified, you must usually stop processing that information. However, in limited circumstances you can continue to process the information provided that your new reason for processing the personal information remains compatible with your original lawful purpose (unless your original lawful basis was 'Consent').

Adequate and relevant

The collected personal data must be adequate and relevant to meet the identified purpose.

You must only process personal data where you have been authorised to do so because it relates to your work or you have been delegated temporary responsibility to process the information. You must not collect, store or use unnecessary personal data and you must ensure that personal data is deleted, erased or removed within the Company's retention guidelines. You must not process or use personal data for non-work related purposes.

The Company will review its records and in particular employees' personnel files on a regular basis to ensure they do not contain a backlog of out-of-date or irrelevant information and to check there are lawful reasons requiring information to continue to be held.

Accurate and kept up to date

The information must be accurate and kept up-to-date.

If your personal information changes, for example you change address or you get married and change your surname, you must inform your line manager as soon as practicable so that the Company's records can be updated. The Company will not be responsible for any inaccurate personal data held on its systems where you have failed to notify it of the relevant change in circumstances.

Kept for longer than is necessary

The personal data should not be kept in a form which permits identification of a data subject for longer than is necessary for the purposes for which it is used.

Different categories of personal data will be retained for different periods of time, depending on legal, operational and financial requirements. Any data which the Company decides it does not need to hold for a particular period of time will be destroyed in accordance with its retention of data policy.

Kept confidential and secure

The personal data must be kept confidential and secure and only processed by authorised personnel.

To achieve this you must follow these steps:

The Company has in place appropriate technical and organisational measures to protect against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to data. These procedures must always be adhered to and not overridden or ignored.

Where the Company provides you with code words or passwords to be used before releasing personal information, for example by telephone, you must strictly follow the Company's requirements in this regard.

Only transmit personal information between locations by e-mail if a secure network is in place, for example, encryption is used for e-mail.

Ensure that any personal data which you hold is kept securely, either in a locked filing cabinet or, if it is computerised, it is password protected so that it is protected from unintended destruction or change and is not seen by unauthorised persons.

Do not access another employee's records without authority as this will be treated as gross misconduct and it is also a criminal offence.

Do not write down (in electronic or hard copy form) opinions or facts concerning a data subject which would be inappropriate to share with that data subject.

Do not remove personal information from the workplace with the intention of processing it elsewhere unless this is necessary to enable you to carry out your job duties and has been authorised by your line manager.

Ensure that when working on personal information as part of your job duties when away from your workplace and with the authorisation of your line manager, you continue to observe the terms of this policy and the data protection legislation, in particular in matters of data security.

Ensure that hard copy personal information is disposed of securely, for example cross-shredded.

Manual personnel files and data subject files are confidential and are stored in a locked filing cabinet in the Exams Office. Only authorised employees have access to these files. For a list of authorised employees, please contact Janet Rose. These will not be removed from their normal place of storage without good reason.

It is not permitted to store data on memory sticks, discs, portable hard drives or other removable storage media.

Data held on computers are stored confidentially by means of TutorCruncher software. This is password protected and all financial data are encrypted.

The Company has network back-up procedures to ensure that data on computers that cannot be accidentally lost or destroyed.

Transfer to another country

Transfer of personal data to countries or organisations outside of the UK should only take place if appropriate safeguarding measures are in place to protect the security of that data.

We do not generally have a need to transfer data outside of the UK. However, if you are requested to transfer personal data to a country or organisation outside of the UK you must not transfer personal data to a country or organisation unless you have in place safeguards to ensure this is done in a legally compliant manner. You must speak to Janet Rose before sending data outside the UK.

The data subject rights

The data subject must be permitted to exercise their rights in relation to their personal data.

Under the UK GDPR, subject to certain legal limitations, data subjects have available a number of legal rights regarding how their personal data is processed. At any time a data subject can request that the Company should take any of the following actions, subject to certain legal limitations, with regard to their personal data:

- Allow access to the personal data
- Request corrections to be made to data
- Request erasure of data
- Object to the processing of data
- Withdraw their consent if consent was the legal basis for processing
- Request that processing restrictions be put in place
- Request a transfer of personal data
- Object to automated decision making
- Right to be notified of a data security breach

There are different rules and timeframes that apply to each of these rights. You must follow the Company's policies and procedures whenever you process or receive a request in relation to any of the above rights.

How should you respond to a data subject request?

You must follow the Company's data subject access procedure which details how to deal with requests and it describes the circumstances where a fee may be charged. The procedure includes the following:

Always verify the identity of the person making a data subject request and the legitimacy of the request.

If you are unsure as to whether you are authorised to action the request check the privacy notice to ascertain who is authorised to deal with data subject requests. If you are still unsure how to handle the enquiry, you should forward this to Janet Rose.

If you are authorised to deal with the request do not give out confidential personal information unless you have received the appropriate consent from the data subject. Seek explicit written consent to process the data subject request and ensure that you keep a clear audit trail of the request and your response.

Do not share personal information with a third party, unless the data subject has given their explicit prior consent to the sharing of their information. A third party is anyone who is not the actual data subject and can include a family member of the data subject.

Take great care not to accidentally share information with an unauthorised third party.

Be aware that those seeking information sometimes use deception in order to gain access to it.

Categories of information

During the course of your employment you may be required to process personal data which falls into different categories, general personal data and special categories of personal data. All data should be processed in accordance with the privacy notice and at all times in a confidential manner. However, where that data is classed as a special category extra care should be taken to ensure the privacy and security of that data.

This means that you should maintain a high level of security and you should only share this data with those who are also authorised to process that data. In the context of employee relations the scenarios when you may be required to process special categories information may arise for one or more of the following reasons:

In order to comply with employment and other laws when processing and managing situations connected with absences arising in relation to sickness or family/dependent-related leave.

To ensure health and safety obligations and other employment-related obligations are met, you may be required to process information about the physical or mental health or disability status of an employee in order to assess their capability to perform a role. You may also be required to monitor and manage sickness absence, recommend appropriate workplace adjustments and administer health related benefits.

Where it is needed in the public interest, for example for equal opportunity monitoring and reporting.

And any other reasons which we advise you of under a separate policy or notice.

We may also require you to process special categories of information in connection with customers and other third parties.

There may also be circumstances where we ask you to process this type of information in relation to assisting the Company with legal claims or to protect a data subject's interests (or someone else's).

You may be asked to process information in relation to criminal convictions. This should be processed with the highest degree of confidentiality and in accordance with any data protection legislation and privacy notices that are in force in our business.

If you are unsure about how you should process general personal data or special categories of personal data, you must contact the Data Protection Officer.

When will you need to seek consent?

In limited circumstances during your work you may need consent from a data subject in order to process personal data or special categories of data. You will be provided with training and details of which circumstances consent is needed and the type of consent that should be sought.

However, in limited circumstances, you may find it necessary to request a data subject to provide written consent to allow the processing of special categories of personal data. You will be provided with training and details of which circumstances consent is needed and the type of consent that should be sought. For example, in an employment context you should request the data subject's written consent to instruct a medical practitioner to prepare a medical report. If it becomes necessary to request consent to process special categories of personal data, you must provide the data subject with details of the information that will be required and why it is needed, so that they can make an informed decision as to whether they wish to provide consent.

You must not compel a data subject to provide written consent. Giving consent will always be a decision made by free will and choice and is not a contractual condition. Consent can be withdrawn at any time without any reason provided. You must not subject a data subject to a sanction or detriment as a consequence of withdrawing consent. This would be viewed a serious disciplinary issue.

Exemptions

In limited circumstances there are certain categories of personal data which are exempt from the UK GDPR regime. In an employment context these include:

Confidential references that are given by the Company to third parties or received by the Company from third parties. Only designated line managers can give Company references. Confidential references will not be provided unless the Company is sure this is the employee's wish.

Management forecasts and management planning (including documents setting out management plans for an employee's future development and progress).

Data which is required by law to be publicly available.

Documents subject to legal professional privilege.



Action to be taken in the event of a data protection breach

A personal data breach will arise whenever: 1) any personal data is lost, destroyed, corrupted or disclosed; 2) if someone accesses the data or passes it on without proper authorisation; or 3) if the data is made unavailable and this unavailability has a significant negative effect on a data subject.

In the event of a security incident or breach, do not try to handle this yourself.

You must follow the Company's Data Breach Policy which includes immediately informing the Data Protection Officer so that steps can be taken to:

Contain the breach;

Assess the potential adverse consequences for individuals, based on how serious or substantial these are, and how likely they are to happen; and

To limit the scope of the breach by taking steps to mitigate the effects of the breach.

The Data Protection Officer will determine within 72 hours the seriousness of the breach and if the Information Commissioner's Office (ICO) and/or data subjects need to be notified of the breach.

Record keeping

As we have fewer than 250 employees, we only need to document processing activities that:

- are not occasional; or
- could result in a risk to the rights and freedoms of individuals; or
- involve the processing of special categories of data or criminal conviction and offence data.

Training

All employees that handle personal information of individuals must have a basic understanding of the data protection legislation, including the UK GDPR. Staff with duties such as computer and internet security, marketing and database management may need specialist training to make them aware of particular data protection requirements in their work area. We will provide you with continuous training and updates on how to process personal data in a secure and confidential manner and in accordance with the spirit of the data protection legislation, including the UK GDPR. You will be required to attend all training and to keep yourself informed and aware of any changes made to privacy notices, consent procedures and any other policies and procedures associated with our internal processing of personal data.

You must regularly review all your data processing activities and ensure that you are acting in accordance with the most current best practice and legal obligations in relation to data security and confidentiality.

Automated processing and decision making

From time to time we may use computer programmes to process data and make automated decisions. We will provide you with a separate notice explaining when and how this happens. Where automated processing or decision making does take place and the effect of that processing impacts on the freedoms and legitimate interests of the data subject, then in certain circumstances the data subject can request for human intervention. This means that they can ask for a human to review the machine made outcome/decision.

Sharing personal data

We may share personal data internally as is necessary. You must always ensure that personal data is only shared with authorised persons and is shared in accordance with the purposes stated in any privacy notice or consents. Extra care and security must be taken when sharing special categories of data or transferring data outside of the Company to a third party.

Direct Marketing

We are subject to specific rules under the UK GDPR in relation to marketing our services. Data subjects have the right to reject direct marketing and we must ensure that data subjects are given this option at first point of contact. When a data subject exercises their right to reject marketing you must desist immediately from sending further communications.

Complaints

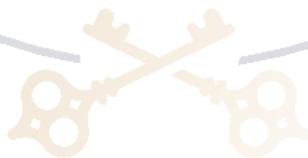
If you believe that this policy has been breached by a colleague or to exercise all relevant rights, queries or complaints please in the first instance contact our Data Protection Officer on drjrose@thetutorteam.com.

Changes to this policy

We reserve the right to change this policy at any time so please always check this document regularly to ensure you are following the correct procedures.

This policy was last updated on 22 June 2021

Compliance with UK GDPR is everyone's responsibility.



By signing this policy you confirm that you have read and understood the content of this policy and that you agree to adhere to the content and that you understand that breach of any aspect of this policy may lead to serious disciplinary action.

Signed by name of employee/worker/contractor:

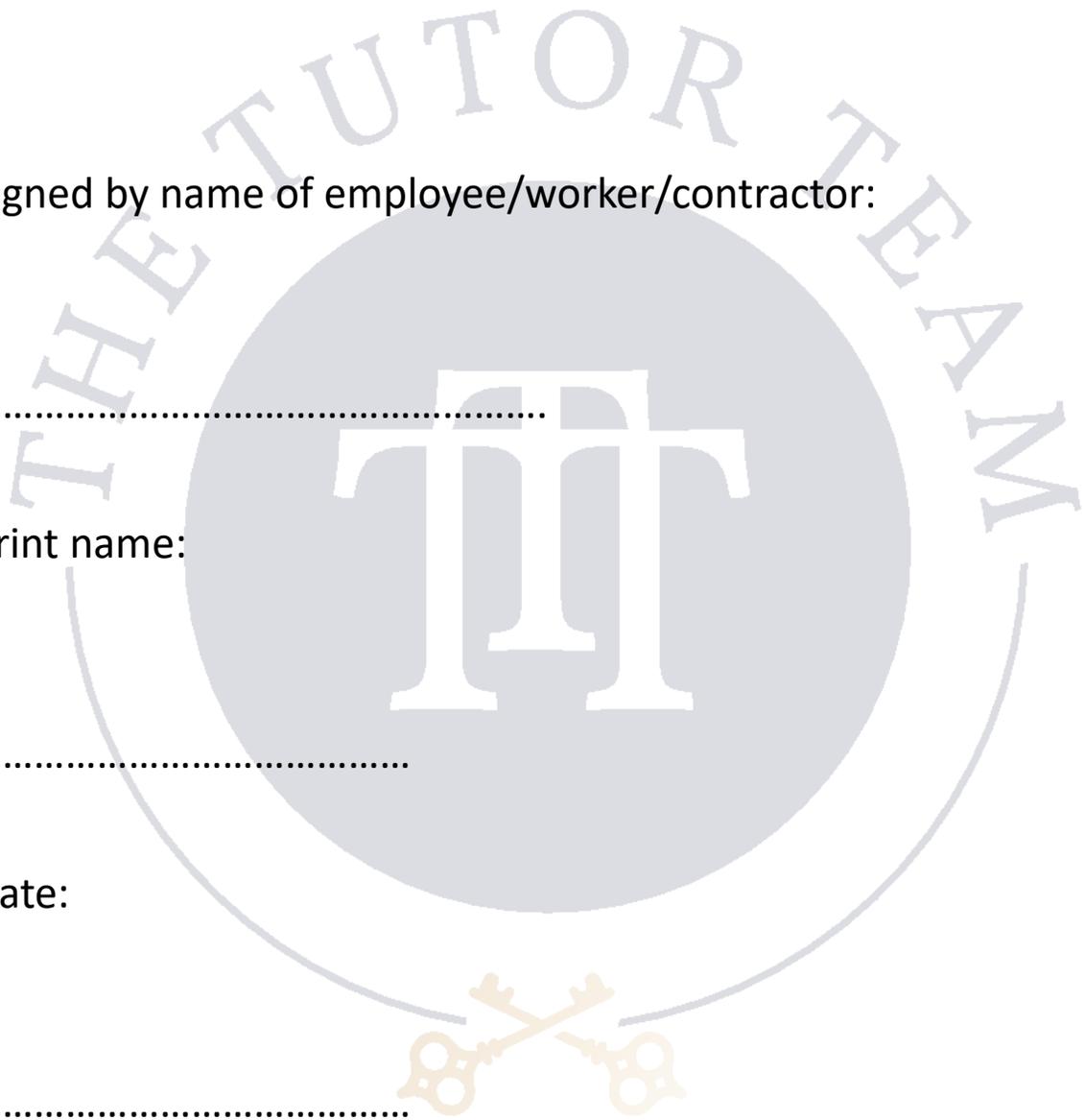
.....

Print name:

.....

Date:

.....



EQUAL OPPORTUNITIES POLICY

22 June 2021

Due for Review June 2022

All relevant company policies and procedures are made available to staff in a handbook, and will be available to learners and third parties by request.

Policy statement

The Company is an equal opportunity employer and is committed to a policy of treating all its employees and job applicants equally. The Company will avoid unlawful discrimination in all aspects of employment including recruitment and selection, promotion, transfer, opportunities for training, pay and benefits, other terms of employment, discipline, selection for redundancy and dismissal.

It is the policy of the Company to take all reasonable steps to employ and promote employees on the basis of their abilities and qualifications without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origins), religion or belief, sex and/or sexual orientation. In this policy, these are known as the 'protected characteristics'. The Company will appoint, train, develop and promote on the basis of merit and ability alone.

Employees have a duty to co-operate with the Company to ensure that this policy is effective to ensure equal opportunities and to prevent discrimination. Action under the Company's disciplinary procedure will be taken against any employee who is found to have committed an act of improper or unlawful discrimination. Serious breaches of the equal opportunities policy will be treated as potential gross misconduct and could render the employee liable to summary dismissal. Employees should also bear in mind that they can be held personally liable for any act of unlawful discrimination.

Employees must not harass, bully or intimidate other employees for reasons related to one or more of the protected characteristics. Such behaviour will be treated as potential gross misconduct under the Company's disciplinary procedure. Employees who commit serious acts of harassment may also be guilty of a criminal offence. The Company has a separate dignity at work policy which deals with these issues and sets out how complaints of this type will be dealt with.

Employees should draw the attention of their line manager to suspected discriminatory acts or practices. Employees must not victimise or retaliate against an employee who has made allegations or complaints of discrimination or who has provided information about such discrimination. Such behaviour will be treated as potential gross misconduct under the Company's disciplinary procedure. Employees should support colleagues who suffer such treatment and are making a complaint.

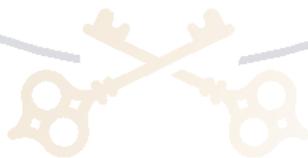
Direct discrimination

Direct discrimination occurs when, because of one of the protected characteristics, a job applicant or an employee is treated less favourably than other job applicants or employees are treated or would be treated.

The treatment will still amount to direct discrimination even if it is based on the protected characteristic of a third party with whom the job applicant or employee is associated and not on the job applicant's or employee's own protected characteristic. In addition, it can include cases where it is perceived that a job applicant or an employee has a particular protected characteristic when in fact they do not.

Discrimination after employment is also unlawful if it arises out of and is closely connected to the employment relationship, for example refusing to give a reference or providing an unfavourable reference for a reason related to one of the protected characteristics.

The Company will take all reasonable steps to eliminate direct discrimination in all aspects of employment.



Indirect discrimination

Indirect discrimination is treatment that may be equal in the sense that it applies to all job applicants or employees but which is discriminatory in its effect on, for example, one particular sex or racial group.

Indirect discrimination occurs when there is applied to the job applicant or employee a provision, criterion or practice (PCP) which is discriminatory in relation to a protected characteristic of the job applicant's or employee's. A PCP is discriminatory in relation to a protected characteristic of the job applicant's or employee's if:

- It is applied, or would be applied, to persons with whom the job applicant or employee does not share the protected characteristic,
- The PCP puts, or would put, persons with whom the job applicant or employee shares the protected characteristic at a particular disadvantage when compared with persons with whom the job applicant or employee does not share it,
- It puts, or would put, the job applicant or employee at that disadvantage, and
- It cannot be shown by the Company to be a proportionate means of achieving a legitimate aim.

The Company will take all reasonable steps to eliminate indirect discrimination in all aspects of employment.

Victimisation

Victimisation occurs when an employee is subjected to a detriment, such as being denied a training opportunity or a promotion, because they have raised or supported a grievance or complaint of unlawful discrimination, or because they have issued employment tribunal proceedings for unlawful discrimination or they have given evidence in connection with unlawful discrimination proceedings brought by another employee. However, an employee is not protected if they give false evidence or information, or make a false allegation, and they do so in bad faith. Post-employment victimisation is also unlawful, for example refusing to give a reference or providing an unfavourable reference because the former employee has done one of the protected acts set out above.

The Company will take all reasonable steps to eliminate victimisation in all aspects of employment.

Sources of recruitment

The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the job in respect of abilities and qualifications. The Company is committed to applying its equal opportunities policy at all stages of recruitment and selection.

Advertisements

Advertisements will aim to positively encourage applications from all suitably qualified people. When advertising job vacancies, in order to attract applications from all sections of the community, the Company will, as far as reasonably practicable:

1. Ensure advertisements are not confined to those areas or publications which would exclude or disproportionately reduce the numbers of applicants with a particular protected characteristic;
1. Avoid setting any unnecessary provisions or criteria which would exclude a higher proportion of people with a particular protected characteristic.

Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees in such a way that they do not restrict applications from employees with a particular protected characteristic.

However, where, having regard to the nature and context of the work, having a particular protected characteristic is an occupational requirement and that occupational requirement is a proportionate means of achieving a legitimate aim, the Company will apply that requirement to the job role and this may therefore be specified in the advertisement.

Selection methods

The selection process will be carried out consistently for all jobs at all levels.

The selection of new staff will be based on the job requirements and the individual's suitability and ability to do, or to train for, the job in question. Person specifications and job descriptions will be limited to those requirements that are necessary for the effective performance of the job. Candidates for employment, promotion or transfer will be assessed objectively against the requirements for the job.

With disabled job applicants, the Company will have regard to its duty to make reasonable adjustments to work provisions, criteria or practices or to physical features of work premises or to provide auxiliary aids or services in order to ensure that the disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled.

Selection tests

Any selection tests which are used will be limited to questions relating to the particular job and/or career requirements. The tests will measure the individual's actual or inherent ability to do or to train for the work or career. Thus, questions or exercises on matters which may be unfamiliar to applicants with a particular protected characteristic will not be included in the tests if they are unrelated to the requirements of the particular job. The tests which are used will be reviewed from time to time in order to ensure that they remain relevant and free from any unjustifiable bias, either in content or in scoring mechanism.

Applications and interviewing

All applications will be processed in the same way. The staff responsible for short-listing, interviewing and selecting candidates will be clearly informed of the selection criteria and of the need for their consistent application.

Wherever possible, all applicants will be interviewed by at least two interviewers. All questions that are put to the applicants will relate to the requirements of the job.

If it is necessary to assess whether personal circumstances will affect the performance of the job (for example, if the job involves unsociable hours or extensive travel), this will be discussed objectively, without detailed questions based on assumptions about any of the protected characteristics.

Training, transfer and promotion

The Company will take such measures as may be necessary to ensure the proper training, supervision and instruction for all line managers in order to familiarise them with the Company's policy on equal opportunities, and in order to help them identify discriminatory acts or practices and to ensure that they promote equal opportunity within the departments for which they are responsible. The training will also enable line managers to deal more effectively with complaints of bullying and harassment.

The Company will also provide training to all employees to help them understand their rights and responsibilities under the Company's equal opportunities and dignity at work policies and what they can do to create a work environment that is free from discrimination, bullying and harassment.

All persons responsible for selecting new employees, employees for training or employees for transfer or promotion to other jobs will be instructed not to discriminate because of one or more of the protected characteristics.

Where a promotional system is in operation, the assessment criteria will be examined to ensure that they are not discriminatory. The promotional system will be checked from time to time in order to assess how it is working in practice.

When a group of workers who predominantly have a particular protected characteristic appear to be excluded from access to promotion, transfer and training and to other benefits, the Company's systems and procedures will be reviewed to ensure there is no unlawful discrimination.

Terms of employment, benefits, facilities and services

All terms of employment, benefits, facilities and services will be reviewed from time to time in order to ensure that there is no unlawful direct or indirect discrimination because of one or more of the protected characteristics.

Equal pay and equality of terms

The Company is committed to equal pay and equality of terms in employment. It believes its male and female employees should receive equal pay where they are carrying out like work, work rated as equivalent or work of equal value. In order to achieve this, the Company will endeavour to maintain a pay system that is transparent, free from bias and based on objective criteria.

Grievances and complaints

All allegations of discrimination will be dealt with seriously, confidentially and speedily. The Company will not ignore or treat lightly grievances or complaints about unlawful discrimination from employees. Such complaints should be raised promptly under the terms of the Company's grievance procedure.

If the complaint involves bullying or harassment, the grievance procedure is modified as set out in the dignity at work policy.

Employees will not be penalised for raising a grievance, even if it is not upheld, unless the complaint was both untrue and made in bad faith.

Monitoring equal opportunity

The Company will regularly monitor the effects of selection decisions and personnel practices and procedures in order to assess whether equal opportunity is being achieved. This will also involve considering any possible indirectly discriminatory effects of its standard working practices. If changes are required, the Company will implement them. The Company will also make reasonable adjustments to its standard working practices to overcome substantial disadvantages caused by disability.

HEALTH AND SAFETY POLICY

AMENDED 23 JUNE 2021

DUE FOR REVIEW JUNE 2022

All relevant company policies and procedures are made available to staff in a handbook, and will be available to learners and third parties by request.

THE TUTOR TEAM LTD

Part 1: Statement of Intent

Our health and safety policy is to, so far as is reasonably practicable:

- *Prevent accidents and cases of work related ill-health.*
- *Manage health and safety risks in our workplace.*
- *Provide such information, instruction, training and supervision necessary to ensure that our employees are competent to undertake their work.*
- *Consult with our employees on matters of health and safety.*
- *Encourage all employees to engage in maintaining safe working practices.*
- *Provide and maintain safe plant and work equipment.*
- *Provide all necessary Personal Protective Equipment.*
- *Ensure that all substances are used, stored and handled safely.*
- *Maintain safe and healthy working conditions.*
- *Implement all necessary emergency procedures, including evacuation procedures in the event of fire or other significant incident.*
- *Ensure that adequate provision is made for welfare facilities and that adequate first aid provisions are made.*
- *Review this policy annually and revise whenever there is a change in circumstances, in work practices or the introduction of new legislation affecting the policy, so as to ensure that these standards of health and safety are maintained.*

Signed:

 J.K.ROSE

Print Name:

THE TUTOR TEAM

Date:

23 June 2021

Date for next review:

JUNE 2022

Part 2: Responsibilities for health and safety

Overall responsibility for health and safety:

DR JANET ROSE, DIRECTOR

The following people have responsibilities in the following areas:

LISA POOLEY.
DR JANET ROSE

Day-to-day responsibility for ensuring that this policy is put into practice:

DR JANET ROSE.

Additionally, all employees must:

- co-operate with supervisors and managers on health and safety matters;
- take reasonable care of their own health and safety; and
- report all health and safety concerns to an appropriate person (as detailed above).

Part 3: Arrangements for health and safety

The following is not an exhaustive list. You may have additional arrangements or some of these may not apply. You will need to amend the list and add the detail of your specific arrangements under the relevant headings.

• ***Risk Assessment***

Appropriate risk assessments will be completed, kept under review and their findings implemented.

We have completed the following risk assessments:

A general risk assessment for The Old Mill, Melbourne Street, Bratton, BA13 4RJ

A Covid Risk Assessment

• ***Communication of policy***

A copy of this policy is available on the staff intranet.

• ***Training of employees***

Training shall be provided on induction and on exposure to new or increased risks, for example following the introduction of new equipment, technology or systems of work. Refresher training shall be repeated periodically. Records of all training shall be kept.

• ***Consultation with employees***

Consultation with staff on health and safety matters will take place routinely as they arise and following any review of health and safety matters where changes are required.

• ***Fire Safety***

A fire risk assessment has been carried out for the site and will be kept under review.

Manual handling assessment and policy

Manual handling instructions must be followed in accordance with our manual handling procedure and training when carrying any load.

Selection of, provision of information to and monitoring of sub-contractors to ensure competence with reference to CDM Regulations.

Appropriate checks will be carried out to ensure sub-contractors working on site have the appropriate technical knowledge and knowledge of health and safety related to their work and to ensure their work is kept under review. Sub-contractors to provide risk assessments and method statements and evidence of their competency e.g. qualifications, training completed, references, or membership of a trade body, where applicable.

Public safety assessment and procedures.

A risk assessment has been carried out for members of the public on site and will be kept under review. All visitors shall be given safety information, instruction and training, protective clothing or safety equipment as may be necessary.

Evacuation & Emergency Procedures.

In the event of an emergency, the fire alarm will sound and a designated person will ensure the evacuation of all persons present on site to their assembly point, contact the emergency services when required and ensure compliance with any relevant emergency procedure.

Staff shall be informed of the emergency procedures on induction and

reminded each year. The emergency evacuation procedure will be rehearsed at least once each year.

Accident and investigation Procedures

Where there is an accident or incident at work, an accident or incident report must be completed. Any accident at work or in connection with work (whether involving an employee, visitor or other person), must be reported immediately to the appropriate person who shall arrange for the accident to be investigated and an accident report prepared, recommending means of preventing re-occurrence where appropriate.

Where the accident or incident is of a type that needs to be reported under Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

Work equipment selection and maintenance

All work equipment provided by the employer for use at work shall be:

suitable for the intended use;

safe for use, maintained in a safe condition and, in certain circumstances,

regularly inspected;

used only by people who have received adequate information, instruction and

training; and accompanied by suitable safety measures, e.g.

protective devices, markings, warnings.

All equipment used must be maintained in a safe condition and in good repair. Where necessary, equipment shall be inspected to ensure that it is safe for use without risk of injury or damage and appropriate records shall be kept up to date.

The use of any equipment that is not owned by the employer must be authorised in advance



Personal Protective Equipment

Personal Protective Equipment (PPE) appropriate for the risks involved and suitable for the task and the person undertaking it will be supplied and must be used whenever there is a risk to staff's health and safety which cannot be adequately controlled by alternative means. Where PPE is required it shall be provided at the employer's cost and must be used by staff in accordance with any manufacturer instructions and any directions and training given. Any defects in PPE must be reported immediately on discovery.

- ***Hazardous substances (COSHH), assessment and control measures***

In accordance with the Control of Substances Hazardous to Health Regulations 2002 (COSHH) we will:

- Undertake assessments of all work processes where substances are involved and
 - decide which of the processes involve the use of substances hazardous to health
 - so that decisions can be made about necessary control measures;
- Maintain records of all COSHH assessments;

- Inform the workforce of any findings of any assessments and provide any person exposed to substances hazardous to health with the necessary information, instruction and training for them to know the risks to health created by such exposure and the precautions that should be taken;
- Review all assessments (if the work process changes significantly) and annually from the date of the original assessment; and Provide suitable Personal Protective Equipment.



Display Screen Equipment (DSE) assessment / provision

The workstation of anyone who uses display screen equipment for a significant amount of time (two or more hours per day) will be assessed (and where necessary adapted) to ensure that its design and layout will avoid visual fatigue and back, shoulder, neck, arms, legs and wrist aches. Adequate chairs, work surfaces and equipment shall be provided.

Periodic breaks from using the equipment are encouraged.

On request, once a year, a voucher (or reimbursement of cost on production of a receipt) for an eye and eyesight test by an optician will be provided. If special corrective appliances for display screen work only are required and a normal appliance cannot be used, the employer will bear the cost of a basic appliance (e.g. the least expensive frame and basic lenses). Where necessary, training on the safe use of display screen equipment shall be made available.



Welfare provisions

Adequate provision will be made for welfare facilities at all sites.

First aid provisions

Adequately stocked first aid boxes will be kept on site. All First Aiders shall receive first aid training, attend refresher courses, pass all the necessary qualifications and hold a current First Aid at Work certificate.

Site security

The last member of staff leaving the premises is to ensure that:

- The doors to all inner offices are locked
- All windows are securely closed
- Blinds to all outside windows are lowered and closed
- The outside door is securely locked with the deadlock on exit



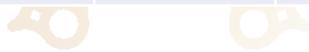
INDUCTION CHECKLIST

Name of employee:	
Job title and department:	
Start date:	
Date of completion of induction:	

	Completed by	Date	Comments
Welcome Introduction to department manager and line manager Complete and check any outstanding documents and forms Collect P45 and NI number Issue security pass			
Structure and organisation of the business Brief history Products and services Key clients Organisational structure Management structure Locations Departments Regulatory bodies Future plans and developments			

Structure and organisation of the business			
Brief history			
Products and services			
Key clients			
Organisational structure			
Management structure			
Locations			
Departments			
Regulatory bodies			
Future plans and developments			
Structure of the department			
Departmental structure			
Its relationship with other departments			
Introduction to other managers			
Introduction to work colleagues			
Tour of the office			
Entrances and exits			
Toilets			
Lockers/cloakroom			
Kitchen/canteen			
Staff notice boards			
Store rooms			
Other facilities			

WAM



<p>Terms and conditions of employment</p> <p>Probationary period</p> <p>Hours of work, rest breaks and overtime</p> <p>Salary, including when and how paid</p> <p>Expenses</p> <p>Annual leave entitlement and holiday rules</p> <p>Sickness and other absence rules</p> <p>Standards of dress</p> <p>Standards of performance and behaviour expected</p> <p>Disciplinary and grievance procedures</p> <p>Notice periods</p> <p>Other main terms and conditions</p> <p>Staff Handbook</p> <p>Trade union/employee representatives</p> <p>Useful contacts for issues, e.g. salary queries, computer problems, etc.</p>			
<p>Equal opportunities and dignity at work</p> <p>Equal opportunities policy</p> <p>Dignity at work policy</p> <p>Training</p>			

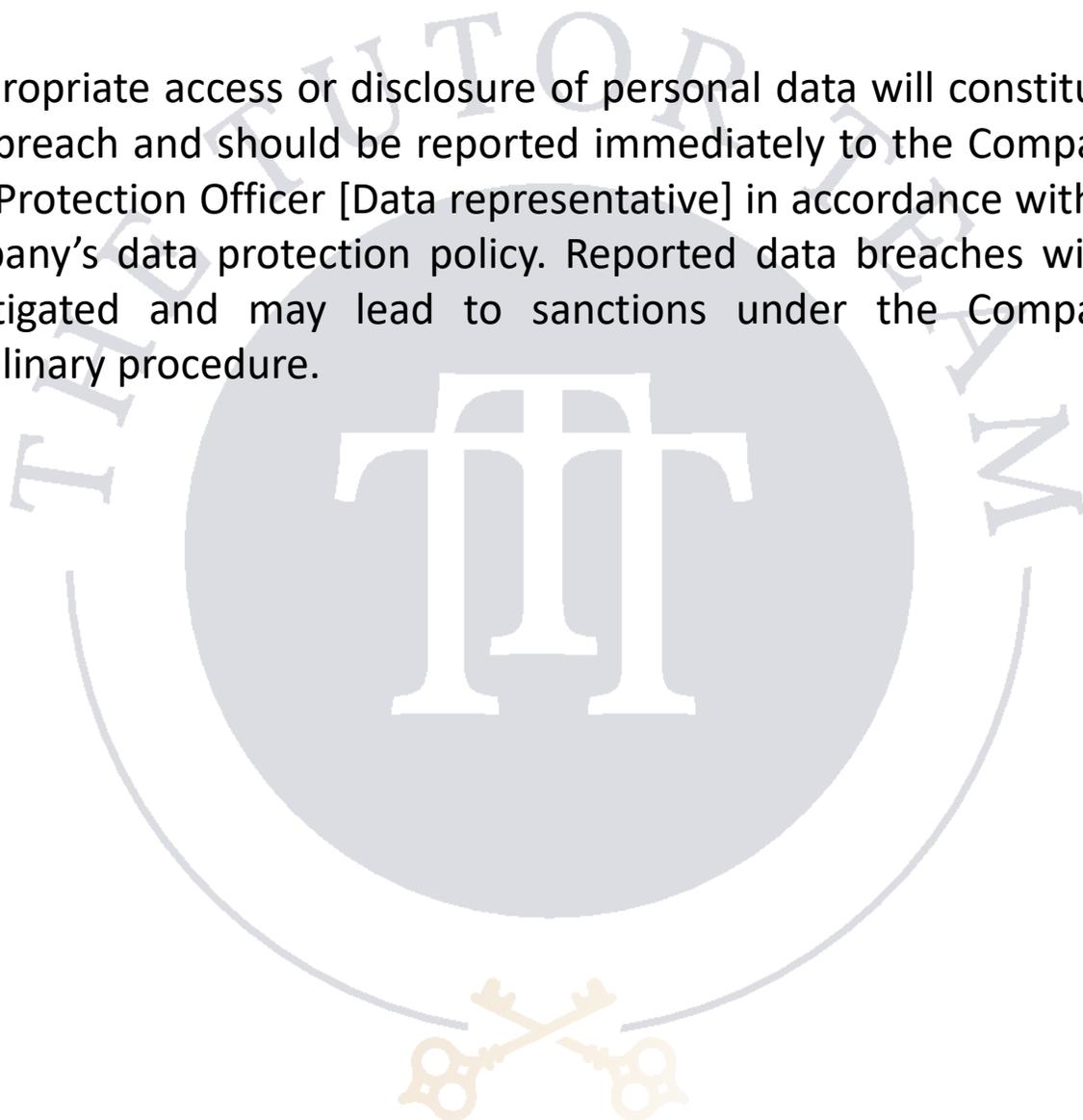
Job description			
Job duties			
Responsibilities			
Reporting line			
Workstation location			
Training provision			
Performance appraisals			
Promotion prospects			
Health and safety			
Risk assessment			
Safety hazards			
Safety rules and precautions			
Protective clothing			
No smoking policy			
Emergency procedures			
Location of fire exits			
Location of firefighting equipment			
Fire alarm and drill			
Location of first aid kit			
Procedure for reporting accidents and location of accident book			
First aid officers			
Safety representatives			
Use of equipment			
Telephone			
Computer, e-mail and Internet			
Printer			
Photocopier			
Other office equipment			

Signed by line manager:

Guidance note for managers

Before you begin the induction process, you must ensure that you have read the Company's data protection policy and relevant internal privacy notices. Any personal data collected during induction must be processed in accordance with the procedures and rules set down in these documents.

Inappropriate access or disclosure of personal data will constitute a data breach and should be reported immediately to the Company's Data Protection Officer [Data representative] in accordance with the Company's data protection policy. Reported data breaches will be investigated and may lead to sanctions under the Company's disciplinary procedure.



Internal Moderation Policy and Procedure (ASDAN)

24 June 2021

Due for Review June 2022

All relevant company policies and procedures are made available to staff in a handbook, and will be available to learners and third parties by request.

Aim:

This policy is to set out the Internal Moderation process with regard to ASDAN qualifications in our centre and links to the Non-Examination Assessment policy.

The aim of this policy is to ensure that:

- Internal moderation practices are valid and reliable and consistent, cover all tutors/assessors and meet the requirements of the awarding organisation
- Internal moderation procedures are fair and open
- Accurate and detailed records are kept of internal moderation decisions

Centre Responsibilities:

- Ensure that all assessment activities are valid, appropriate and fit for purpose
- Apply a strategy that will provide a representative sample across all tutors/assessors
- Create a plan of internal moderation in relation to all assessment activities
- Define, maintain and support effective internal moderation roles, including the provision of training where required

- Provide standardised documentation to support internal moderation activity and record-keeping
- Ensure that feedback and outcomes of internal and external moderation support future development of good practice
- Carry out an annual evaluation and review of internal moderation policy and procedures
- Provide support and training to staff

Internal Moderation Procedure:

- Internal Moderator allocated to assessor(s)
- Internal Moderator approves proposed schemes of work/assessments
- Co-ordinator ensures that Internal Moderator and assessor(s) have met
- First round of formative internal moderation conducted by the Internal Moderator. Records of sampling and internal moderation decisions kept. Feedback provided to assessor(s) and stored centrally in the centre portfolio for audit purposes
- Meeting held to discuss issues arising from the first round of internal moderation. Minutes recorded in portfolio.
- Second round of formative internal moderation conducted. Documentation copied as before and stored in the centre portfolio
- Any action noted by the Internal Moderator on the first round checked and signed off
- Meeting held to discuss issues arising from second round of internal moderation, minutes recorded in portfolio
- Third round of internal moderation conducted if necessary – documentation stored in centre portfolio
- Any continuing issues addressed and signed off
- Meeting held to discuss issues arising from third round of internal moderation and plan for external moderation – minutes stored in centre portfolio

- Co-ordinator establishes candidates and units to be put forward for external moderation
- Summative internal moderation conducted to include final checking of portfolios
- Arrangements made for external moderation
- External moderation takes place
- Standardisation meeting arranged to discuss feedback from external moderation and plan put in place to address any issues arising. Minutes stored in centre portfolio



Internal Moderation meeting notes (ASDAN)

Date:

Present:

Signature:



MALPRACTICE AND MALADMINISTRATION POLICY

23 June 2021

Due for Review June 2022

All relevant company policies and procedures are made available to staff in a handbook, and will be available to learners and third parties by request.

1. Introduction & Purpose

1.1 The Tutor Team has an obligation to its learners, employers, awarding bodies and partner universities to ensure that the qualifications its learners receive are a fair and accurate representation of their work, and of the knowledge and skills attained. The purpose of this policy is to ensure that the integrity of the qualifications is upheld by taking reasonable steps to prevent malpractice and/or maladministration and by approaching in a consistent manner, all reports of suspected or actual cases of malpractice and/or maladministration, whether carried out by learners or staff.

1.2 This policy has been prepared with reference to “JCQ General and Vocational qualifications Suspected Malpractice in Examinations and Assessments Policies and Procedures”
<http://www.jcq.org.uk/exams-office/malpractice>

1.3 Learners on programmes of study with awarding partners are subject to their academic standards and quality. Cases of suspected malpractice or maladministration will be referred to the relevant institution’s policies and procedures.

2. Definitions

2.1 Malpractice

'Malpractice', which includes maladministration and non-compliance, means any act, default or practice which is a breach of the Regulations by which The Tutor Team is required to abide or which compromises, attempts to compromise or may compromise the process of assessment, the integrity of any qualification or the validity of a result or certificate; and/or damages the authority, reputation or credibility of any awarding body or centre or any officer, employee or agent of any awarding body or centre.

2.2 Staff malpractice

Staff malpractice' means: malpractice committed by a member of staff or contractor (whether employed under a contract of employment or a contract for services); or an individual appointed in another capacity by a centre such as a tutor, invigilator, an Oral Language Modifier, a prompter, a reader, a scribe or a Sign Language Interpreter.

2.3 Learner malpractice

'Learner malpractice' means malpractice by a learner in the course of any examination or assessment, including the preparation and authentication of any controlled assessment coursework, the presentation of any practical work, the compilation of portfolios of assessment evidence and the writing of any examination paper.

2.4 Maladministration is defined as any activity or practice which results in non-compliance with an awarding body's administrative regulations and requirements including the application of persistent mistakes or poor administration.

3. Implementation

3.1 Suspected malpractice and maladministration will be dealt with under the guidance of “JCQ General and Vocational qualifications Suspected Malpractice in Examinations and Assessments Policies and Procedures”
[JCQ exams-office/malpractice](http://www.jcq.org.uk/exams-office/malpractice)

3.2 Incidents of suspected or alleged malpractice or maladministration must be reported so that an investigation can take place.

3.3 Allegations of staff malpractice or maladministration will be dealt with under the terms of the Staff Disciplinary Procedures.

3.5 Allegations of learner malpractice will be dealt with under the terms of the Student Behaviour Policy.

3.6 Depending on the outcome of an investigation, penalties or sanctions may be applied. If applied by the awarding body, a written request for an appeal can be made within two calendar weeks JCQ Appeals Booklet

<http://www.jcq.org.uk/exams-office/appeals/jcq-appeals-booklet-effective-from-september-2016> If applied by the The Tutor Team, refer to the appeals process within the relevant policy.

4. Responsibilities

4.1 Head of Centre responsibilities

Promptly notify the appropriate awarding body of suspicions or actual incidents of malpractice or maladministration in line with the requirements of the awarding body malpractice/maladministration policy. Take all reasonable steps to investigate any suspected incidents of malpractice or maladministration.

4.2 Management responsibilities

Take all reasonable steps to prevent malpractice or maladministration from occurring

Inform staff of their responsibilities under this policy

4.3 Staff responsibilities

Take all reasonable steps to prevent malpractice or maladministration from occurring

Implement assessment practices that reduce the opportunity for malpractice Abide by the specific assessment and administrative requirements for each course and qualification as laid down by the relevant awarding body.

Take seriously any allegations made in a professional capacity and report any suspected incidences of malpractice or maladministration to their line manager or Head of Standards

Ensure learners are aware of their responsibilities under this policy

Check the validity of all work submitted for assessment

Make learners aware of the procedures for reporting any suspected incident of malpractice or through means such as a candidate coursework information sheet.

4.4 Learner responsibilities

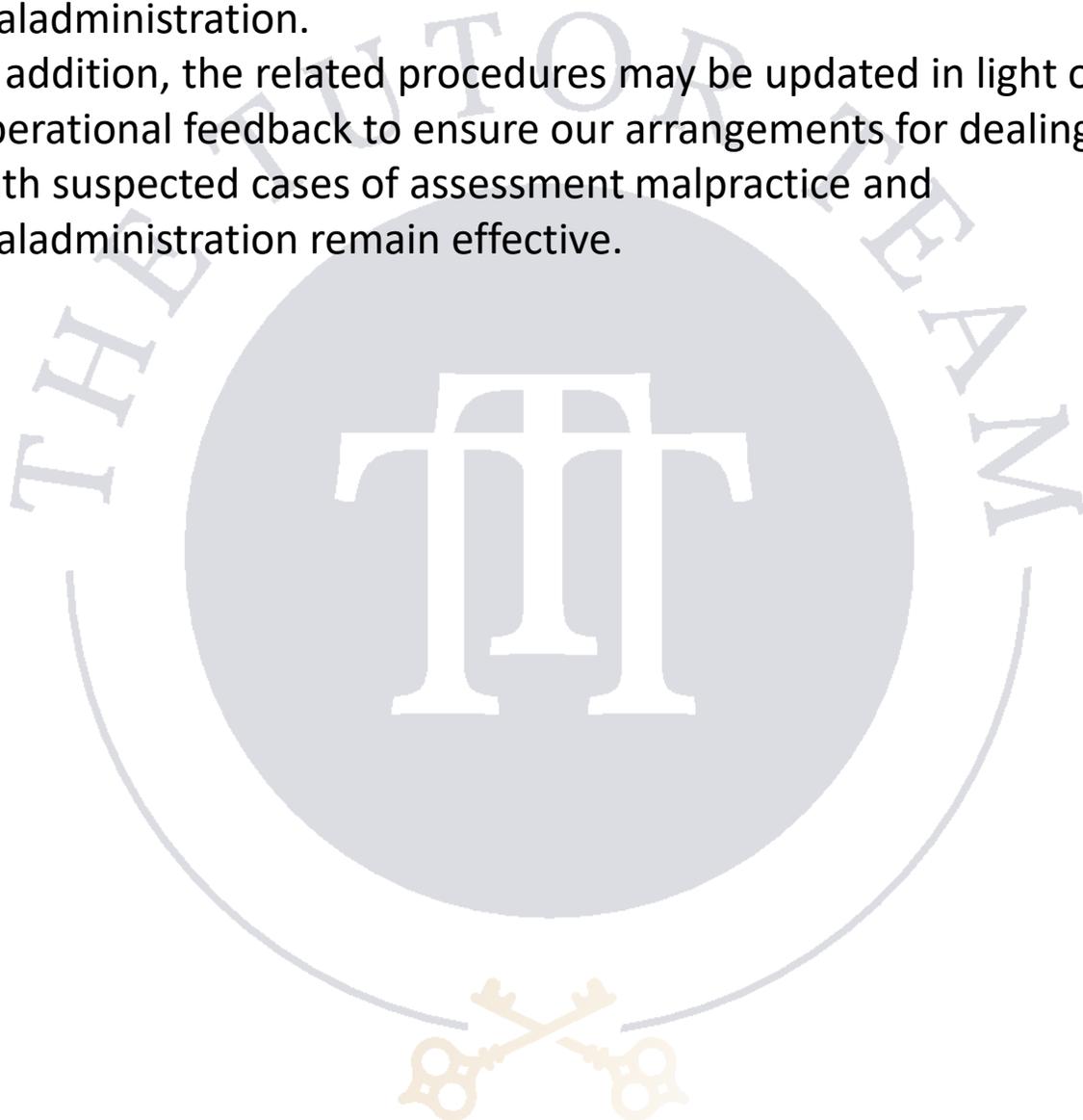
Submit work for assessment that is the learner's own original work

Report any suspected incident of malpractice or maladministration to a member of staff.

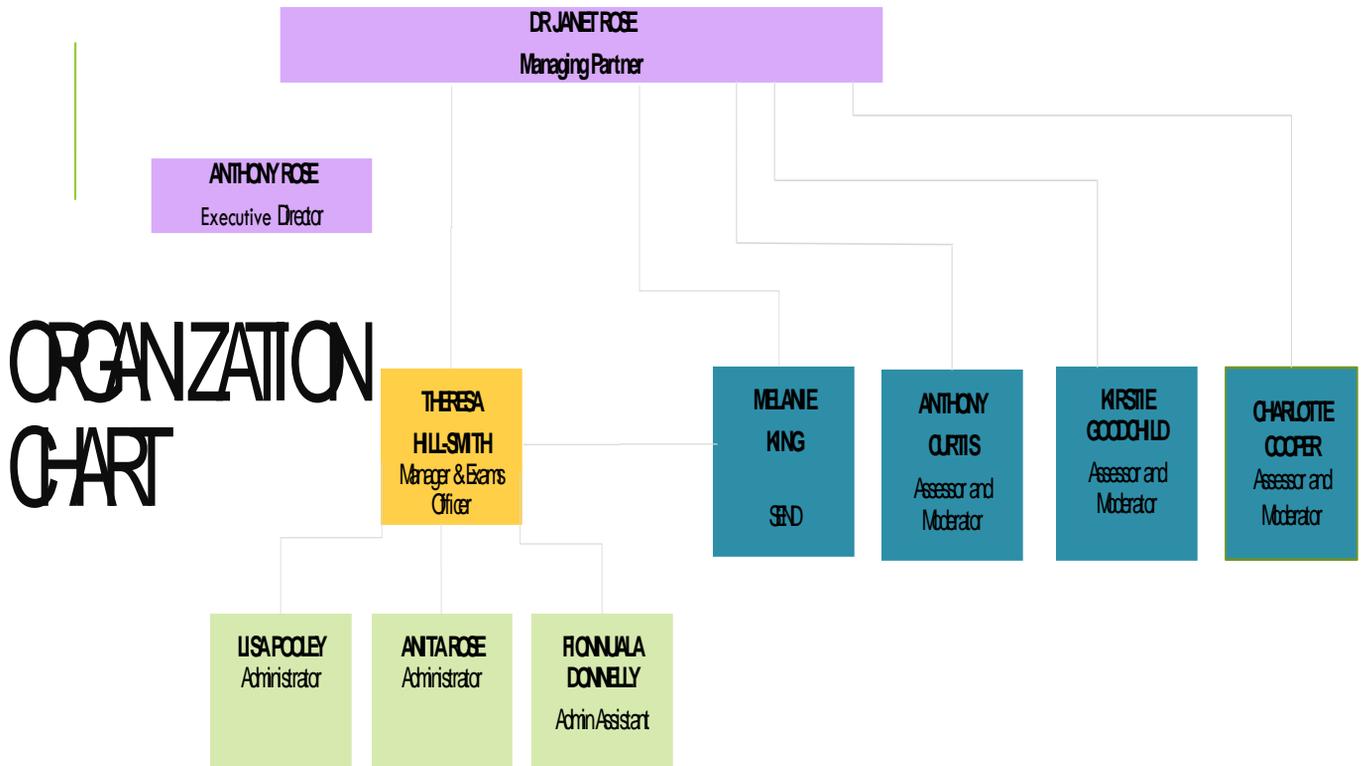
5. Monitoring, Review and Evaluation

This policy will be reviewed annually and revised as necessary in response to and including learner feedback, changes in its practices, advice from the regulatory authorities or external agencies, changes in legislation, or trends identified from previous instances of assessment malpractice or maladministration.

In addition, the related procedures may be updated in light of operational feedback to ensure our arrangements for dealing with suspected cases of assessment malpractice and maladministration remain effective.



Organization Chart



QUALIFICATION REVIEW PROCESS

26 June 2021

Due for Review June 2022

All relevant company policies and procedures are made available to staff in a handbook, and will be available to learners and third parties by request.

Reviews will include feedback from staff and candidates. This will be recorded in staff and student surveys and/or minutes of meetings. The Tutor Team understands that ASDAN's qualification review procedures also include the request for feedback from centre staff and candidates.

Feedback on ongoing and completed work will be given to students as part of regular formative assessment.

Following each round of internal moderation, a review meeting may be held, and feedback given to tutors and assessors, and to candidates where necessary.

After external moderation has taken place, a review meeting will be held. Feedback will be given to tutors and assessors and an action plan will be put in place to further develop practice and address any issues arising.

At the end of each academic year, a curriculum review will be held by staff.

INDUCTION & RECRUITMENT POLICY

Date Amended 22 June 2021

Due for Review June 2022

All relevant company policies and procedures are made available to staff in a handbook, and will be available to learners and third parties by request.

This document sets out the Company policy and procedures to be followed where there is a need to recruit a new employee into the Company. The information provided here serves as a guide only, and it is important that line managers keep the senior management of the Company up-to-date regarding future recruitment intentions. In all cases, the guidelines promulgated in the Equal Opportunities Policy are also to be followed.

The following procedure is to be carried out on every occasion where there is a need to recruit a new employee to the Company:

1. Complete a Recruitment Authorisation Form (copy attached), and ensure it is discussed with and signed off by a Director of the Company. This form requires a justification for the position as well as:
 - budgetary information/financial implications;
 - an up-to-date job description and person specification;
 - agreed advertisement wording and medium for publication; and
 - estimated cost of advertising the post.

Where recruitment is planned to fill a vacancy created by a leaver (other than on redundancy or business re-organisation grounds), approval will normally be granted automatically. If the post is new or upgraded, the Director will need to be satisfied that it can be justified.

1. The form must be forwarded to Theresa Hill-Smith, to arrive no later than Friday lunchtime for consideration the following week. Any forms which are not fully or correctly completed will be returned.

2. Your request will be considered by the senior management of the Company. The outcome will be notified to you in writing. Should your request be turned down, you may find the reasons why by speaking to Theresa Hill-Smith.

If your request has been agreed to, the relevant member of senior management will make contact with you and discuss the best way to fill your vacancy.

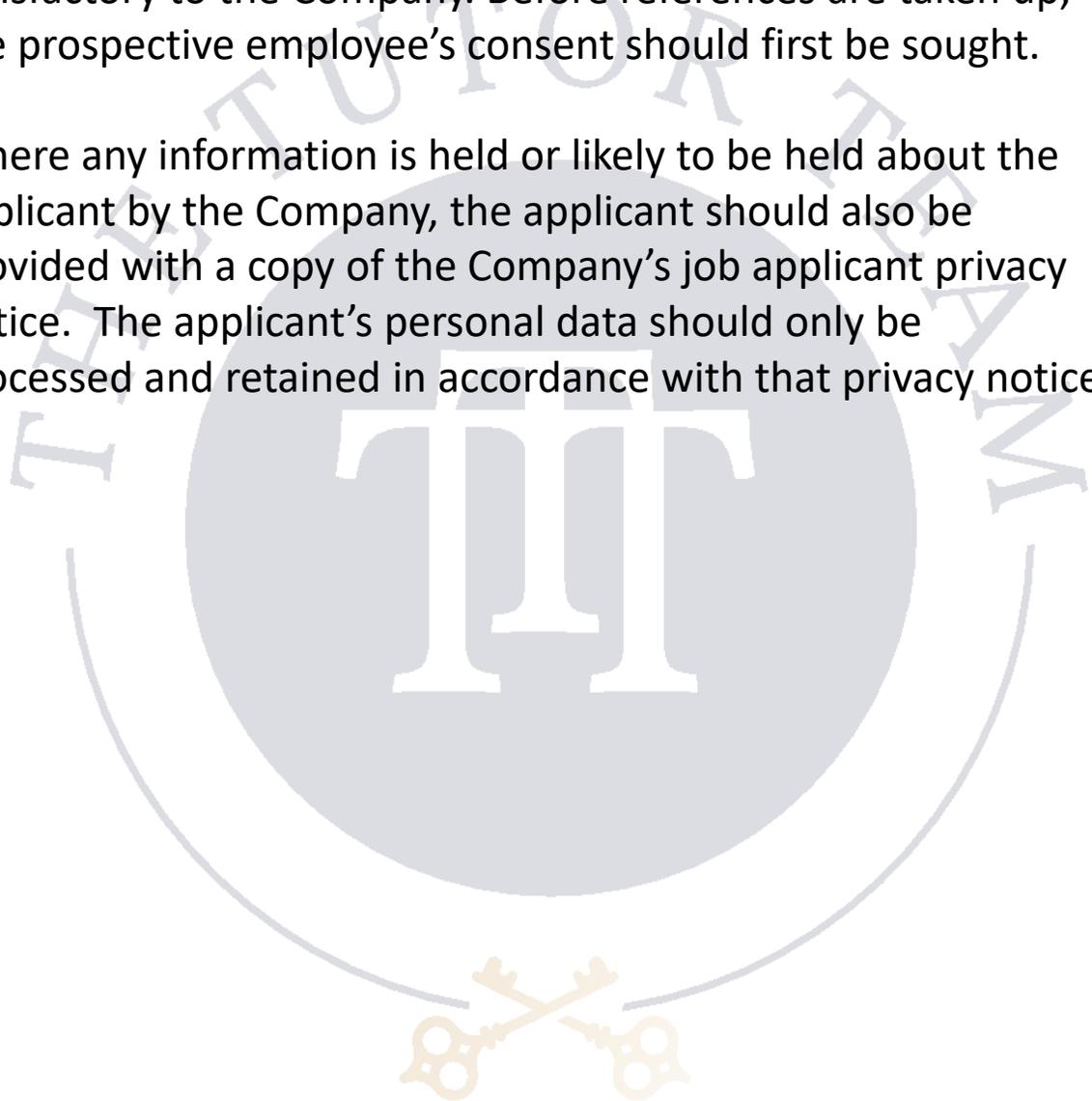
All arrangements for interviews, letters, etc will be the responsibility of Theresa Hill-Smith who will update you regularly on progress.

All interviews must be conducted by at least two managers, or one manager and a member of the Human Resources department.

All offers of employment, whether written or verbal, must have the prior approval of a Director of the Company. On no account should a job offer be made during or at the end of an interview.

It is the Company's policy to seek at least two written references, one of which must be from a previous employer (or, if this is the prospective employee's first job, their school teacher or higher or further education lecturer) and to ask for documentary proof of eligibility to work in the UK. Any offer of employment must be conditional on this documentation being satisfactory to the Company. Before references are taken up, the prospective employee's consent should first be sought.

Where any information is held or likely to be held about the applicant by the Company, the applicant should also be provided with a copy of the Company's job applicant privacy notice. The applicant's personal data should only be processed and retained in accordance with that privacy notice.



COMPANY RECRUITMENT AUTHORISATION FORM

Please attach proposed advertisement wording and details of the medium for publication.

Name:	Department:
Job description/ person specification	
Justification	
Budget information/ implications	
Director's recommendation	
Final approval	YES/NO
Comments	
Signed:	
Date:	
Signed by Director:	
Date:	

WITHDRAWAL POLICY

24 June 2021

Due for Review June 2022

All relevant company policies and procedures are made available to staff in a handbook, and will be available to learners and third parties by request.

1. Cancellation of a booking by the candidate

If a candidate cancels their booking or part of their booking at any time and for any reason, The Tutor Team Ltd will retain the non-refundable deposit payment received and offer a partial refund calculated as detailed in points A, B and C respectively (see below).

Cancellation of a booking may result in money being owed to The Tutor Team Ltd.

A candidate will be considered as having cancelled their booking if it transpires that they are unable to attend for their examinations or practical endorsements due to the imposition of local, regional, or international travel restrictions.

If a candidate cancels the booking and withdraws their entries at any point between the date of registration and the entry deadline, as set by The Tutor Team Ltd, the refund available will be calculated as follows:

The total paid to date by the candidate including the deposit payment minus 20% of the total fee due for the qualification/s or service/s booked

The total paid to date including the deposit payment minus 75% of the total fee due for the qualification/s or service/s booked.

If the calculated refund is negative, then this sum will be due to The Tutor Team Ltd immediately. If payment is not received within 28 days of the cancellation date, we reserve the right to refer the matter to an external debt collection agency.

A candidate may receive a full refund against any fees paid in exceptional circumstances, including occasions when they cannot proceed with the qualification due to an acute medical condition arising, unexpected Armed Forces commitments or if they are required for jury service. Any full refund available will be subject to satisfactory written evidence being received by us in support of the refund application.

Any partial refunds made will be final and will only be made on the strict understanding that the candidate or their parents or guardians will not attempt to increase the refunded amount later.

2. Cancellation of examinations or associated services by The Tutor Team Ltd

We reserve the right to cancel one or more services at any time for any reason. If the decision has been made by The Tutor Team Ltd (and not imposed on us) then we will inform the candidates affected immediately and provide a full refund against the fees paid.

We will not be liable for any compensation or other claims brought by the candidates, their parents', or guardians due to the cancellation. The Tutor Team Ltd will not accept that the cancellation will have a significant effect on the candidate's life-chances, career-development or their acceptance at a university or any other institution.

3. Acts of God, cancellation of examinations and associated services imposed on The Tutor Team Ltd

Should an Act of God arise, e.g. the advent of the Coronavirus pandemic or any other catastrophic event that prevents us from providing one or more services, we will immediately contact all the candidates affected by email, informing them of the situation. Candidates will have until the date set and specified by us to inform us via email whether they wish to withdraw from all services booked and receive a partial refund as calculated below.

The total paid to date by the candidate including the deposit payment minus 50% of the total fee due for the qualification/s or services booked

If the calculated refund is negative, then this sum will be due to The Tutor Team Ltd immediately. If payment is not received within 28 days of the cancellation date, we reserve the right to refer the matter to an external debt collection agency.

Or they can pursue another option, if available. Other options for written examinations may include deferring the booking to the next or subsequent examination series or entering a centre assessed grades process that may generate qualifications in the current examination series. If available, choosing either the deferral or the centre assessed grades process will result in the full fees for the original booking remaining due. Additional fees may be incurred for the centre assessment grades option (if available) to cover the additional work involved in gathering and reviewing the supporting evidence of the candidate concerned.

We will not accept any liability if centre assessment grades (if available) are not generated for a candidate due to insufficient evidence being available. Both the original and any additional fees will remain due.

For the practical endorsements, candidates will have two choices, to withdraw from them and receive a refund as calculated above or defer the endorsements to the following year. The deferral option will result in the full fees remaining due.

If a candidate does not indicate a choice to us by the date set and specified we will automatically defer their entries to the next or subsequent examination series or dates. The full fees will remain due.

Once initiated, candidates will not be able to switch from the deferral to the centre assessment grades process or vice versa.

The Tutor Team Ltd will not be liable for any compensation or other claims brought by the candidates regarding the cancellation of services imposed on us. We will not accept that the cancellation of services will have a significant effect on the candidate's life-chances, career-development or their acceptance at a university or any other institution.

Once initiated, candidates withdrawing from the deferral process or the centre assessment grades procedure will not be entitled to a refund on the fees paid to date or due. Any instalment plan will remain in effect.