

OPERATIONAL POLICIES (Annex 3 to the BSM)

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Note regarding policies for display and external review

Certain policies will be required to be displayed standalone, such as the Health and Safety Policy, or to be sent to external bodies for review. In these cases the policies must be placed onto the display template on page 76. The template must be updated with the correct approval and review dates, and must include a signature from the relevant company director.

Contents

¹ The Health and Safety Policy needs to be displayed in College premises by statutory requirement,as such it is formatted for display by default.

OLC (Europe) Ltd Grievance Policy

Policy Contents

1. Introduction
2. Informal Discussions
3. Stage 1
4. Stage 2
5. Stage 3
6. Policy Monitoring and Review

1. Introduction

OLC (Europe) Ltd will ensure that employees and/or OLC students on placement with a grievance relating to their employment/placement have access to this policy helping them to resolve their grievances as quickly and as fairly as possible.

2. Informal Discussions

If you have a grievance about your employment/placement you should discuss it informally with a Director of the company. We hope that the majority of concerns will be resolved at this stage.

3. Stage 1

If you feel that the matter has not been resolved through informal discussions, you should put your grievance in writing to the Director of Marketing, MIS and Infrastructure. If your grievance relates to the Director of Marketing, MIS and Infrastructure, your grievance should be put in writing to another Director of the company. The Director will give a response within 5 working days in an endeavour to resolve the matter.

4. Stage 2

If the matter is not resolved, you may raise the matter again, in writing, with the Director who you wrote to, who will meet with you to give you a response within 5 working days. You may be represented or accompanied at this meeting by a fellow worker of your choice or respective student representative.

5. Stage 3

If the matter is not resolved to your satisfaction, you should put your grievance in writing to the Principal or an authorised deputy. You will be entitled to have a meeting with the Principal or his/her authorised deputy to discuss the matter. The Principal or authorised deputy will give his/her decision within 7 working days of the grievance being received.

The Principal's decision is final.

6. Policy Monitoring and Review

This policy is monitored in order to ensure that it remains relevant. Full review of the policy occurs annually.

This version of the Grievance Policy was approved on: 15/01/2016

Last review: 22/02/2023. To be reviewed: 28/02/2024

OLC (Europe) Ltd Equal Opportunities Policy

Policy Contents

1. Introduction
2. General Principles
3. Managers responsibilities
4. Responsibilities of all Employees and Students
5. Policy Monitoring and Review

1. Introduction

This policy seeks to ensure that the talents and resources of employees and OLC students are utilised to the full and that no applicant, employee or student receives less favourable treatment of the groups of gender, marital status, sexual orientation, social class, race, ethnic origin, colour, nationality, national origin, religion, disability, age, or gender re- assignment or is disadvantaged by working conditions or requirements which are not relevant to job performance.

2. General Principles

As a responsible employer OLC (Europe) Ltd will;

- Recognise its legal obligations under the current Equalities Act, the Employment Rights Act, the Employment Relations Act, and the Maternity and Parental Leave Regulations.
- Review periodically its recruitment criteria and policies.
- Ensure all employees are given equal opportunity in training and development to enable progression within the organisation.
- Distribute and publicise this policy throughout the organisation and elsewhere as appropriate.
- Enable employees and OLC students who believe that they have been unfairly treated to pursue the matter through the OLC (Europe) Ltd Equal opportunities Policy.
- Investigate any complaint of discrimination from members of the public seeking employment with OLC (Europe) Ltd.

3. Managers Responsibilities

Managers will be responsible for the practical application of the Equal Opportunities Policy and in particular should ensure that:

- All employees and OLC students working on placement are aware of their responsibilities according to legislation, relevant codes of practice and this Equal Opportunities policy.
- Employment decisions are not discriminatory.
- Proper records of employment decisions are maintained.
- Fair standards of employment practice are maintained

4. Responsibilities of all Employees and Students

All employees and OLC students working on placement have a responsibility for ensuring that they do not unlawfully discriminate during the course of their employment/placement. They must;

- Comply with this Policy and their responsibilities in relation to OLC (Europe) Ltd colleagues and customers.
- Adhere to and give support to any measures introduced to ensure equal opportunity.

- Not themselves discriminate, e.g. as supervisors or managers responsible for selection decisions in recruitment, promotion, transfer, training etc.
- Not themselves discriminate in applying conditions of employment.
- Not induce, or attempt to induce, other employees or unions or management to practice discrimination.
- Not victimise or attempt to victimise individuals on the grounds that they have made complaints or provided information on discrimination.
- Not harass, abuse or intimidate other employees, e.g. in attempts to discourage them from continuing their employment.

5. Policy Monitoring and Review

This policy is monitored in order to ensure that it remains relevant. Full review of the policy occurs annually.

This version of the Equal Opportunities Policy was approved on: 15/01/2016

Last review: 22/02/2023. To be reviewed: 28/02/2024

**OLC (Europe) Ltd
Corporate Social Responsibility (CSR) Policy**

Policy Contents

1. Introduction
2. Purpose
3. Scope
4. Responsibilities
5. Corporate objectives
6. Underlying Philosophy
7. Policy Monitoring and Review

1. Introduction

OLC (Europe) Ltd, as a member of the international business community, recognises its corporate social responsibility commitments in its various roles, which include education and trainer, adviser and consultant, researcher and knowledge creator and employer and consumer. We reflect these commitments within this CSR policy and in a family of policies and statements.

- Our Vision, Mission, Goals
- Strategic Plan
- Quality Plan
- Health and Safety Policy
- Disability strategy
- Environmental and Sustainability Policy
- Humanitarian & Charity Policy
- Workforce Policies (Contained in our staff handbook)
- Equal Opportunities Policy
- Annual Leave Policy
- Grievance Policy
- IT Policy
- Disciplinary Policy

We recognise that our businesses activities have direct and indirect impacts on the societies in which we operated. We endeavour to manage these in a responsible manner, believing that sound and demonstrable performances in relation to corporate social responsibility, policies and practices are a fundamental part of our business success.

We are committed to continuous improvement in our corporate social responsibility programme, which is part of our strategic plan, and encourage our business partners to strive for matching performance.

Our performance will be periodically reviewed and externally verified to help us meet our vision, mission and goals outlined in our Business System Model. At a process level, process owners will review progress at least annually.

2. Purpose

The purpose of the policy is to make clear to all stakeholders what we mean by corporate social responsibility and how we propose to work towards achieving it. The policy includes simple summary statements drawn from fuller policies on these topics, which, in our opinion, constitute corporate social responsibility. The policy provides stakeholders with a statement of our commitments under a family of corporate social responsibility policies.

3. Scope

The corporate social responsibility policies applies throughout the OLC (Europe) Ltd group and operations and governs out approach to all our activities. Governance of our approach to business is demonstrated within the OLC (Europe) Ltd Business System Model.

4. Underlying Philosophy

OLC (Europe) Ltd believes that a responsible approach to developing relationships between companies and the communities they serve, global or local, is a vital part of delivering business success. How we interact with the world in which we operate determines our place within it. This statement of corporate social responsibility represents a first step into defining OLC's view and will be developed over time. Our philosophy is encapsulated in our Vision, Mission and Goals detailed in the business system Model.

5. Corporate objectives

To provide a reference point to guide employees and stakeholders on the values which drive the conduct of our business and relationships with the world we operate we develop corporate objective each year at the annual review. That annual review results in development and publication of strategic plan, which is the guiding force for our operations.

6. Responsibilities

The Managing Director is the main board director with primary responsibility. Stakeholders, particularly employees, are invited to provide feedback on the nature and operation of the corporate social responsibility statement

7. Policy Monitoring and Review

This policy is monitored in order to ensure that it remains relevant. Full review of the policy occurs annually.

This version of the Corporate Social Responsibility was approved on: 15/01/2016

Last review: 22/02/2023. To be reviewed: 28/02/2024

Health and Safety Policy Statement

Health and Safety at Work Act 1974

This is the Health & Safety Policy Statement of

OLC (Europe) Ltd

As a responsible employer and educator it is our policy to:

- provide adequate control of the health and safety risks arising from our work activities and teaching activities
- consult with our employees, associates and students on matters affecting their health and safety
- provide and maintain safe plant and equipment
- ensure safe handling and use of substances
- provide information, instruction and supervision for employees, students, trainees and those in our care
- ensure all employees are competent to do their tasks, and to give them adequate training
- prevent accidents and cases of work related ill health
- maintain safe and healthy working conditions
- to review this policy as necessary and at regular intervals.

Signed:



Dr Chris Bamber

1st Issued Date: 13th Nov 2006 **Date Reviewed:** 22nd Feb 2023 **Next Review Date:** 28th Feb 2024

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Registered Company Number 4420134

Vat Registration Number 713709541

Responsibilities

Overall and final responsibility for health and safety is that of Dr Chris Bamber and Mr. Y Motara is the appointed person for Health and Safety in the workplace.

To ensure that health and safety standards are maintained and improved the following people have responsibility in the following areas:

Name	Responsibility
C Bamber & Y Motara	Policy setting and reviewing
Y Motara	Premises
J Semmens	Student Welfare and Safety
Programme Managers	Induction of Students, Associates and Employees
Line Managers	Induction of Associates and Employees
Y Motara	Fire Safety Risk Assessment, Evacuation Procedures

All employees, associates and students must:

- co-operate with supervisors and managers on health and safety matters
- not interfere with anything provided to safeguard their health and safety
- take reasonable care of their own health and safety ; and
- report all health and safety concerns to an appropriate person – as detailed within this document.

Health and Safety risks arising from our work activities

Risk assessments are required for all activities undertaken at OLC (Europe), including student teaching, and activities carried out away from site, such as consultancy, off-site training, OLC trainee placement and field trips. Risk assessments will mainly be undertaken by Les Harvey, Joe Turner and Yunus Motara [particularly fire risk assessments] and other trained risk assessment personnel.

The findings of risk assessments will be reported to Dr C Bamber.

Action required to remove or control risks will be approved by Dr C Bamber.Y

Motara will be responsible for ensuring that action required is carried out.

Dr C Bamber will check that the implemented actions have removed or reduced the risks.

Assessments will be reviewed every year, or when work activity changes, risk is realised or knowledge improves, whichever is soonest.

Consultation with employees & students

Employee representatives are:

Julie Semmens

Consultation with employees is provided by:

Weekly ASM meetings and at monthly management review meetings.

Julie Semmens is responsible for the management of student welfare and safety. Students will be encouraged to nominate their own representative.

Safe plant and equipment

Y Motara will be responsible for all identifying all equipment and/or plant requiring maintenance.

Motara will be responsible for ensuring effective maintenance procedures are drawn up.

Dr C Bamber will be responsible for ensuring that all identified maintenance is implemented. Any problems with plant/equipment should be reported to Y Motara

Y Motara will check that new plant/equipment meets health and safety standards before it is purchased.

PAT testing of equipment will be carried out by competent personnel under the guidance of Dr Chris Bamber. Paul Bamber, Joe Turner has been trained and is competent to carry out PAT testing

Safe handling, storage and use of substances

Y Motara will be responsible for identifying all substances which need a COSHH assessment.

Motara will be responsible for undertaking COSHH assessments.

Dr C Bamber will be responsible for ensuring that all actions identified in COSHH assessments are implemented.

Y Motara will be responsible for ensuring that all relevant employees are informed about COSHH assessments.

Y Motara will check that new substances can be used safely before they are purchased.

Assessments will be reviewed every twelve months or when the work activity changes, whichever is soonest.

Information, instruction and supervision

The Health & Safety law poster is displayed in the main corridor.

Health and Safety advice is available from M Mann.

Supervision of young workers and trainees will be arranged/undertaken/monitored by Julie Semmens.

Dr C Bamber is responsible for ensuring that our employees working at locations under the control of other employers are given relevant health and safety information.

Employees, associates and trainees working at locations under the control of other employers must follow the host employer systems and procedures, except where the OLC (Europe) risk assessments specify more stringent controls.

Competency for tasks and training

Induction training for all employees will be provided by completed by Line

Managers Job specific training will be provided by:

Job	Trainer
Laboratory technician and laboratory working practices	Dr Chris Bamber

Training records are kept on CORE11

Training requirements will be identified/arranged/monitored by: Dr C Bamber

Accidents, first aid and work related ill health

First aid supplies are kept in the front office, staff kitchen and workshop.

The day to day management, first aiders and fire marshals rota are displayed at the Campuses and reviewed Termly. A list of Qualified First Aid and Fire Marshals at Work persons can be found on the Infrastructure Teams site. C

All accidents, and cases of work related ill health are to be recorded in the accident book, which is kept in the front office. This applies to all employees, associates and trainees, regardless of work location.

Dr C Bamber is responsible for RIDDOR reporting.

Monitoring

To check our working conditions, and to ensure our safe working practices are being followed, we will carry out inspections and audits as detailed in our ISO audit schedule.

Y Motara will be responsible for investigating all accidents, near misses and cases of work related ill health with the intention of avoiding a recurrence.

C Bamber is responsible for acting on the results of the above investigations.

Regular risk assessments are carried out to a predefined schedule and when changes to premises, plant, equipment or operations are made.

Emergency procedures – including fire

Y Motara is responsible for ensuring that the fire risk assessment is undertaken and implemented. He will be supported by Chris Bamber and guided by Mick Mann using the HM Government “Fire Risk Assessment: educational Premises” publication ref: 05 FRSSD 03338.

Escape routes are checked by Joe Turner and Ben Walker, every week.

Fire extinguishers are maintained and checked by Walker Riskas Fire Protection or other qualified personnel, every 12 months.

Fire safety awareness training is mandatory for all employees and fire marshal training is available to interested employees.

Daily appointed fire marshal, first aider and office manager is shown in the front lobby reception area of 66 Castle Street, Bolton, BL1 2AE.

Daily appointed fire marshal, first aider and office manager is shown in the front lobby reception area of Montague House, Mathews Street, Ardwick, Greater Manchester, M12 5BB.

Regarding Manchester Premises

All points, apart from those addressed below, follow the policy statement above.

The Manchester campus' main address is: Montague House, Mathews Street, Ardwick, Greater Manchester, M12 5BB

Information, instruction and supervision

The Health & Safety law poster is displayed in the main reception area.

Accidents, first aid and work related ill health

First aid supplies are kept in the reception office, staff kitchen and the workshop. The

appointed person for office-based work is Kelly Haslam

Qualified First Aid at Work persons are: Chris Bamber, Sarah Moraes, Julie Semmens, Laki Syeda, Waseema Salehuddin, Olutunde Akingbehin, Mohammed Rahman, Rafeed Hassan, Enock Tsapayi, Kelly Haslam, Hollie Burgess, Liam Pepperell and Paul Bamber

Appointed First Aid Representatives are: Hollie Burgess, Rafeed Hassan, Laki Syeda, Waseema Salehuddin, Olutunde Akingbehin and Mohammed Rahman.

All accidents, and cases of work related ill health are to be recorded in the accident book, which is kept in the reception office. This applies to all employees, associates and trainees, regardless of work location.

Emergency procedures Manchester and Bolton campus – including fire

List of Appointed fire marshals can be found on the Infrastructure Teams site

Amendments

Date of amendment	Description of changes
01/05/2023	Updated: Appointed fire marshals are updated termly for all Campuses
22/02/2023	, Updated Appointed fire marshals are: Sarah Moraes, Julie Semmens, Jane Kear and Yunus Motara.
22/02/2023	and . Updated: Appointed First Aid Representatives are: Hollie Burgess, Rafeed Hassan, Laki Syeda, Waseema Salehuddin, Olutunde Akingbehin and Mohammed Rahman.
22/02/2023	Updated qualified first aid persons list: Chris Bamber, Sarah Moraes, Julie Semmens, Laki Syeda, Waseema Salehuddin, Olu Akinbehin, Mohammed Rahman, Rafeed Hassan, Enock Tsapayi, Kelly Haslam, Hollie Burgess, Liam Pepperell and Paul Bamber
22/02/2023	Removed Katie Smith and Charlene Pattison from all responsibilities
18/02/2021	Added Luca Mihaila, Sarah Moraes, Charlene Pattison, Jane Kear and Paul Bamber
18/02/2021	Removed C Bateman responsibilities
20/03/2020	Removed M Milaszewicz responsibility for Personnel responsibilities and replaced with J Semmens
20/03/2020	Removed J Saunders, Simon Nuttall-Worral, Ashley Eubank responsibility for H&S, fire safety risk assessments and replaced with G Paton
28/03/2019	Added J Saunders responsibility for fire safety risk assessments
28/03/2019	Removed EETEC Ltd from text
28/03/2019	Added Montague House premises and removed Express Network premises
28/03/2019	Removed Ms. Peacock responsibilities

13/01/2015	Removed Pam Simpson responsibilities and changed to Mark Milaszewicz
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13/01/2015	Removed Pam Simpson responsibilities and changed to Mark Milaszewicz
13/01/2015	Added Daniel Russell and Chris Bateman as competent in PAT testing
13/01/2015	Moved Manchester Premises information into main document
13/01/2015	In emergency procedures section 'suing' changed to 'using'
13/01/2015	Responsibilities of Ronan Carolan changed to Jane Kear
28/09/2015	Responsibilities for E Bamber and D Riley distributed to other persons
28/09/2015	Word trainee changed to student on page three
28/09/2015	List of first aid persons changed to reflect qualified persons list

END OF DOCUMENT

**OLC (Europe) Ltd
Fire Safety Policy**

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Director of Student Experience and Enhancements
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Chapter 6 Fire Safety Policy Review

Fire Safety Policy

1. Introduction

This fire safety policy has been prepared by The Managing Director as the responsible person for the premises occupied by OLC (Europe) Ltd and OLC (College) Ltd and referred to in this document as the College to comply with The Regulatory Reform (Fire Safety) Order 2005.

The purpose of this policy is to ensure the safety from fire of all relevant persons on, in or in the vicinity of the premises by effective planning, organisation, control, monitoring and review of the preventive and protective measures.

This policy will be used to ensure the provision of suitable and sufficient general fire precautions, assessment of risk and management of necessary fire safety arrangements.

The College is committed to providing a safe environment for its staff, students and visitors. Part of this safety responsibility is in the provision and management of fire safety systems and procedures. All members of the College, their visitors and contractors, have a statutory responsibility in ensuring compliance with the law and complying with the fire safety provisions defined within this policy.

Fire is recognised as a major threat to the activities of the College. An outbreak of even a small fire creates risk to both life and property, damage to the environment and may compromise our normal business activities.

The College will ensure, so far as is reasonably practicable, that the risk associated with fire will be managed in compliance with the Regulatory reform (Fire Safety) Order 2005, and any other relevant legislation that may impact upon it.

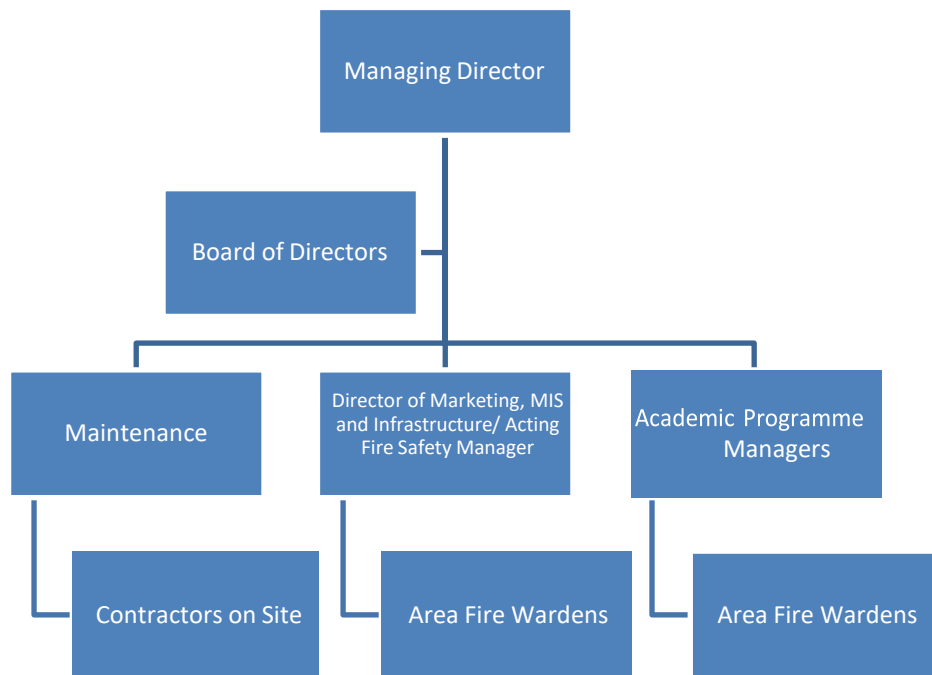
The aim of this policy is, therefore, to provide a robust fire safety framework which will be implemented to secure the safety and wellbeing of everyone within the College Community and to protect the College's assets.

2.1 Management Responsibility

This Fire Safety Policy applies to all premises and activities falling, to any extent, under the College's control. The policy sets down the framework by which the College and all members of the College's community are expected to undertake their relevant duties. The main responsibility for statutory compliance with the Regulatory Reform (Fire Safety) Order 2005 is held by the College with the management and supervision of the regulations devolved via the Managing Director to the relevant Directors and Management Team, who will ensure that the requirements of the duty holder's responsibilities in respect of the undertakings required to meet compliance with the Regulatory Reform (Fire Safety) Order 2005 Regulations are diligently met.

The term "Directors and Management Team" has been used to refer to those in such positions. This term should be taken to include all Directors, Heads of Academic Programmes and those who lead within College Maintenance Services within any relevant premise. The Regulatory reform (Fire Safety) Order 2005 requires each employer and person who has control of a relevant premise, to any extent, to carry out an assessment of the premises to identify any risks to the safety of relevant persons in respect of harm caused by fire and to take all reasonable fire safety measures to ensure the safety of relevant persons within the relevant premise. The following Fire Safety Management diagram details the managerial delivery process to ensure all fire safety

provisions are maintained. This reflects the normal line management arrangements within the College.



To allow this statutory provision to be undertaken the Director of Student Experience and Enhancements, Director of Marketing, MIS and Infrastructure, Academic Programme Managers, Area Fire Wardens, the Maintenance and reception Staff, all staff and students will be responsible for;

2.2 Duties of the Director of Marketing, MIS and Infrastructure

Ensuring arrangements are made in respect of the maintenance of fire safety provision for the relevant premise - this will include;

- i) Fire warning and detection systems are maintained in accordance with the relevant standard
- ii) Firefighting equipment, including fixed installations and specialist systems, are subjected to a maintenance programme in accordance with the manufacturer's guidelines
- iii) Means of escape are maintained as required
- iv) Emergency lighting, escape lighting and signage are maintained and tested in accordance with the relevant standard
- v) Electrical installation tests are undertaken as required.

Ensuring that any recommendations from risk assessment reviews, relevant to areas of responsibility, are responded to diligently. Liaising with the Director of Marketing, MIS and Infrastructure, Maintenance and Fire Wardens on all matters likely to impact on the Fire Safety provision for the relevant premise. Ensuring that all works undertaken by contractors, relevant to areas of responsibility, are supervised and where "hot works" are to be carried out, that the appropriate approval is completed.

2.3 Duties of the Director of Marketing, MIS and Infrastructure

To ensure that an Area Fire Wardens (AFW) are appointed to assist with the fire safety provision. Ensure that the AFWs are supported by operational staff when necessary. Ensure that any recommendations from risk assessment reviews, applicable to area of responsibility, are carried out diligently. Ensure that all staff receive fire safety training on induction and at regular intervals thereafter. Ensure that adequate records are maintained in relation to;

- i) Storage and use of dangerous substances (DSEAR & COSHH)
- ii) Fire Alarm testing (weekly)
- iii) Fire Alarm maintenance (annually)
- iv) Emergency lighting tests (weekly)
- v) Fire Incident Reports
- vi) Fire Drill and Evacuation tests (twice-annually)
- vii) Maintain the Building Fire Safety Information Book (grab bag)
- viii) Electrical portable appliance tests
- ix) Staff fire safety training

Note: The Fire Safety Information Book is intended to be a single file to record all necessary fire safety provisions within the relevant premise. It will include a plan of the building; location of utilities cut-offs; emergency contact list; copies of the Fire Risk Assessment, Fire action plans, records of all tests carried out on the fire safety equipment and record all drills and training provisions applicable to the building and staff.

To ensure that the appropriate statutory licenses are applied for and renewed where necessary. Ensuring that all works undertaken by contractors, relevant to areas of responsibility, are supervised and where “hot works” are to be carried out, that the appropriate approval is completed. To liaise with the Managing Director on all relevant matters likely to impact on the fire safety provision for the relevant premise. Proactively monitor waste and waste storage ensuring it is stored away from buildings and within designated containers.

2.3.1 Duties of Academic Programme Leads

Academic Programme Managers are part of the senior management structure of the College and have management responsibility to ensure that they;

- Have received fire safety and fire awareness training
- Know who the daily appointed Area Fire Wardens are
- Ensure housekeeping is managed properly and appropriately
- Have knowledge of any student with disability or impairment that may be effected by evacuation
- Are aware of the evacuation and fire safety plans
- Report any incident, concern or issue relating to fire safety management immediately to the Director of Marketing, MIS and Infrastructure or the Director of Student Experience and Enhancements.

2.4 Duties of Director of Marketing, MIS and Infrastructure Acting as Fire Safety Manager;

Support the Board of Directors and Academic Leads, to meet, deliver and maintain statutory fire safety obligations. Support the Area Fire Wardens in their role and provide adequate training to maintain competence. Ensure initial Fire Risk Assessments are carried out for all new premises as soon as is practicable. Ensure Fire Warden and Fire Awareness training programme are provided as required. Review all fire safety risk assessments as necessary in accordance with Table 1. Provide liaison and support on all matters relating to fire safety provision within the University estates. Liaise with Local Authority Fire and Rescue Service (FRS) on all statutory fire safety matters. Ensure all fire incidents are investigated and monitor all calls to the FRS.

2.5 Duties of the Fire Warden

Fire Warden training is provided by the College to all staff and contract teaching staff and warden duties include;

- i) To be familiar with all exit routes from the building in which they normally work
- ii) To advise others on exit routes
- iii) Drawing the attention of the Director of Marketing, MIS and Infrastructure, Local Health and Safety Committee or the Maintenance to any deficiency or obstruction on these routes
- iv) Instruct personnel in the area in which they find themselves to vacate the building pausing only to make any equipment safe
- v) Guide personnel along exit routes and help those whose routes are obstructed to find alternative routes
- vi) Instruct personnel outside the building to clear the approach roads and to congregate in the recognised assembly areas and not to re-enter the building until so instructed by a senior Fire and Rescue Service Officer
- vii) Should any person refuse to co-operate with the Fire Warden, to warn such persons and note the incident for reporting to the Head of Unit
- viii) Report the successful evacuation of their area of responsibility to the Senior Staff Member present who is responsible for evacuation.

2.6 Duties Relevant to Staff and Students

Staff and students have a responsibility to comply with the Fire Safety Policy. This will include, but not be limited to:

- Adhering to the housekeeping rules thus ensuring a good housekeeping culture is fostered
- Observing all instructions, information and training intended to secure fire safety
- Co-operating with the College on all matters relevant to fire safety
- Not interfering with any building fabric or equipment provided in connection with assuring fire safety
- Reporting any obvious defects or short-comings in College fire safety provision, arrangements or procedures

Note: Failure to comply with the requirements of this policy could result in disciplinary action being taken.

2.7 Duty of Maintenance and the Management of Contractors

The maintenance team led by the Director of MIS, Infrastructure, Quality & Standards shall ensure that good housekeeping is maintained at all times; to ensure that waste is managed correctly, safely and efficiently at all times, see section 5.6 of this policy.

Where contractors are on site it will be the duty of Maintenance team member with the responsibility for the works undertaken by them, to ensure the appropriate level of fire safety provision is incorporated within any work schedule, contract agreement or risk assessment and where such works are likely to impact on the existing fire safety provision notification must be communicated to the Fire Safety Manager for his/her consideration. Contractors will also require to be made aware of the Fire Action Plan relevant to the area they are working in or are likely to attend. Where any work undertaken that is likely to involve the application of a naked flame or mechanically induced heat source a "Hot Work Permit" must be acquired and agreed prior to the commencement of such works.

2.8 Visitors and Responsibility of Reception Staff

Members of the public or other visitors are required to be advised of the evacuation plans for any relevant premise they access. To ensure this is accomplished adequate "Fire Action Notices" are required to be displayed at prominent locations, see section 4.6 of this policy. Visitor signing in sheets shall be managed in such a way as to ensure that staff can account for all visitors within the premises at any given time to ensure safe evacuation.

Reception staff must ensure that fire wardens are appointed each day and recorded on the information board in the reception area.

2.9 Calling the Fire and Rescue Service

Where a fire is detected by automatic fire detection, the alarm will be raised automatically via an integrated fire safety system. However, in the unlikely event that this does not occur, assistance can be sought by calling College Central Services Security on 01204 525511. Where College Central Services Security receive a call confirming a fire via an internal or exchange telephone call, they will require to ascertain the exact address and the location of the caller and immediately dial 999 requesting assistance as required noting the time that the call was received. Where an activation is received via the automated Fire Alarm System at the Central Services Security main fire alarm panels, the duty officer shall immediately dial 999, request the attendance of the Fire and Rescue Service, informing the operator of the exact address, location and an indication of the nature of the call.

2.10 Personal Emergency Evacuation Plan (PEEPS)

Where there is a requirement for assistance by any person to evacuate any relevant premise during an emergency a PEEPS application will be required. Students or staff, who may require assistance to

evacuate, should discuss their concerns and needs with their academic course lead, line manager or supervisor, as applicable, so that any necessary individual arrangements can be put in place in advance. The Director of Marketing, MIS and Infrastructure should consider the arrangements that may be required to assist visitors with physical impairments in their area where evacuation becomes necessary.

3 Fire Safety Training

3.1 Statutory Requirements

The Regulatory Reform (Fire Safety) Order 2005, requires an employer to ensure that his or her employees are provided with adequate fire safety training. To comply with this statutory requirement the Director of Marketing, MIS and Infrastructure shall ensure that all employees within their management control receive regular fire safety training and all new employees undertake fire safety training as soon as is practicable after commencement of employment.

All staff will be made aware of the Fire Action Plan (Fire Safety Notice).

Account must also be taken of circumstances that may impact on fire safety provision such as the introduction of new work equipment, new technology, new or changed risks etc;

Where young persons (under the age of 18) are employed, either full time or on a summer intake or part time basis, account must be taken of their lack of awareness, inexperience and immaturity when assessing work based tasks and the impact this may have on fire safety arrangements.

3.2 Staff Fire Safety Training

All new employees must to be informed of the fire safety provisions that are relevant to the workplace. The line manager is responsible for ensuring that arrangements are made to ensure new employees are advised of the following;

- Fire action arrangements, including the Fire Safety Policy
- Means of escape within the premise
- Location of fire exits
- Location of firefighting equipment
- Details in relation to relevant findings of the fire risk assessments and dangerous substances
- On line fire safety training

The College's on-line fire safety training course is available within Moodle. All staff are required to access the on-line facility and complete the course on a minimum 3 yearly basis; staff can access the course as often as they wish, however, the confirmation assessment must be completed by all staff at least once every 3 years. The online course lasts for approximately 40 minutes and includes the following topics;

- General fire safety awareness
- Means of escape

- Fire extinguisher awareness
- Relevant fire safety risk assessments
- Raising the alarm and personal safety

All staff shall also under-go fire warden training but are not expected to take on the role of appointed area fire warden. Appointed fire warden roles are allocated to those staff that wish to participate in the role and that have received adequate training.

3.3 Area Fire Wardens

In the case of Area Fire Wardens, training will be provided on a 3 yearly basis and will include;

- Legislative requirements
- Fire safety principles
- Record keeping
- Local emergency plans

Additional Fire Warden training will be provided as and when deemed necessary. Notwithstanding the requirement as dictated by demand, the maximum period for refresher training should not exceed 3 years. The wardens training will include safe evacuation and zone clearance procedures as well as detailed fire safety guidance.

4. Fire Safety Provision

4.1 Fire Safety Risk Assessment

The main purpose of the fire safety risk assessment process is to ensure that a methodical and structured approach is applied to assessing the suitability and effectiveness of the fire safety provisions applicable to a relevant premise and the fire hazards within. The Regulatory Reform (Fire Safety) Order 2005 places a statutory duty on each employer to carry out an assessment of the workplace for the purpose of identifying any risks to the safety of the employees, students, visitors and others in respect of harm caused by fire. The Regulatory Reform (Fire Safety) Order 2005, detail the arrangements that are required and include specific directions for;

- Fire safety arrangements
- Elimination or reduction of risks from dangerous substances (ERIC)
 - **Eliminate**
 - **Remove**
 - **Isolate**
 - **Control**
- Means for fighting fire and means for giving warning in event of a fire
- Means of escape
- Procedures for serious and imminent danger from fire
- Maintenance arrangements

- Safety assistance
- Information for employees
- Training

To facilitate the risk assessment process all relevant premises within the College's estate will be categorised based on the risk posed to life and property. The property will be assessed in accordance with the categorisation shown in Table 1. Additionally, risk assessments must be reviewed on a regular basis and whenever any material changes are likely to impact on the fire safety provision. Risk assessments will be completed for all relevant premises and reviewed in accordance with the target frequency shown in column 3 of the table 1.

Risk Category	Building Name	Fire Risk Assessment Review Frequency
Moderate	66 Castle Street, Bolton Campus	Annually
Moderate	Montague House, Greater Manchester Campus	Annually
Moderate	Unit 450, Chambers Business Centre, Chapel Road, Oldham, OL8 4QQ	Annually

Table 1: Fire Risk Assessment Frequency

Fire risk assessments and reviews will be the responsibility of the Director of MIS, Infrastructure, Quality & Standards Acting Fire Safety Manager. Where necessary a report will be produced with specific recommendations for the improvement of fire safety provision within the relevant premises concerned. These will include actions required to be undertaken by Maintenance for the building (e.g. improving housekeeping) as well as actions which will possibly require structural modifications to the buildings which will be the responsibility of the Director of MIS, Infrastructure, Quality & Standards. These recommendations will be prioritised in terms of urgency of action P1 – P2, with P1 having the highest priority. Notification of the risk assessment findings will be forwarded to the Managing Director and the Board of Directors as well as the Director of Marketing, MIS and Infrastructure. A copy of the fire risk assessment for every building must be held within the Fire Safety Information Book for viewing by any relevant person.

4.2 Emergency Procedures

In consultation with the Fire Safety Manager, where required, AFWs will ensure that two fire evacuation drills are carried out per annum, during semesters and when the buildings are occupied. It is accepted that drills should be avoided during times, such as exams and conferences, however, consideration should be given to ensuring advantage is taken of peak occupancy times and ensure that all fire exits are utilised.

4.3 Dangerous Substances

The impact of dangerous substances when exposed to fire can create a hostile and unpredictable environment. Where such substances are stored and used within the College particular attention should be given to the safe use and storage guidance supplied with the substance's Safety Data Sheet. Students and employees should only be exposed to dangerous substances in an appropriately controlled and supervised environment.

4.4 Dangerous Conditions (Fire Safety)

Where in the opinion of any student or member of staff a dangerous condition exists, that is likely or has the potential to compromise the safety of any person in the event of fire, the condition should be brought to the attention of the relevant Area Fire Warden. In the first instance, the Area Fire Warden should investigate the concerns and where necessary implement the appropriate means to negate the risk or contact the Director of Marketing, MIS and Infrastructure / Fire Safety Manager to seek assistance. Where the AFW cannot resolve the concern they must bring the matter to the attention of the Fire Safety Manager as soon as is reasonably practicable.

4.5 Alarm Activations and Incident Reports

In the event of a fire or an alarm activation within a relevant premise, the Fire Incident Form must be completed by the Director of Marketing, MIS and Infrastructure. This process enables the Director of Marketing, MIS and Infrastructure / Fire Safety Manager to be aware of all incidents where the Local Authority Fire and Rescue Service has been summoned to the College, but more importantly allows for investigations to be carried out where necessary. Where a small fire has occurred and was subsequently extinguished without activating the fire warning system, an incident report must still be completed and forwarded to the Fire Safety Manager. In such circumstances the incident must be reported to their line manager who will then arrange for the report to be completed.

4.6 Unwanted Fire Alarm Signals (UFAS)

Unwanted fire alarm signals are activations of the fire warning system that are activated by any effect other than fire. These signals ultimately have a negative effect on the College's core business and also encourage complacency, as well as eroding user confidence. It is the intent of the College to strive towards zero tolerance of UFAS whilst recognising the importance of fire detection systems in protecting staff, students, visitors and the build environment from the effects of fire.

4.7 Fire Action Plans (Fire Action Notices)

Fire action notices are located at various points within all relevant premises detailing the relevant information from the fire action plans.



All employees are required to be familiar with these notices as well as the detail within the fire action plans. Each notice will clearly indicate the following;

- The type of audible sounder within the relevant premise
- The location of the assembly point
- Simple guidance on actions to be taken.

Fire action plans require adaptation to accommodate all known hazard or risk that are likely to impact on evacuation. These will include details of isolation procedures for processes and equipment as well as information sharing with the fire and rescue service when in attendance. The fire action plan will also detail the relevant evacuation procedures that are to be adopted for persons with impairments. The Director of Marketing, MIS and Infrastructure / Fire Safety Manager must be consulted prior to implementing a Fire Action Plan.

5. Fire Safety Management

All of the College's premises have a number of fire safety provisions incorporated within them. These provisions are often referred to as either an active provision, examples of which can be fire safety systems and smoke extraction, or a passive provision, examples of which can be fire doors or intumescent treatments etc.,. Irrespective of the provision it is necessary to recognise the importance of such features and ensure that their function is not compromised, as to do so will ultimately impact on the operational capability of the provision and ultimately affect the safety of occupiers and the integrity of the building itself.

5.1 Fire Doors

Fire doors are doors that are designed to restrict the spread of fire and the products of combustion within a predicted time period and will normally feature a self-closing device. All fire doors are marked as a fire door and should be kept closed at all times. The use of wedges and other items as hold open devices is not permitted within any of the College's premises and must be positively discouraged.



The use of electromagnetic hold open devices on fire doors may be considered in some instances. Where such devices require to be considered it may impact on the fire safety provision, therefore, full consultation with the College's Fire Safety Manager will be required.

5.2 Exit Routes

All exit routes are indicated by signage. To ensure exit routes are not compromised, no equipment or materials may be accommodated or stored within any protected exit route or protected stair enclosure.



All exits must be maintained clear, free from any obstruction and all final exit doors are required to be easily and immediately open-able from the direction of travel. Additionally, the surface finish to wall linings within stair enclosures and protected routes should be maintained free from any form of combustible wall decorations. Notice boards will be accepted in such areas as long as they are enclosed and effectively managed. Corridors and stairways that form part of escape routes should be kept clear and hazard free at all times. Items that may be a source of fuel or ignition should not be located within escape routes, such items include; portable heaters, cooking appliances, upholstered furniture, coat racks, vending machines, gas pipes and meters, photocopiers and other electrical equipment, seasonal decorations and display or exhibition material.



Emergency exits shall be indicated on the external side with "Fire Exit Keep Clear" signs.

5.3 Fire Warning System

A fire warning system is a system designed to provide an audible alarm and may include activation by means of detecting the elements of combustion. In all cases the alarm can be activated by means of a manual alarm call point. Manual alarm call points are normally situated in exit routes and at

final exits. Where fire is known or suspected, the alarm should be raised immediately utilising a manual alarm call point (break glass point).



On hearing an alarm all occupants of a premise (employees, student's, contractors and the public) must evacuate the building by the nearest available exit and assemble at the prescribed assembly point, with the exception of authorised persons for specific tasks, such as alarm investigation or PEEPs implementation.

The Area Fire Officer will indicate, following consultation with the Fire & Rescue Service if in attendance, when a return to the building may be made.

5.4 Fire Fighting Equipment

Firefighting equipment is provided within fire exit routes and may be placed adjacent to some specific risks, such as computer servers, electrical transformers, etc. The extinguishers are provided for use by trained competent persons but should only be used when it is safe to do so and the escape route from the seat of fire is not compromised. Under no circumstances should a fire be confronted without first raising the alarm.



Fire extinguishers are supplied and maintained by RISKAS Ltd.

All employees are required to familiarise themselves with the extinguishers provided within the relevant premise and the fire classification that may influence their limitations of use. Where any fire-fighting equipment has been used or is deemed unsatisfactory, the Director of Marketing, MIS and Infrastructure / Fire Safety Manager should be advised to facilitate replacement or investigation as necessary.

5.5 Structural Alterations

Where any structural or material alterations are carried out within a relevant premise that are likely to impact on the fire safety provision it will be the duty of the Director of Marketing, MIS and Infrastructure appropriate, to ensure that a copy of the proposals is made available to the Fire Safety Manager for his/her attention. Thereafter, it will be incumbent on the Fire Safety Manager to

ensure that a

review, if deemed necessary, of the Fire Safety Risk Assessment is carried out. It is also prudent to ensure the Fire Safety Manager is included at an early stage of correspondence in regard to any proposed material changes/alterations to any of the College's relevant premises. The Director of Marketing, MIS and Infrastructure and Maintenance should note that no work may be carried out on the relevant premises fabric or structure without authorisation from the Director of Student Experience and Enhancements.

5.6 External Waste Containers & Refuse Bins

External waste containers, refuse bins and industrial skips are a potential fire hazard to all buildings. Fires often occur in such receptacles and where they are placed in close proximity to a building, the potential for fire spread through radiation and convection of heat currents is a realistic possibility. To ensure this risk is eliminated all such receptacles must be placed a minimum of 6m from any building. In all cases no receptacles should be placed directly adjacent to or below any window, door or other openings of a building.

6.0 Fire Safety Policy Review

OLC (Europe) Ltd has an ongoing review process which audits, monitors and reviews the company's policies including independent annual fire risk assessments. That system is supplemented by an annual business review that considers the relevance and effectiveness of the fire safety policy.

This version 1.0 of the Fire Safety Policy was approved on 16/05/2022

Last review: 22/02/2023. To be reviewed: 28/02/2024

-----end of policy document-----

OLC (Europe) Ltd Disability policy

Policy Contents

- 1. Introduction**
- 2. Responsibilities**
- 3. Appointments**
- 4. Policy Monitoring and Review**

1. Introduction

OLC (Europe) Ltd and OLC College Ltd operating divisions provides education, training, research and professional services in the fields of business excellence, engineering, sciences, technology and management of resources. We recognize that our operations have an effect on the local, regional and global communities. In recognition of our ability to influence those communities OLC are committed to adopting an effective Disability Strategy.

2. Responsibilities

In the context above, OLC (Europe) Ltd will:

- Provide widening participation in its products and services
- Ensure that equal opportunities are afforded to potential and actual employees
- Give all visitors to the learning centre the opportunity to express any special needs or requirements specific to their own personal circumstances.
- Provide a centre for learning where people of all abilities are highly valued and contribute to the learning community. No exceptions.

3. Appointments

In order to meet its responsibilities OLC (Europe) Ltd has made the following appointments:

- Julie Semmens as Director of Student Experience and Enhancements Student Experience and Enhancements and is responsible for social needs and wellbeing of students and staff
- Dr David Bamber, PhD, Med, PGCE of Liverpool Hope University, as learning disability and special needs advisor and as expert in dyslexia and equal opportunities
- Mr. Ciaron Hindle and Ms. Beverly Hindle of Scope UK Ltd, as advisor for disabilities access and mobility.

4. Policy Monitoring and Review

OLC (Europe) Ltd has an ongoing review process which audits, monitors and reviews the company's performance against a range of measures including disability concerns. That system is supplemented by an annual business review that considers the relevance and effectiveness of the policy.

This version of the Disability Strategy was approved on 15/01/2016.

Last review: 22/02/2023. To be reviewed: 28/02/2024 .

**OLC (Europe) Ltd
Environmental and Sustainability Policy**

Policy Contents

- 1. Introduction**
- 2. General Responsibilities**
- 3. Specific Responsibilities**
- 4. Policy Monitoring and Review**

1. Introduction

OLC (Europe) Ltd provides education, training, research and professional services in the fields of business excellence, engineering, sciences, technology and management of resources. We recognize that our operations have an effect on the local, regional and global environment. As a consequence we are committed to promoting greater environmental awareness and positive attitudes and behaviour towards the environment amongst our client groups, especially through our educational programmes.

OLC (Europe) Ltd recognises that it has a duty to lead by example in the way it manages its relationship with the environment.

2. General Responsibilities

In this context, OLC (Europe) Ltd will:

- ☐ Contribute to sustainable development by integrating environmental issues into our work and management practices;
- ☐ Contribute to the protection and enhancement of the environment; Seek to promote an awareness and appreciation of the environment through the design and delivery of our academic, research and professional services and through our interactions with our trading partners and the local community;
- ☐ Adopt a systematic approach to environmental management in order to achieve continual improvement.

3. Specific Responsibilities

More specifically, OLC (Europe) Ltd will:

- ☐ Ensure compliance with relevant environmental laws, academia initiatives and codes of practice;
- ☐ Reduce and commit to prevent pollution from our activities;
- ☐ Optimise efficiency in the use of energy, water and other natural resources;
- ☐ Where possible build environmental considerations into the design and management of our teaching, research and consultancy activities, the procurement of goods and services and the development, operation and maintenance of sites and facilities;
- ☐ Adopt a waste management strategy which seeks to minimise waste from all on-site sources, improves waste recovery and re-use, and ensures appropriate storage and disposal procedures;
- ☐ Promote positive environmental awareness, attitudes and behaviour amongst staff, students, trading partners, contractors and other relevant interest groups;
- ☐ Establish an Environmental Management System which enables us to assess our environmental performance and take actions to continually improve it by setting, in our strategic plan, environmental performance objectives and targets;

- ☐ Communicate the environmental performance of OLC (Europe) Ltd to interested parties.

4. Policy Monitoring and Review

OLC (Europe) Ltd has an ongoing review process which audits, monitors and reviews the company's performance against a range of measures including environmental concerns. This system is supplemented by an annual business review which will consider the relevance and effectiveness of this policy.

This version of the Environmental and Sustainability Policy was approved on 15/01/2016.

Last review: 22/02/2023. To be reviewed: 28/02/2024

OLC (Europe) Ltd Refund Policy

Policy Contents

1. Policy Statement
2. Cancellations
3. Refunds
4. Policy Monitoring and Review

1. Policy Statement

OLC (Europe) Ltd. is committed to providing a fair and transparent fee structure for all of its courses. This policy covers all Higher Education courses where the student is registered as an OLC (Europe) student. Where students are studying at OLC (Europe), but are registered as the student of a partner institution, the policies of that partner institutions apply. Where students are studying on a course sponsored by an external company and there exists a separate agreement, the terms of that agreement apply.

This policy aims to:

- Make clear the circumstances in which refunds can be awarded;
- Ensure that refunds are applied fairly and consistently.

2. Cancellations

Applicants have the right to cancel their application to study up until 14 days after they agree to study on the course.

3. Refunds

Fee refunds are only made in the following circumstances:

- Course cessation;
- Incorrect application of fees;
- Exceptional circumstances at the college's discretion.

Exceptional circumstances are judged solely by the discretion of the college; decisions in such cases will be made by OLC (Europe)'s Board of Directors, or a designated representative. The college is unable to provide refunds for withdrawals from the course due to absence, due to changes in work commitments, or due to changes in personal or financial circumstances. Where a student is withdrawn from the course due to failure to adhere to required College standards, e.g. attendance, behaviour, academic rigour, health and safety, etc., no refund will be given.

If a refund is requested due to a student's dissatisfaction with the course, or other quality reasons, then a refund will be at the discretion of OLC (Europe)'s Board of Directors, or representative thereof. Refunds for these reasons will only be considered where the College has been notified of the issue/s in good time and has had full opportunity to take corrective action.

4. Policy Monitoring and Review:

As part of the College's ongoing commitment to quality this policy will be reviewed annually.

This version of the Refund Policy was approved on: 20/03/2020.

Last review: 22/02/2023. To be reviewed: 28/02/2024

OLC (Europe) Ltd Humanitarian and Charitable Policy

OLC (Europe) Ltd provides education, training, research and professional services in the fields of business excellence, engineering, sciences, technology and management of resources. We recognise that our operations have an effect on the local, regional and global communities. In recognition of our ability to influence those communities OLC is committed to a certain amount of humanitarian and charitable contributions.

OLC (Europe) Ltd recognises that it has a duty to lead by example in the way that it manages its relationship with humanitarian and charitable organizations and worthy causes.

In this context, OLC (Europe) Ltd will:

- ☐ Contribute to local initiatives that aim to improve social behaviour and the wellbeing of the local community;
- ☐ Contribute to the wider community by offering advice and encouragement to young people that are striving to improve their future and better themselves and their families;
- ☐ Provide education, training, research and consulting support to the local education establishments;
- ☐ Arrange and participate in a number of fund raising events each year;
- ☐ Adopt a systematic approach to the support of local, national and international charities;

More specifically, OLC (Europe) Ltd will:

- ☐ Each year organize a number of charity fundraising events;
- ☐ Fund selected local charitable events and money raising activities;
- ☐ Support the development and learning of individual students through work placements with OLC (Europe) Ltd or associated companies;
- ☐ Promote positive humanitarian awareness, attitudes and behaviour amongst staff, students, trading partners, contractors and other relevant interest groups;
- ☐ Promote a culture that respects others and is tolerant of their differences;
- ☐ Annually, choose a single charity, notwithstanding that other charities will be supported too, that OLC (Europe) Ltd will specifically contribute time, money and resource to;
- ☐ Offer reduced rates to publicly funded bodies, the Third Sector and charities;

OLC (Europe) Ltd has an ongoing review process which audits, monitors and reviews the company's performance against a range of measures including humanitarian and charitable concerns.

Managing Director



Date Created: 1st March 2007

Reviewed date: 30th March 2021

Review date: February 2022

OLC (Europe) Ltd Email, Internet, IT, Social Media And IT Security Policy

The purpose of this policy is to ensure the proper use of OLC Europe Ltd.'s email system and make users aware of what OLC Europe Ltd deems as acceptable and unacceptable use of its email system, IT and internet. OLC Europe Ltd reserves the right to amend this policy at its discretion. In case of amendments, users will be informed appropriately

EMAIL POLICY

Use of email by employees of OLC (Europe) Ltd Ltd.'s is permitted and encouraged where such use supports the goals and objectives of the business.

BEST PRACTICES

However, OLC Europe Ltd has a policy for the use of email whereby the employee must ensure that they:

- ☐ comply with current legislation
- ☐ use email in an acceptable way
- ☐ Do not create unnecessary business risk to OLC (Europe) Ltd Ltd.'s by their misuse of the internet.

OLC Europe Ltd considers email as an important means of communication and recognises the importance of proper email content and speedy replies in conveying a professional image and delivering good customer service. Therefore OLC Europe Ltd wishes users to adhere to the following guidelines:

WRITING EMAILS:

- ☐ Write well-structured emails and use short, descriptive subjects.
- ☐ OLC (Europe) Ltd.'s email style is informal. This means that sentences can be short and to the point. You can start your e-mail with 'Hi', or 'Dear', and the name of the person. Messages can be ended with 'Best Regards'. The use of Internet abbreviations and characters such as smileys however, is not encouraged.
- ☐ Signatures (as below) must include your name, job title and OLC Europe Ltd.'s name. A disclaimer will be added underneath your signature (see Disclaimer).
- ☐ Use the spell checker before you send out an email.
- ☐ Do not send unnecessary attachments. Compress attachments larger than 200K before sending them.
- ☐ Do not write emails in capitals.
- ☐ Do not use cc: or bcc: fields unless the cc: or bcc: recipient is aware that you will be copying a mail to him/her and knows what action, if any, to take.
- ☐ If you forward emails, state clearly what action you expect the recipient to take.
- ☐ Only send emails of which the content could be displayed on a public notice board. If they cannot be displayed publicly in their current state, consider rephrasing the email, using other means of communication, or protecting information by using a password (see confidential information below).
- ☐ Only mark emails as important if they really are important.

SIGNATURE

The following signature will be added to each outgoing email:

XXXXXX (Name) XXXXXX (Job Title)	Tel: +44 (0) 1204 525511 Email: ynotara@olceurope.com Web: www.olceurope.com Ref A Friend
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REPLYING TO EMAILS:

Emails should be answered within at least 2 working hour, but users must endeavour to answer priority emails immediately.

Priority emails are emails from existing customers and business partners.

MAINTENANCE:

- ☐ Delete any email messages that you do not need to have a copy of.
- ☐ Set your email client to automatically empty your 'deleted items' on closing.
- ☐ In the case of absence you should set up an auto-responder if possible. This should provide an alternative contact and length of absence if known.(contact the IT Department)
- ☐ Important emails need to be saved securely using a hierarchical file structure.
- ☐ Staff must not leave their mailbox open and unattended.

CONFIDENTIAL INFORMATION

Avoid sending confidential information by e-mail. If you do, you must secure the information by including it in a Microsoft Word or Excel file and protecting it with a password. Then provide the recipient with the password by means of other communication, for instance by telephone.

NEWSGROUPS:

Users need to request permission from the IT Department before subscribing to a newsletter or news group.

PERSONAL USE

Although OLC (Europe) Ltd.'s email system is meant for business use, OLC Europe Ltd allows the reasonable use of email for personal use if certain guidelines are adhered to:

- ☐ Personal use of email should not interfere with work.
- ☐ Personal emails must also adhere to the guidelines in this policy.
- ☐ Personal emails are kept in a separate folder, named 'Private'. The emails in this folder must be deleted weekly so as not to clog up the system.
- ☐ The forwarding of chain letters, junk mail, jokes and executables is strictly forbidden.
- ☐ Do not send mass mailings.
- ☐ All messages distributed via the OLC Europe Ltd.'s email system, even personal emails, are OLC (Europe) Ltd.'s property.

SAFETY:

- ☐ Only register your email address with reputable organisations
- ☐ Never give personal details out over the internet unless you have initiated the transaction and you are confident of the identity of the receiving party.
- ☐ Never open, reply or forward spam [junk mail]
- ☐ Inform the College IT Administrator if you regularly receive junk mail into your account.
- ☐ Staff who receive inappropriate email need to inform the supervisor immediately;the email must not be replied to.
- ☐ Follow these guidelines and ensure that the anti-virus on your PC is kept up-to-date.
- ☐ Be cautious when opening attachments; save any attachments to the computer's hard drive to ensure they are scanned before opening.
- ☐ Report any problems with your email account to the Supervisor for resolution.

UNACCEPTABLE BEHAVIOUR

The following behaviour by an employee is considered unacceptable:

- ☒ use of OLC (Europe) Ltd.'s communications systems to set up personal businesses or send chain letters
- ☒ forwarding of OLC (Europe) Ltd.'s confidential messages to external locations
- ☒ distributing, disseminating or storing images, text or materials that might be considered indecent, pornographic, obscene or illegal
- ☒ distributing, disseminating or storing images, text or materials that might be considered discriminatory, offensive or abusive, in that the context is a personal attack, sexist or racist, or might be considered as harassment
- ☒ accessing copyrighted information in a way that violates the copyright
- ☒ breaking into the OLC (Europe) Ltd.'s or another organisation's system or unauthorised use of a password/mailbox
- ☒ broadcasting unsolicited personal views on social, political, religious or other non-business related matters
- ☒ transmitting unsolicited commercial or advertising material
- ☒ undertaking deliberate activities that waste staff effort or networked resources
- ☒ introducing any form of computer virus or malware into the corporate network

SYSTEM MONITORING

You must have no expectation of privacy in anything you create, store, send or receive on OLC (Europe) Ltd.'s computer system. Your emails can be monitored without prior notification if OLC Europe Ltd deems this necessary. If there is evidence that you are not adhering to the guidelines set out in this policy, then OLC Europe Ltd reserves the right to take disciplinary action, including termination and/or legal action.

- ☒ OLC Europe Ltd accepts that the use of email is a valuable business tool. However, misuse of this facility can have a negative impact upon employee productivity and the reputation of the business.
- ☒ In addition, all of the OLC (Europe) Ltd.'s email resources are provided for business purposes. Therefore, OLC Europe Ltd maintains the right to examine any systems and inspect any data recorded in those systems.
- ☒ In order to ensure compliance with this policy, OLC Europe Ltd also reserves the right to use monitoring software in order to check upon the use and content of emails. Such monitoring is for legitimate purposes only and will be undertaken in accordance with a procedure agreed with employees.

EMAIL ACCOUNTS

All email accounts maintained on our email systems are property of OLC Europe Ltd. Passwords should not be given to other people and should be changed when applicable. Email accounts not used for 60 days will be deactivated and possibly deleted.

LEGAL RISKS

Email is a business communication tool and users are obliged to use this tool in a responsible, effective and lawful manner. Although by its nature email seems to be less formal than other written communication, the same laws apply. Therefore, it is important that users are aware of the legal risks of e-mail:

- ☒ If you send emails with any libellous, defamatory, offensive, racist or obscene remarks, you and OLC Europe Ltd can be held liable.
- ☒ If you forward emails with any libellous, defamatory, offensive, racist or obscene remarks, you and OLC Europe Ltd can be held liable.
- ☒ If you unlawfully forward confidential information, you and OLC Europe Ltd can be held liable.
- ☒ If you unlawfully forward or copy messages without permission, you and OLC Europe Ltd can be held liable for copyright infringement.
- ☒ If you send an attachment that contains a virus, you and OLC Europe Ltd can be held liable.

By following the guidelines in this policy, the email user can minimise the legal risks involved in the use of e-mail. If any user disregards the rules set out in this Email Policy, the

user will be fully liable and OLC Europe Ltd will disassociate itself from the user as far aslegally possible.

LEGAL REQUIREMENTS

The following rules are required by law and are to be strictly adhered to:

- ❑ It is strictly prohibited to send or forward emails containing libellous, defamatory, offensive, racist or obscene remarks. If you receive an e-mail of this nature, you must promptly notify your supervisor.
- ❑ Do not forward a message without acquiring permission from the sender first.
- ❑ Do not send unsolicited email messages.
- ❑ Do not forge or attempt to forge email messages.
- ❑ Do not send email messages using another person's email account.
- ❑ Do not copy a message or attachment belonging to another user without permission of the originator.
- ❑ Do not disguise or attempt to disguise your identity when sending mail.

SANCTIONS

- ❑ Where it is believed that an employee has failed to comply with this policy, they willface OLC Europe Ltd.'s disciplinary procedure. If the employee is found to have breached the policy, they will face a disciplinary penalty ranging from a verbal warning to dismissal. The actual penalty applied will depend on factors such as the seriousness of the breach and the employee's disciplinary record.

2 INTERNET GENERAL USAGE POLICY

- Reasonable private use of the Internet is permitted but should be kept to a minimum and should not interfere with an employee's work. Excessive private access to the Internet during working hours may lead to disciplinary action.
- The sites accessed by employees must comply with the restrictions set out in these guidelines.
- Accessing inappropriate sites may lead to disciplinary action.

COPYRIGHT AND DOWNLOADING

- Copyright applies to all text, pictures, video and sound, including those sent by e-mail or on the Internet. Files containing such copyright protected material may be downloaded, but not forwarded or transmitted to third parties without the permission of the author of the material or an acknowledgement of the original source of the material, as appropriate.
- Copyrighted software must never be downloaded, installed or distributed.
- The downloading of bit-mapped images and multimedia files is limited to the disk space on your network drive.
- OLC Europe Ltd.'s employees must never use OLC Europe Ltd.'s 's computer systemsto engage in external news/discussion groups that are not directly related to OLC Europe Ltd.'s business.
- OLC Europe Ltd.'s employees must not reveal or publicize any confidential or proprietary information which includes, but is not limited to: financial information,business or marketing plans, databases and the information contained therein, student details, staff details, network access codes and business relationships.

GENERAL COMPUTER USAGE

- Employees are responsible for safeguarding their passwords for the system. For reasons of security, individual password should not be printed, stored on-line orgiven to others - if another member of staff needs access to another employee's

information they should ask IT Services how this can best be achieved. For detailed password guidance please refer to the OLC Europe Ltd.'s IT Security Policy.

- Employees may not eat or drink in information technology teaching areas.
- Staff should 'shut down' and switch off all computers at the end of the day.

USE OF THE NETWORK

- Students are not to be granted access to the OLC Europe Ltd.'s administrative network under any circumstances.
- The network may not be used to corrupt or destroy other users' data, violate the privacy of other users or disrupt the work of other users.
- The network may not be used for unauthorised access, or attempted unauthorised access to facilities or services accessible via any network.
- Staff should report breaches or suspected breaches of OLC Europe Ltd.'s IT security to the Director of IT.
- The use of personally owned ICT equipment, e.g. laptops, mobile phones, PDA's, MP3 players, wireless capable devices, USB memory sticks etc., to connect, upload or download data on OLC Europe Ltd.'s network is not permitted.

NETWORK AND LOCAL DRIVES

- Network drives, including personal drives (usually the Z drive) are part of OLC Europe Ltd.'s resources provided for official business use.
- Staff must not save software and/or large personal files to any network drive. These drives are regularly monitored, particularly when disk space is at a premium. In particular, graphics, music, video files and '.exe' files will be targeted.
- Personal use of OLC Europe Ltd.'s ICT resources is not considered private. Staff do not have the same personal privacy rights when using these devices as they would if they were using private communication devices. This means that employees reasonably suspected of abusing personal use of employer-supplied communication devices may be asked to explain their actions.
- Staff should be aware that the same general restrictions apply to storing data on their personal one drive, Teams and Core platforms (In particular, they must not store prohibited or inappropriate material, software or material that is subject to copyright.

COPYING OR INSTALLING SOFTWARE ON OLC EUROPE LTD'S COMPUTERS

- Software of any description may not be copied or installed on OLC Europe Ltd.'s computers unless staff have been given specific approval to do so. This applies to all software, including software that is privately owned or obtained from the Internet and on-line services. If a staff member has a need to install any software, they should follow the appropriate process within their Directorate. For information on this, they should contact their Supervisor in the first instance and then the relevant ICT Manager.
- All staff are responsible for ensuring that they act with due care and vigilance in respect of protecting OLC Europe Ltd.'s ICT assets from malicious software, such as viruses.

SOFTWARE MANAGEMENT

- Employees will use software only in accordance with its license agreement and the OLC Europe Ltd.'s Computer Software Policies & Procedures. Unless otherwise provided in the license, any duplication of copyrighted software, except for backup and archival purposes, is a violation of copyright law. In addition to violating copyright law, unauthorised duplication of software is contrary to the OLC Europe

Ltd.'s software standards policy. The following points are to be followed in order to comply with software license agreements.

- Employees will use all software in accordance with its license agreements.
- Employees will not make any unauthorised copies of any software under any circumstances. Anyone found copying software other than for back up purposes will be subject to disciplinary action.
- OLC Europe Ltd will not tolerate the use of any unauthorised copies of software owned or licensed by OLC Europe Ltd. Any person illegally reproducing software can be subject to civil and criminal penalties, including fines and imprisonment.
- OLC Europe Ltd.'s does not condone illegal copying of software under any circumstances and anyone who makes, uses, or otherwise acquires unauthorised software within OLC Europe Ltd.'s premises will be appropriately disciplined.
- No user will give software to any outsiders, including learners, contacts and others.
- Any user who determines that there may be a misuse of software within the OLC Europe Ltd.'s will notify the IT Director.
- All software used by OLC Europe Ltd on OLC Europe Ltd.'s -owned computers will be purchased through appropriate procedures. In addition, only software that fulfils a required business need will be purchased.
- As a minimum, when staff are away from their desks for extended periods of time they should ensure that access to their computer / data is prevented by using the Windows Key + L command to lock their PC.

CURRENTLY PROHIBITED SOFTWARE

Users are currently not permitted to use the following software:

- Download managers, such as GetRight
- Filesharing software, such as Kazaa, BitTorrent and DirectConnect
- HTTP tunnelling software
- Share scanning software, such as Sharescan, LANster
- Users are discouraged from leaving the following software running when not at their computers:
 - Instant messaging clients

REPORT TO THE BOARD

The IT Manager will prepare a monthly report to the Board of Directors summarising any changes to IT infrastructure, maintenance required and web usage statistics.

3 LEGAL ISSUES IT POLICY

Data Protection

OLC Europe Ltd holds a wealth of confidential information relating to its staff, customers, clients and suppliers, much of which is in electronic format. The unauthorised release of such information, for example via e-mail, would be in breach of the Data Protection Act 1998 and could make individual employees and OLC Europe Ltd liable to substantial fines.

Human Rights

The Human Rights Act 1998 gives individuals the right to respect for private and family life, home and correspondence. By encouraging users to identify e-mails as "personal" in the subject heading, OLC Europe Ltd is looking to safeguard the privacy of employees' correspondence. E-mails marked "Personal" will be opened for monitoring purposes only in exceptional circumstances, for example, where serious crime is suspected. They will however, still be subject to the normal monitoring.

Harassment, Discrimination and Defamation

If employees transmit obscene or discriminatory materials or harass other individuals by e-mail, this may cause offence and incur liability for the individuals concerned, as well as for the Authority. Similarly, if employees use the ICT facilities to make defamatory or

discriminatory statements they (and OLC Europe Ltd) could face legal action. Users should make themselves aware of the contents of the Sex Discrimination Acts 1975 and 1986, Race Relations Act 1976 (amended 2000) the Disability Discrimination Act 1995 and 2005 and other UK legislation and regulations covering issues of race, sex, age, disability, sexual orientation, religion or belief. The HMSO website contains full details of this legislation.

Equality Legislation

OLC Europe Ltd is committed to preventing the use of its computer systems and networks for the distribution, publication or viewing of material which would be considered discriminatory. This would include discrimination on the basis of race, gender, age, disability, sexual orientation, religion or belief, in line with the requirements of UK equality legislation. This legislation includes The Sex Discrimination Act (1975 & 1986), The Race Relations Act, 1976 (amended 2000), The Disability Discrimination Act (1995 & 2005) and any other UK equality legislation and employment regulations.

Software Licensing and Copyright

Only software that is developed by OLC Europe Ltd or licensed or provided by the developer to OLC Europe Ltd should be used on OLC Europe Ltd.'s ICT facilities. Under no circumstances should users copy software from one PC to another without the appropriate license agreement. OLC Europe Ltd could be liable to substantial fines if it was discovered using software without the appropriate license.

Users should take care in copying material obtained through attachments to e-mails or, from information sources via the Internet. There may be copyright or other restrictions on such material and unauthorised use including copying or onward transmission may be an infringement of copyright (section 17, Copyright, Designs and Patents Act 1988).

COMPUTER MISUSE ACT 1990

Under the provisions of this Act, it is likely that the following types of information would be illegal:

- material that enables others to gain unauthorised access to a computer system
- material that permits an unauthorised user, who has gained access to a system, to carry out any modification of the computer programs or data stored in the system
- Material which incites or encourages others to carry out unauthorised access to or modification of a computer system.

RIPA, the Lawful Business Practices Regulations and Employment Practices Data Protection Code: Monitoring at Work

The Regulation of Investigatory Powers Act 2000 (RIPA) states that the interception of communications in the course of transmission without consent is prohibited except in specific limited circumstances such as covert surveillance operations and for reasons of national security. The Lawful Business Practices Regulations 2000 set out the exceptions to RIPA and provide the basis under which OLC Europe Ltd.'s monitoring activity can take place. The Employment Practices, Data Protection Code gives further guidance on how monitoring should be carried out. It aims to strike a balance between the rights of individuals (their privacy) and those of the employers (their ability to monitor activities to ensure their business is operating effectively). OLC Europe Ltd has used the benchmarks and practical guidance in the Code to help develop the policy for the Acceptable Use of ICT Facilities, particularly in relation to the monitoring of e-mail.

Obscene Publications, Pornography etc

OLC Europe Ltd is committed to the prevention of publication on its networks of any material which it may consider pornographic, excessively violent or which comes within the provisions of the Obscene Publications Act or the Protection of Children's Act. In no circumstances should users send e-mails containing pornography or other objectionable or potentially criminal material. If users receive an e-mail that they believe may contain pornography or, on opening an e-mail find such material, for example in an attachment, they should immediately close it and report the incident to OLC Europe Ltd.'s IT Manager.

Any use of OLC Europe Ltd.'s ICT systems to publish, distribute, or gain access to obscene, discriminatory, pornographic or excessively violent material will lead to disciplinary action being taken.

4 SOCIAL MEDIA POLICY

OLC Europe Ltd recognises the importance of the Internet in shaping public thinking about OLC Europe Ltd, our current and prospective students, staff and partners.

As a result OLC Europe Ltd has set up the Official Facebook Fan Pages, Twitter, Instagram, Linked In and YouTube accounts with the aim of informing stakeholders about OLC Europe Ltd activities and developments, building online communities and allowing stakeholders to share ideas and experiences through discussions, postings, photos and videos.

Stakeholders include but are not limited to current and prospective students, alumni, OLC Europe Ltd staff, employees, partner institutions and members of the community.

To ensure a positive online environment for students and staff, the following code of conduct has been produced to which all OLC Europe Ltd social media participants should adhere to.

Guidelines for Social Networking

Online communities can help OLC Europe Ltd connect with its stakeholders in many ways. At the same time, there are some cautionary lessons that have emerged from participating in online communities. Participants should take note of the following:

- You are legally liable for anything you write or present online. Employees and students can be disciplined by the OLC Europe Ltd for commentary, content, or images that are defamatory, pornographic, proprietary, harassing or that can create a hostile work environment. You can also be sued by OLC Europe Ltd employees, competitors, and any individual or company that views your commentary, content or images as defamatory, pornographic, proprietary, harassing or creating a hostile work environment. No written comment should be made that could be offensive to anyone in any of the Equality and Diversity strands: age, disability, gender/transgender, religion or belief, sexual orientation, socio-economic group.
- You are posting content onto the World Wide Web and cannot ensure who does and does not have access to your information.
- Information you post online may continue to stay on the World Wide Web even after you erase or delete that information from pages.
- Before participating in any online community understand that anything posted online is available to anyone in the world.
- Do not post information, photos or other items online that could reflect negatively on you, your family or OLC Europe Ltd community.
- Be discreet, respectful, gracious and as accurate as you can be in any comments or content you post online.

All staff are reminded that any form of personal relationship between staff and students who are under 18 years of age or are vulnerable adults, is expressly forbidden. This would include any form of personal conversation or comment through the medium of the Internet. Therefore, Staff should not be 'Facebook friends' with such students, but rather belong to the same Fan Page where information can be exchanged. This excludes staff blogging and micro-blogging (see Blogging Code below).

Guidelines for Blogging

- If teaching staff and/or a student own a blogging site the following guidelines should apply.

- Personal blogs should have clear disclaimers that the views expressed by the author in the blog is the author's alone and do not represent the views of the OLC Europe Ltd. Be clear and write in first person. Make your writing clear that you are speaking for yourself and not on behalf of the OLC Europe Ltd.
- Information published on your blog should comply with the OLC Europe Ltd policies. This also applies to comments posted on other blogs, forums and social networking sites.
- Be respectful to the OLC Europe Ltd's other employees, students and competitors.
- Social media activities should not interfere with work commitments.
- Your online presence reflects the OLC Europe Ltd. Be aware that your actions captured via images, posts, or comments can reflect that of the OLC Europe Ltd.
- Do not reference OLC Europe Ltd employees or partners without their express consent.
- Respect copyright laws, and reference or cite sources appropriately. Plagiarism applies online as well.
- Company logos and trademarks may not be used without the written consent of the Marketing Division as set out below.

Social Networking and Blogging

- Where no guidelines exist, staff should use their professional judgement and take the most prudent action possible. Consult with the OLC Europe Ltd.'s IT Manager if you are uncertain.
- Media contacts about the OLC Europe Ltd, our students, employees, partners, customers and competitors must be referred for co-ordination and guidance to the Manager.
- The breach of the Social Media Policy and any content that would adversely affect the OLC Europe Ltd could result in a disciplinary action.

Disclaimers

OLC Europe Ltd social networking pages will include the following disclaimers:

Terms of Use

"By posting content on this page, you represent, warrant and agree that no content submitted, posted, transmitted or shared by you will infringe upon the rights of any third party, including copyright, trademark, privacy or contain defamatory, discriminatory or otherwise unlawful material."

User Generated Content Disclaimer

"OLC Europe Ltd accepts no responsibility or liability for any data, text, software, music, sound, photographs, images, video, messages or any other materials or content generated by users and publicity posted on this page."

OLC Europe Ltd Logos

"OLC Europe Ltd logos are registered trademarks and the use of any OLC Europe Ltd logo is not permitted on any content generated by a user. Permission to use the OLC Europe Ltd logo is only granted by a formal letter from the Marketing Division of the OLC Europe Ltd accompanied by a trademark statement and Style Guidelines."

Inappropriate Content

"Anyone who believes that any social media site covered by these guidelines includes inappropriate content should report it to the IT Manager in OLC Europe Ltd."

Permission for Postings

"Photos should not be posted without written consent from the person photographed or the copyright holder. e.g. student photos and photographs that have been published in any media."

Disclaimer for Content on Linked Sites

“OLC Europe Ltd accepts no liability or responsibility whatsoever for the contents of any site linked from this page.”

Site Administrator Content

“The comments and postings on this site are those of the site administrators and do not necessarily reflect OLC Europe Ltd opinions, strategies or policies.”

5 IT SECURITY POLICY

- OLC Europe Ltd acknowledge their responsibilities to pursue a policy that will ensure, so far as is reasonable and practicable, the security of all enrolled students, staff employed, members of the general public who have reason to be on the premises, the buildings and the contents therein.
- It is the intention of OLC Europe Ltd to ensure, as far as is practicable, the security and safety of staff employed to work in OLC Europe Ltd, all enrolled students and others who have reason to be on the premises, and the security of the contents.
- Effective and efficient systems and procedures have been developed to maintain this objective, which are contained in documented procedures formulated by OLC Europe Ltd and will be reviewed on a regular basis.
- Whilst maintaining control of access to and egress from the premises, due account will be taken of the need to comply with the requirements of the Disability Discrimination Act 1995 in providing adequate facilities for people with disabilities.
- No responsibility will be taken for the loss or damage to personal belongings of staff, students or visitors.

USB Memory Sticks (Also known as Flash Drives or Pen Drives)

- Wherever possible the use of removable media should be avoided, and on no account should employees use any personally owned removable media or computer device to download OLC Europe Ltd.'s data, connect to the network or to OLC Europe Ltd.'s owned computer equipment.
- In instances where the use of USB memory sticks cannot be avoided, only those supplied by the OLC Europe Ltd.'s IT department are permitted to be used within OLC Europe Ltd for the storage of OLC Europe Ltd.'s data. The IT department issues USB sticks.

Other Removable Media

Wherever possible the use of other removable media should be avoided, this would include the use of removable CDs/DVDs, external hard drives, media cards as used in phones, digital cameras, PDA's etc. and in some circumstances laptops.

DVD's, CD's & Floppy Disks

As encryption software cannot be easily applied to DVD's and CD's they should never be used to store OLC Europe Ltd.'s personal or sensitive information/data. Similarly floppy disks, although an older technology, must never be used to store personal or sensitive information.

External Hard Drives

External hard drives will not be purchased for use within departments unless there is a specific business case for doing so and this has been approved by the IT department. Where they are required for business use to store OLC Europe Ltd.'s information/data, encryption software will also be installed to ensure data security.

Media Cards

Media cards, such as those used in digital cameras and mobile phones, are only permitted to be used for defined business reasons where this has been approved by IT department. Such devices must not be connected to any OLC Europe Ltd.'s ICT equipment unless

otherwise agreed by the IT department. They must not be used to store any personal or sensitive data.

Use of USB ports in student computer centres

In the past, it was difficult to transfer large files between a student access computer and a computer at home. Floppy disks are small in capacity, slow in operation and fairly unreliable. CD-writers have not been provided for a variety of reasons.

Now a number of device types which connect through a USB port have become available. In particular, 'pens' containing flash memory of varying sizes have appeared, are relatively cheap and are very portable. OLC Europe Ltd recognises the benefits of these technologies to staff and students and wishes to encourage their usage. However, as with many things, these technologies can easily be put to use in activities which are not related to staff/students' study and which may even be in contravention of enacted legislation, especially where copyright is concerned. To help staff/students use these technologies in a fitting manner, a set of guidelines has been drawn up in this policy document. Practical advice is offered wherever possible, although it should be borne in mind that advice on technical issues and prices can quickly become obsolete.

Copyright

Staff/Students must comply with the provisions of the Copyright, Designs and Patents Act 1988.

Copying Files to USB-Attached Storage Devices (students)

Only files relating to the relevant course work of students can be copied, subject to copyright. Relevant files would include files in their own file space which they have produced and files in others' file space to which they have been granted permission to copy. Files belonging to a computer's operating system and its installed applications must not be copied. Music and video files must not be downloaded from the internet. Normally this activity will be in breach of copyright, but may also adversely impact on network performance.

Copying Files from USB-Attached Storage Devices (students)

Only files relating to the relevant course work of students can be copied, subject to copyright. Files which can be executed should not be copied to the hard disk of the computer being used.

Files which may be detrimental to the performance and/or stability of either the computer being used or another network-attached computer must not be copied to the computer being used.

Execution of Files Stored on USB-Attached Storage Devices (staff/students)

It is not permitted to execute program files or script files that are stored on the storage device, except where the staff/student has developed the program file or script file as a legitimate part of their course/work and the file will have no adverse effect on the performance or stability of the computer on which it is executed.

Playback of Video Files Stored on USB-Attached Storage Devices (students)

It is not permitted to playback video files stored on the storage device.

Suitable Devices

Devices deemed as suitable for attachment to the USB ports of computers in OLC Europe Ltd have one thing in common: they must not require device driver software to be installed on the OLC Europe Ltd computers. They must be capable of operating under the built in drivers of the computers operating system. The USB devices most suitable for use in OLC Europe Ltd would be memory pens. These are small and robust, come with different memory sizes and are relatively cheap. If a staff member or student wishes to attach another type of USB device they should contact the Computer Assistant in the first instance.

Sanctions

Those who do not observe the conditions of use for USB-attached devices in OLC Europe Ltd, as set out in this policy and our security policies generally, may become subject to OLC Europe Ltd.'s disciplinary procedures.

Data Back-up Policy

The company document and data control methods can be viewed, as a supporting procedure, in the Business System Model. The procedure states that company data is backed-up twice monthly. Company data is defined within the Business System Model in the 'List of Documents and Associated Records'.

6 ACCESS TO THE POLICY

- All staff must be familiar with all policies and procedures, detailed criteria can be found at OLC Europe Ltd in policy files.

QUESTIONS

If you have any questions or comments about this Email Policy, please contact your supervisor. If you do not have any questions OLC Europe Ltd presumes that you understand and are aware of the rules and guidelines in this Email Policy and will adhere to them.

AGREEMENT

All OLC Europe Ltd.'s employees, contractors or temporary staff who have been granted the right to use the OLC Europe Ltd.'s email, internet and IT services are required to sign this agreement confirming their understanding and acceptance of this policy.

DECLARATION

I have read, understand and acknowledge receipt of the **EMAIL, INTERNET, IT, SOCIAL MEDIA AND IT SECURITY POLICY**. I will comply with the guidelines set out in this policy and understand that failure to do so might result in disciplinary or legal action.

Signature: _____

Date: _____

Printed Name: _____

7 REFERENCES

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OLC (Europe) Ltd Quality Policy

OLC (Europe) Ltd including OLC College Ltd operating divisions provides education, training, research and professional services OLC (Europe) Limited are committed to continual improvement of their quality management system. This shall be achieved by:

- Developing and communicating quality objectives for the organisation that aim to improve the business through the attainment of enjoyment in work; growth in knowledge; building partnerships; growth in capital and stakeholder satisfaction
- Satisfying customers and students training, consultancy, projects and research needs profitably, through effective business process management
- Maintaining a quality management system that complies to the requirements of ISO 9001: 2015 and using the QAA UK Quality Code for Higher Education for leading organizational excellence

OLC (Europe) Ltd has an ongoing review process which audits, monitors and reviews the company's performance against a range of measures including quality management systems concerns. That system is supplemented by an annual business review that considers the relevance and effectiveness of the policy.

This version of the Quality Policy was approved on 15/01/2016.
Last review: 22/02/2023. To be reviewed: 28/02/2024

**OLC (Europe) Ltd.
Handling of DBS Certificate Information Policy**

Policy Contents

- 1.1 General principles
- 1.2 Storage and access
- 1.3 Handling
- 1.4 Usage
- 1.5 Retention
- 1.6 Disposal

1.7 Acting as an umbrella body.

1.1 General principles

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, [Organisation Name] complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.

It also complies fully with its obligations under the General Data Protection Regulation (GDPR), Data Protection Act 2018 and other relevant legislation pertaining to the safe handling, use, storage, retention, and disposal of certificate information and has a written policy on these matters, which is available to those who wish to see it on request.

1.2 Storage and access

Certificate information should be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

1.3 Handling

In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom certificates, or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

To note: organisations which are inspected by the Care Quality Commission (CQC) or Ofsted, and those establishments which are inspected by the Care and Social Services Inspectorate for Wales (CSSIW) may be legally entitled to retain the certificate for the purposes of inspection.

In addition, organisations that require retention of certificates to demonstrate 'safer recruitment' practice for the purpose of safeguarding audits may be legally entitled to retain the certificate. This practice will need to be compliant with the Data Protection Act, Human Rights Act, General Data Protection Regulation (GDPR), and incorporated within the individual organisation's policy on the correct handling and safekeeping of DBS certificate information.

1.4 Usage

Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

1.5 Retention

Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This retention will allow for the consideration and resolution of any disputes or complaints or be for the purpose of completing safeguarding audits.

Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

1.6 Disposal

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, for example by shredding, pulping, or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g., waste bin or confidential waste sack).

We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.

1.7 Acting as an umbrella body.

Before acting as an umbrella body (an umbrella body being a registered body which countersigns applications and receives certificate information on behalf of other employers or recruiting organisations), we will take all reasonable steps to satisfy ourselves that they will handle, use, store, retain and dispose of certificate information in full compliance with the [code of practice](#) and in full accordance with this policy.

We will also ensure that any body or individual, at whose request applications for DBS certificates are countersigned, has such a written policy and, if necessary, will provide a model policy for that body or individual to use or adapt for this purpose.

OLC (Europe) Ltd. Recruitment of Ex-Offenders Policy

- as an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), [Organisation Name] complies fully with the [code of practice](#) and undertakes to treat all applicants for positions fairly
- OLC (Europe) Ltd undertakes not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed
- OLC (Europe) Ltd can only ask an individual to provide details of convictions and cautions that OLC (Europe) Ltd are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations as amended)
- OLC (Europe) Ltd can only ask an individual about convictions and cautions that are not protected
- OLC (Europe) Ltd is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background
- OLC (Europe) Ltd has a written policy on the recruitment of ex-offenders, which is made available to all DBS applicants at the start of the recruitment process
- OLC (Europe) Ltd actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records
- OLC (Europe) Ltd select all candidates for interview based on their skills, qualifications and experience
- an application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position
- OLC (Europe) Ltd ensures that all those in [Organisation Name] who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences
- OLC (Europe) Ltd also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g. the Rehabilitation of Offenders Act 1974
- at interview, or in a separate discussion, [Organisation Name] ensures that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment
- OLC (Europe) Ltd makes every subject of a criminal record check submitted to DBS aware of the existence of the [code of practice](#) and makes a copy available on request
- OLC (Europe) Ltd undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment.

**OLC (Europe)Ltd
Staff Handbook**

Induction Procedure

Welcome to OLC (Europe) Ltd and thank you for joining our team. We wish you good luck with your career with us and would like to say that we are committed to helping you develop and grow in order to benefit yourself and our business. To make your introduction to the company as useful and rewarding as possible you have been assigned a mentor who will guide you through the induction process. All employees are expected to complete this form during their first four weeks at OLC (Europe) Ltd. Remember your mentor is here to help you during this period and should be your first port of call if you require any help or guidance.

New employee to fill the form in/Mentor to sign the form each week

Your name:	Your mentor:	Your start date:

Week 1: Have you received the following?

Induction requirement	YES	NO	Action required by who/ when by
The OLC (Europe) Vision/Mission/Goals			
The OLC Business System			
(45) Staff Handbook			
(26) Skills Matrix			
Contract of Employment, (37) Student Placement Agreement, (20) Terms and Conditions for People & Partners (as appropriate)			
Notification of how to obtain and create operating procedures			
Job offer/description			
Tour of sites: Bolton, Manchester and Oldham			
Introduction to ALL OLC Directors and staff			
OLC internal telephone lists and contact details			

Mentor signature and date form reviewed for week 1:

Weeks 2 and 3: Has OLC (Europe) Ltd received the following?

Induction requirement	YES	NO	Action required by who/ when by
An up to date copy of your curriculum vitae/qualification certificates			Electronic required
Details for your business cards and contact details			
A written report from you on your first two weeks			

Written confirmation that you received the staffhandbook			
The completed (26) Skills Matrix			Against process tasks
A signed copy of your Contract of Employment, (37) Student Placement Agreement, (20) Terms			

and Conditions for People & Partners (as appropriate)			
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Are you clear about the following?

Induction requirement	YES	NO	Action required by who/ when by
Your current role and associated systems e.g. the Business System and associated documents			
Who the key members of OLC are and their responsibilities			
What the OLC (Europe) key product streams are			
Internal communication channels (procedures//emails/telephones/noticeboards/meetings)			
The company philosophy and what this requires of employees			

Mentor signature and date form reviewed for week 2:

Mentor signature and date form reviewed for week 3:

Week 4: Have you received the following?

Induction requirement	YES	NO	Action required by who/ when by
Your business cards (applicable to SMT, SLT)			
Feedback from your mentor on the first threeweeks			
A date for your appraisal and learning needs analysis			

Mentor signature and date form reviewed for week 4:

OLC (Europe) Ltd. Equal Opportunities Policy

This policy seeks to ensure that the talents and resources of employees and OLC students working on placement are utilised to the full and that no applicant, employee or OLC student working on placement receives less favourable treatment on the grounds of gender, marital status, sexual orientation, social class, race, ethnic origin, colour, nationality, national origin, religion, disability, age, or gender re-assignment or is disadvantaged by working conditions or requirements which are not relevant to job performance. Therefore, as a responsible employer OLC (Europe) Ltd will;

- Recognise its legal obligations under the Race Relations Act, the Race Relations Amendments Act, the Sex Discrimination Acts, the Equal Pay Act, the Disability Discrimination Act, the Employment Rights Act, the Employment Relations Act, and the Maternity and Parental Leave Regulations and the Equality Act 2010.
- Review periodically its recruitment criteria and policies.
- Ensure all employees are given equal opportunity in training and development to enable progression within the organisation.
- Distribute and publicise this policy throughout the organisation and elsewhere as appropriate.
- Enable employees and OLC students working on placement who believe that they have been unfairly treated to pursue the matter through the OLC (Europe) Ltd Grievance Policy.
- Investigate any complaint of discrimination from members of the public seeking employment with OLC (Europe) Ltd.

Managers will be responsible for the practical application of the Equal Opportunities Policy and in particular should ensure that;

- All employees and OLC students working on placement are aware of their responsibilities according to legislation, relevant codes of practice and this Equal Opportunities policy.
- Employment decisions are not discriminatory.
- Proper records of employment decisions are maintained.
- Fair standards of employment practice are maintained.

All employees and OLC students working on placement have a responsibility for ensuring that they do not unlawfully discriminate during the course of their employment/ placement. They must;

- Comply with this Policy and their responsibilities in relation to OLC (Europe) Ltd colleagues and customers.
- Adhere to and give support to any measures introduced to ensure equal opportunity.
- Not themselves discriminate, e.g. as supervisors or managers responsible for selection decisions in recruitment, promotion, transfer, training etc.
- Not themselves discriminate in applying conditions of employment.
- Not induce, or attempt to induce, other employees or unions or management to practice discrimination.
- Not victimise or attempt to victimise individuals on the grounds that they have made complaints or provided information on discrimination.
- Not harass, abuse or intimidate other employees, e.g. in attempts to discourage them from continuing their employment.

**OLC (Europe) Ltd.
Health & Safety at Work Policy**

Health, safety and the environment are everyone's responsibility

WORK SAFE - STAY SAFE

Welcome

Safety and the environment are vitally important to OLC (Europe) Ltd. It is essential that all work is carried out in a way that provides safe and healthy working conditions and avoids risk of injury or harm to everyone and our environment. Make sure you have identified the manager responsible for the work area you are in and also the OLC (Europe) Ltd mentor appointed to you at the start of your employment or contract. These people can point out to you the first-aiders, fire exits, main hazards and safe working methods. Their instructions must be followed. It is vitally important that you inform these people of any health problems that may affect your safety or the safety of others.

Housekeeping

Housekeeping is essential to good environmental, health and safety practice. Keep your work area tidy. Remember even if someone else created the mess, you may be at risk, TIDY IT UP. When you are setting up your area to start work consider how you position all the things you need and what you do with all the things around you that you do not need – make your area safe and your work effective.

Working in the office

Remember OLC (Europe) Ltd operate an integrated management system incorporating health, safety and environmental issues. A copy of the OLC (Europe) Ltd quality policy is displayed on the notice board and available from your manager if required, similarly operational process maps and procedures are also available-use them. The main areas for concern in the office environment are:

- Energy usage – When equipment is not in use switch it off.
- Housekeeping – A clean and tidy work place is safe for our employees and visitors and the environment.
- Recycling – Wherever possible use and re-use recycled paper and other products.
- Reduce – Always strive to reduce the generation of paper records and keep computer copies if possible.
- Packaging waste – Try to dispose of packaging in manner suitable for recycling (e.g. at bottle banks, ink cartridges back to suppliers, card and paper to recyclers).
- Computer usage – Keep your work on computers to 45 minute intervals only and take regular rests. Reduce screen glare with proper equipment.
- Stress – If you feel you or someone else at work is suffering from the symptoms of stress talk to your manager or mentor about it.
- Manual handling – Always handle objects correctly and do not attempt to lift any load too heavy for you. Remember lift with your leg muscles-not with your back. Ask for help if you need it.

Working away from the office

OLC (Europe) Ltd.
Operational Policies Document

From time to time you may be working away from the office, in this instance it is important that you abide by the health and safety requirements of the place of work. This may include, but may not be restricted to: following a safety induction programme, signing the visitors book,

wearing of PPE or working with a permit to work. You must follow the guidelines and instructions of your host organisation. If in doubt ask your host or a manager on site.

Additionally, if you have any concerns about a health, safety or environmental issue regarding a site or operation you are visiting then bring it to the attention of your host. If you want you can discuss this first with an OLC (Europe) Ltd Director before approaching the organisation in question.

Accidents and incidents

All injuries, however trivial, must be reported to your manager and recorded in the accident book (the corrective and preventive action procedure can be used). The accident will be investigated by a Director of OLC (Europe) Ltd to prevent repetition.

Any incident that is considered to be detrimental to the environment, whether in terms of health, safety or impact on the environment, must also be reported to your manager and this should be recorded on an internal memo form (the corrective and preventive action procedure can be used) addressed to all Directors. The incident will be investigated to prevent repetition.

Support for Staff

Staff are able to access support through the College's assistance programme by calling 0800 028 0199. This includes counselling, financial and legal advice as well as wellbeing resources.

Problems, concerns or doubts

If you have any problems, concerns or doubts with performing your tasks, please do not hesitate in bringing to the attention of your manager so they can be rectified.

Or alternatively, in case of concern, your OLC (Europe) Ltd health, safety and environmental contacts are:

Dr. Chris Bamber
(Managing Director,

Q,H,S and E management representative)

OLC (Europe) Ltd. Annual Leave Policy

Your Leave Entitlement

Your annual holiday entitlement is detailed within your employment contract. The leave year runs from the 1st January to the 31st December. If you start your employment part way through a leave-year, your holiday entitlement will be accrued on a pro-rata basis up to the start of the next leave-year. Un-used holidays are not automatically carried forward into the next leave year. In exceptional circumstances you may be allowed to carry some (or all) of your unused holiday forward to the next leave-year but this must be agreed by your line- manager before the end of the leave-year from which holiday is to be carried forward. The decision to allow unused holiday to be carried forward will be made at the discretion of your line-manager. You will not be financially compensated for any unused holidays that cannot be carried forward to the next leave-year.

Booking Annual Leave

Your holiday entitlement can be taken at any time during the leave-year. However, holidays must be authorised in advance by your line-manager. Leave requested and taken should be recorded within your annual holiday entitlement record. While your line-manager will always attempt to authorise the leave that you have requested, leave can only be taken when your absence will not have a detrimental impact upon OLC. Ultimately, your line-manager can refuse to authorise your proposed leave. In this situation your line-manager will offer you alternative dates during which your leave can be taken. You must give your line-manager notice of your intention to take annual leave as follows;

- For leave periods of less than 5 consecutive working days, at least 10 working-days' notice must be given to your line-manager.
- For leave periods of between 5 and 10 consecutive working days, at least 15 working-days' notice must be given to your line-manager.
- For leave periods in excess of 10 consecutive working days, at least 20 working-days' notice must be given to your line-manager.

Calculating Your Holiday Entitlement if you Leave OLC

If you have completed less than one year's service and you end your employment, your holiday entitlement will be calculated based upon the number of completed day's service as at your leaving date. If you have not taken your full entitlement your final pay cheque will include holiday pay. If you have taken more than your entitlement your final pay cheque will be reduced by an amount equal to the excess paid leave that you have taken.

If you have completed more than one year's service and you end your employment part way through a leave year, your holiday entitlement will be calculated based upon the number of fully completed month's service accrued during that leave year as at your leaving date (rounded up or down to the nearest half day). For example, if you finish your employment on the 21st October and you have an annual leave entitlement of 28 days your holiday entitlement would be;

$$28 \times \frac{9}{12} = 21 \text{ days}$$

If you have not taken your full entitlement your final pay cheque will include holiday pay. If you have taken more than your entitlement your final pay cheque will be reduced by an amount equal to the excess paid leave that you have taken.

**OLC (Europe) Ltd.
Sick Pay Policy**

OLC operates a policy whereby full, contracted pay rates, will be paid for the first 10 working days of any reported sickness absence during a rolling 12 month period. Thereafter employees will be paid at the contact statutory sick pay rate.

OLC (Europe) Ltd. Grievance Policy

1. Introduction

OLC (Europe) Ltd will ensure that employees and/or OLC students on placement with a grievance relating to their employment/placement have access to this policy helping them to resolve their grievances as quickly and as fairly as possible.

2. Informal Discussions

If you have a grievance about your employment/placement you should discuss it informally with a Director of the company. We hope that the majority of concerns will be resolved at this stage.

3. Stage 1

If you feel that the matter has not been resolved through informal discussions, you should put your grievance in writing to the Director of Student Experience and Enhancements. If your grievance relates to the Director of Student Experience and Enhancements, your grievance should be put in writing to another Director of the company. The Director will give a response within 5 working days in an endeavour to resolve the matter.

4. Stage 2

If the matter is not resolved, you may raise the matter again, in writing, with the Director of Student Experience and Enhancements, who will meet with you to give you a response within 5 working days. You may be represented or accompanied at this meeting by a fellow worker of your choice or by a union official.

5. Stage 3

If the matter is not resolved to your satisfaction, you should put your grievance in writing to the Principal or an authorised deputy. You will be entitled to have a meeting with the Principal or his/her authorised deputy to discuss the matter. The Principal or authorised deputy will give his/her decision within 7 working days of the grievance being received.

The Principal's decision is final.

OLC (Europe) Ltd. Disciplinary Procedure

1. Purpose and scope of the procedure

In the event of poor performance or misconduct, OLC (Europe) Ltd will aim to provide the support necessary to facilitate improvement. This procedure sets out the actions which will be taken when such issues arise. The procedure is applicable to all employees, associates and OLC students on placement with the organisation.

2. Principles

If you are subject to disciplinary action:

- The procedure is designed to establish the facts quickly and to deal consistently with disciplinary issues. No disciplinary action will be taken until the matter has been fully investigated;
- At every stage you will be advised of the nature of the complaint;
- You will be given the opportunity to state your case, and be represented or accompanied by a colleague of your choice;
- You will not be dismissed for a first breach of discipline except in the case of gross misconduct, when the penalty will normally be dismissal without notice and without pay in lieu of notice;
- You have a right to appeal against any disciplinary action taken against you;
- The procedure may be implemented at any stage if your alleged misconduct warrants such action.

3. Informal Discussions/Counselling

Before taking formal disciplinary action, Director of Student Experience and Enhancements will make every effort to resolve the matter by informal discussions with you. Only where this fails to bring about the desired improvement should the formal disciplinary procedure be implemented. You will be given the opportunity to state your case, and be represented or accompanied by a colleague of your choice.

The Procedure

4. Formal Verbal Warning

If, despite informal discussions, your conduct or performance does not meet acceptable standards, you will be given a formal verbal warning by the Director of Student Experience and Enhancements or Director of Teaching, Learning and Assessment Enhancements of the company. You will be told:

- the reason for the warning
- that this warning is the first stage of the disciplinary procedure
- that you have a right of appeal

A brief note of the warning will be kept in your personal file but it will lapse after 6 months, subject to satisfactory conduct and/or performance.

5. Written Warning

If there is no improvement in standards, or if a further offence occurs, a written warning will be given. This will state the reason for the warning and a note that, if there is no improvement after 3 months, a final written warning will be given. A copy of this first written warning will be kept on file but the warning will lapse after 12 months subject to satisfactory conduct and/or performance.

6. Final Written Warning

If your conduct or performance remains unsatisfactory, or if the misconduct is sufficiently serious to warrant only one written warning, then a final written warning will be given making it clear that any recurrence of the offence or other serious misconduct within a period of 12 months will result in dismissal. A copy of the warning will be kept on file but the warning will lapse after 12 months subject to satisfactory conduct and/or performance this can only be issued by the Principal.

7. Dismissal

If there is no satisfactory improvement or if further serious misconduct occurs, you will be dismissed.

8. Gross Misconduct

If, after investigation, it is deemed that you have committed an offence of the following nature (the list is not exhaustive), the normal consequence will be dismissal:

- theft, fraud, deliberate falsification of company documents
- fighting, assault on another person
- willful damage or negligence that leads to damage to property belonging to the company, its customers, its suppliers or other employees
- sexual or racial harassment
- being unfit for work through alcohol or illegal drugs
- gross negligence
- gross insubordination
- actions which endanger the Health and Safety of any other person whilst at work
- refusal to work
- actions which bring the reputation of the company into disrepute

While the alleged gross misconduct is being investigated, you may be suspended, during which time you will be paid your normal salary. Such suspension is not to be regarded as a form of disciplinary action and will be for as short a period as possible. Any decision to dismiss will be taken only after a full investigation. If you are found to have committed an act of gross misconduct, you will be dismissed without notice or payment in lieu.

9. Appeals

If you wish to appeal against any disciplinary decision, you must appeal, in writing within five working days of the decision being communicated to you to the Director of Student Experience and Enhancements. If possible, another Director or Manager who was not involved in the original disciplinary action will hear the appeal and decide the case as impartially as possible.

OLC (Europe) Ltd. Information Technology Policy

In order to keep our IT based business systems running smoothly the following guidelines should be adhered to by all Staff, Associates and Members of OLC (Europe) Ltd.

- Always run a Virus checker and ensure that its 'automatic update' function has been activated
- Do not install illegally copied software or programs downloaded from non-reputable sources (e.g. Internet downloads) onto your PC
- Ensure that your PC is password protected - this will keep your data safe from prying eyes
- Do not write your PC or OLC server access passwords down and don't divulge them to anyone
- Develop an electronic file storage system that you find easy to use and that makes it easy for you to back up your important files
- If you are sending out OLC correspondence via email then always use your@olceurope.com email address
- Back up your important files on a regular basis
- If you do not know how to back up your files seek help from the Director of Marketing, MIS and Infrastructure
- Ensure that you comply with the requirements of the Data Protection Act 2018

Anyone processing personal data (data that refers to an identifiable individual rather than to an organisation) must comply with the eight legally enforceable principles of good practice laid down in the Act. These principles say that data held in a filing system (even a paper based system) through which an individual can be identified must be:

- fairly and lawfully processed;
- processed only for reasonable purposes;
- adequate, relevant and not excessive;
- accurate;
- not kept longer than is necessary;
- processed in accordance with the data subject's rights;
- held securely;
- not transferred to countries without adequate 'data protection' as defined within the Act.

Remember that under the Act 'personal data' covers both facts and opinions about an individual. It also includes information regarding the intentions of OLC (Europe) Ltd towards that individual. If you are not sure whether the data you have on your PC complies with the Act then discuss this with the Director of Marketing, MIS and Infrastructure and find out - OLC's compliance is our joint responsibility.

Do not download and save pro-formas from the server for your future reference - the server always contains the most up to date copy of our forms and documents; if you need to use a form download it 'fresh' every time to ensure that you're using the correct version.

If you do not understand this information or our policy speak to Director of MIS, Infrastructure, Quality & Standards and ask for assistance.

**OLC (Europe) Ltd.
Appraisal System - Appraisal Guidance Notes**

Appraisals are held annually. They are a two way process involving both the employee and the appraiser (usually an OLC Director). It is the responsibility of both parties to ensure that the appraisal system is utilised.

The appraisal system (refer to figure 1) has been designed to give both the employee and appraiser full opportunity to regularly;

- Reflect on past achievements
- Review on-going performance
- Set objectives for the next 6 months (and possibly beyond)
- Establish how OLC can help the employee meet those objectives
- Provide feedback to the employee

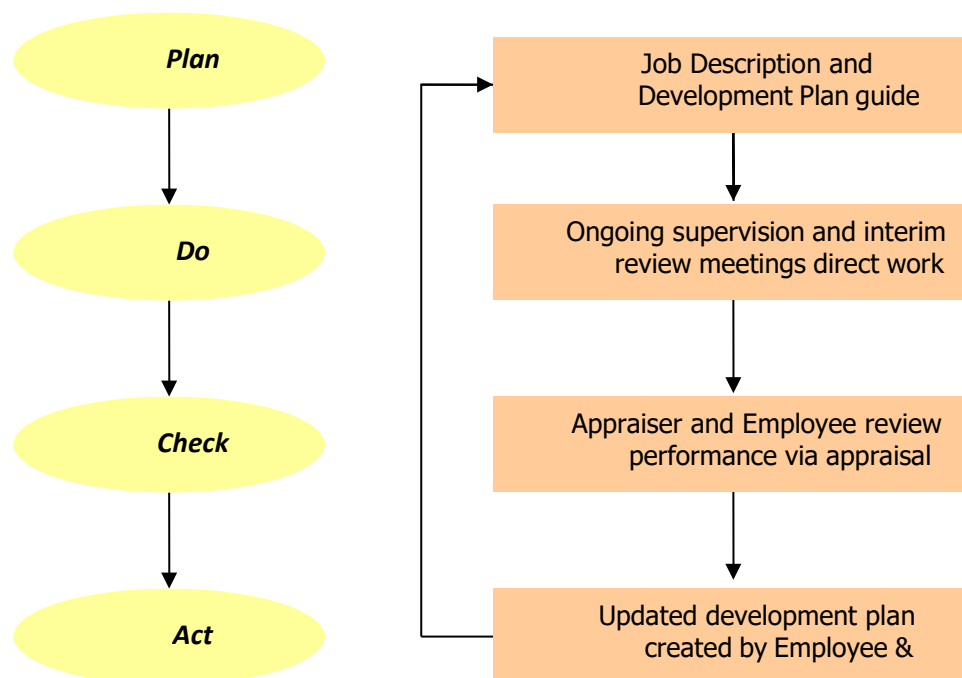


Figure 1 – The Appraisal & Development Process

Before the Appraisal:

The employee and appraiser must agree a date for the appraisal meeting. While everything discussed within the appraisal is confidential, the employee is welcome to have a colleague or representative attend the appraisal meeting with them if they so choose. If the employee would like somebody to accompany them to their appraisal meeting, they should make the appraiser aware of this at least 5 days before the appraisal meeting is due to be held.

During the Appraisal Meeting:

The appraiser will facilitate discussions around the areas contained within Part One of the appraisal form. Based upon these discussions the appraiser and employee will agree over what period the development goals and objectives relate to and agree an action plan for their completion. A date for the next appraisal meeting and any interim review meetings must be set during the appraisal meeting. Part One of the form will then be given to the employee so that they can review its contents and make appropriate comments. If the employee strongly disagrees with its contents the opinion of another Director of OLC should be sought. That Director will mediate between the appraiser and employee in order to facilitate an agreement between the two.

After the Appraisal Meeting:

The employee must review Part One of the appraisal form and add any comments they feel appropriate. Part One of the form should then be returned to the appraiser within 2 weeks of the appraisal meeting. The employee must also complete Part Three of the appraisal form to record their proposed on-going personal development, goals, objectives, measures of success and deadlines for the coming period. Part Three must then be given back to the appraiser within 2 weeks of the initial appraisal meeting so that the proposed action plan can be reviewed and agreed. A further review meeting to discuss the newly developed personal development plan should be held within 1 week if this is felt appropriate by either the employee or appraiser. A copy of Parts One and Three of the appraisal form will then be given to the employee. All original documents will be filed within the employee's personnel file. These documents will form the basis of the employee's on-going personal development and the next appraisal meeting.

Self appraisal

Name

Department

Date of appraisal __/__/__

Your next Appraisal Meeting will take place on:

Date: __/__/__

Time: xx:xx

Place

Purpose of the Appraisal Meeting

To enable you to discuss, with your manager, your job performance and your future. The discussion should aim at a clearer understanding of:

- (a) The main scope and purpose of your job
- (b) Agreements on your objectives and tasks
- (c) Standards or targets for measuring your performance
- (d) Your training and future prospects

You can prepare for the meeting and discussion by completing this form.

You may show this form to your manager. This will give him or her time to consider your problems and suggestions. If you do so, it will not be copied or filed without your permission.

If you prefer, you can use this form for your own guidance only, and not show it to anyone.

You will be given the opportunity to read the appraisal form prepared by your manager; you will be able to add your comments, and sign the appraisal form.

Bring to the appraisal meeting:

- your current job description
- your current action plan

Self appraisal

Name

1. Circle appropriate answers, and comment below

(a) Do you have an up-to-date job description? Yes No

(b) Do you have an up-to-date action plan? Yes No

(c) Do you understand all the requirements of your job?
 Yes No

(d) Do you have regular opportunities to discuss your work, and action plans?
 Yes No

(e) Have you carried out the improvements agreed with your manager which were made at the last appropriate meeting?
Yes No

2. What have you accomplished, over and above the minimum requirements of your job description, in the period under review (consider the early part of the period as well as more recent events)? Have you made any innovations?

.....

3. List any difficulties you have in carrying out your work. Were there any obstacles outside your own control which prevented you from performing effectively?

.....

4. What parts of your job, do you:

(a) do best?

.....

(b) do less well?

.....

(c) have difficulty with?

.....

(d) fail to enjoy?

.....

5. Have you any skills, aptitudes, or knowledge not fully utilised in your job? If so, what are they and how could they be used?

.....

6. Can you suggest training which would help to improve your performance or development?

.....

7. Additional remarks, notes, questions, or suggestions

.....

Appraisal form

Use this model form to record the issues discussed at an employee's performance appraisal meeting.

Employee's name:	
Job title:	
Department:	
Date of engagement:	
Manager:	
Date of meeting:	
Current performance	
<p>Objective/competence 1: This section should be used to record discussion on the key areas of the job, and include a summary of achievement against the objectives that have been previously agreed.</p>	
<p>Objective/competence 2:</p>	
<p>Objective/competence 3:</p>	
<p>Development summary: This section should be used to record any areas of the employee's work where further training and support is required, and any areas where performance is particularly strong and should be developed further.</p>	
<p>Development and training This section should list specific requirements for any training or development. These activities are not restricted to training courses, and may include attachments, projects, coaching, planned experience or any other suitable activity that will enhance the skills, knowledge and behaviour required in the employee's work or to develop him/her further.</p>	
<p>Career planning This section should record any areas of the department or Company in which the employee has expressed a specific interest.</p>	
<p>Other areas of discussion This section should record any other points raised at the appraisal meeting.</p>	
<p>Assessment Level This is based on performance over the year against objectives achieved</p>	
<p>Outstanding performance (Objectives exceeded and competencies more than fully demonstrated)</p>	
<p>Standard performance (Objectives met and competencies fully demonstrated at required levels)</p>	
<p>Less than standard performance with development needs (Most objectives met but development required to fully meet all objectives)</p>	

Unsatisfactory performance (Performance unacceptable; objectives not met and competencies not demonstrated)	
Employee's signature:	
Appraiser's signature:	
Date:	
Reviewing manager's signature:	
Date:	
One copy of this completed form will be kept by the appraiser, one by the appraisee and one in the employee's personnel file.	

OLC (Europe) Ltd. Dress Code

OLC operates a sensible dress policy. The policy applies to all staff. The Dress Code is necessary in order to: present a smart and professional image, thereby increasing student and public confidence. Staff also must have regard to health and safety considerations on attire worn.

OLC considers the way employees dress and their appearance to be of significant importance in portraying a corporate and professional image to all users of its service, whether students, visitors, or colleagues. OLC recognises the diversity of cultures, religions and disabilities of its employees and will take a sensitive approach when this affects dress and uniform requirements. However, priority will be given to achieving the overall aims and objects of the policy itself

The Dress Code Policy is designed to guide managers and employees on the application of OLC standards of dress and appearance. The policy is not exhaustive in defining acceptable and unacceptable standards of dress and appearance and staff should use common sense in adhering to the principles underpinning the policy. All employees are supplied with an identity security badge which must be worn and visible in all areas, and available at all times when on duty or acting in an official capacity representing OLC.

All staff are required to comply with the principles of the Dress Code Policy. Failure to adhere to OLC's standards of dress and appearance may constitute misconduct and may result in formal disciplinary proceedings. Employees are responsible for following the standards of uniform/dress and appearance laid down in this policy and should understand how this policy relates to their working environment; health and safety, during the course of their employment.

The directorate are responsible for ensuring the Dress Code Policy is adhered to at all times in respect of the employees they manage.

Dress Code

Employers are given the following general guidelines in respect of acceptable staff clothing include:

- skirts, blouses, smart T-shirts, jumpers, jackets, dresses, culottes, suits, trousers, slacks.
- business suits, sports jackets, blazers, trousers, smart T-shirts, shirts (with collars -long or short sleeve) jumpers.

The following is a general guideline of Non acceptable Clothing:

Casual trousers or skirts including denim (all colours and styles), tracksuits, casual sports T-shirts, leisure shorts, combat trousers, sweatshirts, baseball caps/hats, overly tight or revealing clothes, including mini-skirts, low cuttops or those revealing the midriff and clothing bearing inappropriate slogans. Trousers or skirts that are of a length that they touch the ground when walking are not acceptable on safety grounds, in some areas of campus buildings.

Footwear: No flip flops, sliders, trainers,

Offense tattoos should be covered

Date Reviewed: 22/02/2023 Next Review Date: 28/02/2024

**OLC (Europe) Ltd.
Anti-Slavery Policy**

Policy Contents

8. Introduction
9. Purpose
10. Scope and Supply Chain
11. Underlying Philosophy
12. Corporate Objectives and Training
13. Responsibilities and Reporting
14. Policy Monitoring and Review

1. Introduction

OLC (Europe) Ltd, as a member of the international business and academic community, recognises its corporate social responsibility commitments in its various roles, which include education and trainer, adviser and consultant, researcher and knowledge creator and employer and consumer. We reflect these commitments within this anti-slavery policy and in a family of policies and statements.

We recognise that our businesses activities have direct and indirect impacts on the societies in which we operate. We endeavour to manage these in a responsible manner, believing that sound and demonstrable performances in relation to anti-slavery, policies and practices are a fundamental part of our business success.

This policy is developed with recognition of The Modern Slavery Act 2015 and sets out the steps that OLC has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. OLC has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain. Related and supporting OLC policies include:

- Grievance Policy
- Corporate Social Responsibility Policy
- Communications Policy
- Equal Opportunities Policy and;
- Staff Handbook

2. Purpose

The purpose of the policy is to make clear to all stakeholders what we mean by anti-slavery and how we work towards achieving it. The policy includes simple summary statements drawn from fuller policies on these topics, which, in our opinion, constitute modern slavery. The policy provides stakeholders with a statement of our commitments under a family of corporate social responsibility policies.

3. Scope and Supply Chain

The anti-slavery policy applies throughout the OLC (Europe) Ltd group and operations and governs our approach to all our activities. Governance of our approach to ethical business is demonstrated within the OLC (Europe) Ltd Business System Model.

The OLC supply chain includes educational supplies, partner public colleges and Higher Education Institutes. We also work with a number of student recruitment agents, educational consultancies and community champions that help us recruit new students. OLC recognises that we can have a positive influence on these supply chain stakeholders and we carry out checks and due diligence monitoring so that we can be better informed of modern slavery risks and we will reserve the right to end our relationship with them if there is deemed to be a modern slavery risk.

4. Underlying Philosophy

OLC (Europe) Ltd believes that a responsible approach to developing relationships between companies and the communities they serve, global or local, is a vital part of delivering business success. How we interact with the world in which we operate determines our place within it. This is in line with our statement of corporate social responsibility and represents a first step into defining OLC's view and will be developed over time. Our philosophy is encapsulated in our Vision, Mission and Goals detailed in the business system Model.

5. Corporate Objectives and Training

To provide a reference point to guide employees, students and stakeholders on the values which drive the conduct of our business and relationships with the world we operate we develop corporate objectives each year at the annual review. That annual review results in development and publication of strategic plan, which is the guiding force for our operations.

OLC pay all our staff the national minimum wage rate or above set by the UK Government and academic associates have contractual agreements outlining their roles, responsibilities and fee expectations. The staff handbook sets out the expectations and rules for working within the OLC group.

6. Responsibilities and Reporting

The Managing Director is the main board director with primary responsibility. Stakeholders, particularly employees and students, are invited to provide feedback on the nature and operation of the anti slavery policy. Our communications policy encourages complaints and feedback so our students and staff know they can report actual or suspected incidents of modern slavery without fear of retribution.

OLC provide information, training and appropriate knowledge to staff so they have an understanding of the risks of modern slavery and know how to report any concerns or issues.

Any reported incidents, complaints or issues raised regarding actual episodes of modern slavery or the potential risks of modern slavery are recording in the Board of Directors meeting minutes and will be handled by the Board members.

7. Policy Monitoring and Review

This policy is monitored in order to ensure that it remains relevant. Full review of the policy occurs annually.

This version of the Anti Slavery Policy was approved on: 11/03/2018

Reviewed by Dr Chris: 12/03/2019

Reviewed by Dr Chris: 22/05/2020

Reviewed by Dr Chris: 17/02/2021

Reviewed by Dr Chris: 10/03/2022

Reviewed by SMT: 28/03/2024

OLC (Europe) Ltd
Anti- Bribery, Anti-Fraud And Anti-Corruption Policy

Policy Contents

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10. Risk Assessment
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1. Statement of Intent/Scope and Purpose

The College has a zero-tolerance for bribery and corruption. The College's reputation with the community it serves and other stakeholders is underpinned by ethical behaviour, financial probity and honesty.

The College aims to limit its exposure to bribery by:

- 1.1** Setting out this document as their clear anti-bribery policy, which is proportionate to the risks that the College is exposed to;
- 1.2** Embedding awareness and understanding of the College's anti-bribery policy amongst all staff, "associated persons" (any person performing services for or on behalf of the College), and external persons/organisations with whom the College has commercial relations;
- 1.3** Training staff as appropriate so that they can recognise and avoid the use of bribery by themselves and others;
- 1.4** Encouraging staff to be vigilant and to report any suspicion of bribery, providing them with suitable channels of communication (as defined in the College's Whistleblowing Policy) and ensuring sensitive information is treated appropriately;
- 1.5** Rigorously investigating instances of alleged bribery in accordance with the College disciplinary procedure; and assisting the Police and other appropriate authorities in any resultant prosecution;

1.6 Taking firm and vigorous action against any individual(s) involved in bribery.

This policy applies to all employees and anyone acting for, or on behalf of, the College (“associated persons”), including executives, directors, other volunteers, temporary workers, consultants and contractors.

2. Responsibilities

The Managing Director has overall responsibility to ensure that procedures are in place to minimise the possibility of the occurrence of bribery or corrupt activities in the College and to report and take action in the case of any incidents. The Managing Director is supported by the Executive Directors and Directorate Senior Management Team and Accountant in ensuring adequate procedures are in place and monitored.

3. Considerations for Policy

The relevant legislation behind this policy is The Bribery Act 2010 which came into effect on 1st July 2011.

It applies to ‘relevant commercial organisations’ any organisation which is incorporated in the UK irrespective of where it carries out business and whether or not it pursues primarily charitable or educational aims. **Colleges will definitely be covered by the Act if they engage in commercial activities but given the scope of the Act, colleges are strongly advised [AoC] to err on the side of caution and to assume the Act applies across the full range of activities.** Executive Directors, Directors and Senior Officers of an organisation can be personally liable if bribery involving the organisation is committed with their ‘consent or connivance’.

Bribery convictions can carry unlimited fines for corporations and individuals and incumbents can also face up to 10 years imprisonment.

4. Risk Assessment

Failure of the policy could have significant financial and reputational implications for the College. The controls and mitigating actions applied by the College include the existence of robust policies and procedures covering all key aspects of the College’s operations, an organisation with clear accountability and responsibilities, segregation of duties where possible, internal audits and a whistleblowing policy.

5. The Policy

All employees and associated persons (i.e. persons providing services to the College such as sub-contractors, consultants and suppliers) are responsible for maintaining the highest standards of business conduct and are expected to behave honestly and with integrity. Any breach of this policy will constitute a serious disciplinary offence, which may lead to dismissal and may become a criminal matter for the individual.

The College prohibits employees and associated persons from offering, giving, soliciting or accepting any bribe. The bribe might include cash, a gift or other inducement, to or from any person or organisation, wherever they are situated, and irrespective of whether or not they are a public official/body or private person or company, by any individual governor, employee, agent or other person or body acting on the College's behalf.

The bribe might be made in order to:

- 5.1** Gain any commercial, contractual or regulatory advantage for the College in a way which is unethical;
- 5.2** Gain any personal advantage, pecuniary, or otherwise, for the individual or anyone connected with the individual.

This policy is not intended to prohibit appropriate corporate entertainment and/or hospitality undertaken in connection with the College's business activities, provided the activity is customary under the circumstances, is proportionate, and is properly recorded/disclosed to the College.

Employees and associated persons are requested to remain vigilant in preventing, detecting and reporting bribery. Employees and associated persons are expected to report any concerns regarding any suspected bribery in accordance with the College's procedures.

6. Policy Evaluation, Reporting and Monitoring

The actions to be undertaken in the case of a suspected instance of bribery or other potentially corrupt activity or financial irregularity are laid out in the Financial Policies (Annex 7 to the BSM):

- The Fraud Response Plan requires the formation of a Project Group to undertake a special investigation.
- The Project Group will provide a confidential report to the Managing Director, the Director of Marketing, MIS and Infrastructure and the Board of Directors meeting.
- The circumstances in which the College must inform any funding body, partner or stakeholder about actual or suspected frauds and other financial irregularities are detailed in the funding body's audit code of practice. The Managing Director is responsible for informing the funding body of any such incidents.
- **Any incident matching the criteria in the funding body's audit code of practice shall be reported without delay by the Managing Director to the chairs of both the Board of Directors Meeting and the Director of Marketing, MIS and Infrastructure. On completion of the special investigation, a written report shall be submitted.**

7. Equality and Diversity Statement

OLC College welcomes and celebrates equality and diversity. We believe that everyone should be treated equally and fairly regardless of their age, disability, gender, gender identity, race, religion or belief, sexual orientation and socio-economic background. We seek to ensure that no member of the College community receives less favourable treatment on any of these grounds which cannot be shown to be justified.

This document is written with the above commitment, to ensure equality and diversity is at the centre of working life at OLC College.

8. Safeguarding Policy

OLC College recognises its moral and statutory responsibility to safeguard and promote the welfare of students. We work to provide a safe and welcoming environment where students are respected and valued. We are alert to the signs of abuse, neglect, radicalisation and extremism and follow our procedures to ensure our students receive effective support, protection and justice. OLC College have published their safeguarding policy which is available to all stakeholders on the OLC website.

This policy will be formally reviewed every three years.

This document is designed for viewing through the College Intranet: i.e. The Business System Manual. Printed copies, although permitted, are deemed uncontrolled. Please refer to the College Intranet for the latest version.

Anti Bribery Anti-Fraud and Anti-Corruption

This version of the Policy was approved by Dr Chris Bamber on: 15/02/2018

Reviewed by: Dr Chris Bamber 03/11/2022

Signed: _____ Dr Chris Bamber

1st Issued Date: XXXX

Date Reviewed: 28/03/2024 **Next Review Date:**28/02/2025

Policy Approval and Sign Off

The undersigned hereby agree and ratify the following documents:

- | | (Tick) |
|---|--------------------------|
| 1. Grievance Policy | <input type="checkbox"/> |
| 2. Equal Opportunities Policy | <input type="checkbox"/> |
| 3. Corporate Social Responsibility Policy | <input type="checkbox"/> |
| 4. Health and Safety Policy | <input type="checkbox"/> |
| 5. Disability Strategy | <input type="checkbox"/> |
| 6. Environmental and Sustainability Policy | <input type="checkbox"/> |
| 7. Humanitarian and Charity Policy | <input type="checkbox"/> |
| 8. Refund Policy | <input type="checkbox"/> |
| 9. Email, Internet, IT, Social Media and IT Security Policy | <input type="checkbox"/> |
| 10. Quality Policy | <input type="checkbox"/> |
| 11. Staff Handbook | |
| • Annual Leave Policy | <input type="checkbox"/> |
| • IT Policy Summary | <input type="checkbox"/> |
| • Disciplinary Policy | <input type="checkbox"/> |
| • Complete Staff Handbook | <input type="checkbox"/> |

Date of Policy Approval:

Date of Last Review:

Date of Next Review:

Managing Director

Dr Chris Bamber
PhD MSc MasQFCollIT