Organisational Learning Centre

HE College of Excellence

OPERATIONAL POLICIES (Annex 3 to the BSM)

Created: 12/09/1998

Reviewed: 28/02/2026

To be Reviewed: 28/02/2027

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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 andteaching 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 inour 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:** 06/03/2026 **Next Review Date: 28th** Feb 2027

Bolton Campus	Manchester Campus	Oldham Campus	London Campus
Old County Police Station, 66 Castle Street, Bolton, BL2 1AE	**Montague House, Unit 1 Matthew's Street, Manchester, M12 5BB**	**Unit 450, Chambers Business Centre, Chapel Road, Oldham, OL8 4QQ**	**Ebenezer House, 726 – 728 Seven Sisters Road, London, N15 5NH**
Tel: +44 (0) 1204 525511	**Tel: +44 (0) 161 228 3077**	**Tel: +44 (0) 161 2436336**	**Tel: +44 (0) 208 8006621**

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 haveresponsibility in the following areas:

Name	Responsibility
C Bamber & Y Motara	Policy setting and reviewing
Y Motara	Premises
N Akrami	Student Welfare and Safety
Programme Managers	Induction of Students, Associates and Employees
Programme 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, Chris Bamber, 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.

Consultation with employees & students

Employee representatives are:

Nooshin Akrami

Senior leadership and senior Management staff with employees
Consultation with employees is provided by:
Weekly ASM and huddle meetings and monthly one-to-one review.
Nooshin Akrami is responsible for the management of student welfare and safety.

Safe plant and equipment

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

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 with need a COSHH assessment. Y 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 COSHHassessments.

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 us soonest.

Information, Instruction and Supervision

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

Health and Safety advice is available from Y Motara.

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

their line manager.
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 assessment specifies more stringent controls.

Competency for Tasks and Training

Induction training for all employees will be provided by and 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 marshal 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.

All incidents, 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 training.

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 illhealth 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 ill be supported by Dr C Bamber and guided by M Mann using the HM Government “Fire Risk Assessment: educational premises” publication ref: 05 FRSSD 03338.

Escape routes are checked by J Turner and B Walker every week.

Fire extinguishers are maintained and checked by Walker Riskas Fire Protection or other qualified interested employees.

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, BL2 1AE.

Daily appointed fire marshal, first aider and office manager is shown in the front lobby reception area of Montague House, Matthews Street, 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, 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. First aid personnel and fire marshals are appointed daily from a designated list of trained staff members who are trained to carry out these responsibilities.

This list is appointed personnel are displayed in the reception area at each of our campuses to ensure visibility and quick access in the event of an emergency. The list is reviewed and updated daily by the student services team to ensure appropriate coverage at all times.

Additionally, each campus has a designated staff member with allocated campus management responsibilities to oversee day-to-day operations and ensure the smooth running of the site.

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 in the infrastructure team site.

Date of amendment	Description of changes
06/03/2026	Added Joe Turner as competent in PAT testing
28/08/2025	Updated: First Aid personnel and Fire Marshals are selected daily from a designated list of trained staff members who are trained to carry out these responsibilities.
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	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, Olutunde Akingbehin, 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 Mraes, Charlene Pattison, Jane Kear, and Paul Bamber.
18/02/2021	Removed Chris Bateman from all responsibilities.
20/02/2020	Removed Mark Milaszewicz responsibility for personnel responsibilities and replaced with Julie Semmens.
20/03/2020	Removed Johnathan Saunders, Simon Nuttall-Worral, Ashley Eubank responsibility for H&S, fire safety risk assessments and replaced with Greg Paton.
28/03/2019	Added Johnathan Saunders responsibility for fire safety risk assessments.
28/03/2019	Removed EETTEC Ltd from text.
28/03/2019	Added Montague House premises and removed Express Network premises.
28/03/2019	Removed Jil Peacock responsibilities.
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 Ed Bamber and Dez 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.

OLC (Europe) Ltd
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;

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

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

2.2 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 (monthly)
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.

2.3 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.

2.4 Duties of the Fire Warden

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

- To be familiar with all exit routes from the building in which they normally work
- To advise others on exit routes
- 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
- Instruct personnel in the area in which they find themselves to vacate the building pausing only to make any equipment safe
- Guide personnel along exit routes and help those whose routes are obstructed to find alternative routes
- 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
- 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
- Report the successful evacuation of their area of responsibility to the Senior Staff Member present who is responsible for evacuation.

2.5 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.

2.6 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 under taken 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.

2.7 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 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.

2.8 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.

2.9 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
- Online fire safety training

The College's on-line fire safety training course is available within Core . 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.

Table 1: Fire Risk Assessment Frequency

Risk Category	Building Name	Fire Risk Assessment Review Frequency
Moderate	66 Castle Street, BoltonCampus	Annually
Moderate	Montague House, GreaterManchester Campus	Annually

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 The Director of Marketing, MIS and Infrastructure /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 and Lancashire Fire and Safety

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 Director of Marketing, MIS and Infrastructure /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. 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: 06/03/2026. 13/03/2026 To be reviewed: 28/02/2026
----------end of policy document----------

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 Teaching, Learning and Assessment. If your grievance relates to the Director of Teaching, Learning and Assessment, 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: 27/02/2026. To be reviewed: 28/02/2027

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 favorable 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 Flexible Working, 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: 15/01/2026. To be reviewed: 15/02/2027

OLC (Europe) Ltd
Corporate Social Responsibility (CRS) 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: 06/03/2026. To be reviewed: 28/02/2027

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 recognise 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 with no exceptions.
- Make reasonable adjustments where appropriate to support staff and students' experience.

3. Provisions

In Order to meet its responsibilities OLC (Europe) Ltd provides the following:

- The Head of Student Experience and Enhancements is responsible for the wellbeing of students and staff, overseeing SEE team support who facilitate relevant reasonable adjustments and academic support when these required.
- We bridge access to our franchised partner Universities' provisions for our students.
- We may access third-part support to ensure our students are not disadvantaged where appropriate

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: 16/01/2026. To be reviewed: 16/01/2027.

OLC (Europe) Ltd
Environmental and Sustainability Policy

Policy Contents

1. Introduction
2. 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;

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: 06/03/2026. To be reviewed: 28/02/2027

OLC (Europe) Ltd

Refund and Compensation Policy

Policy Contents

1. **Policy Statement**
2. **Cancellations**
3. **Refunds**
4. **Compensation Entitlements**
5. **Exclusions and Limitations**
6. **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 is a separate agreement, the terms of that agreement apply. The policy ensures compliance with OfS Conditions C1–C3, the Consumer Rights Act 2015, Competition and Markets Authority (CMA) guidance for Higher Education providers (2021), and relevant consumer legislation.

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 until 14 days after they agree to study on the course.

3. Refunds

Fee refunds are only made in the following circumstances:

- Withdrawal before course start date: 100% refund of tuition fees paid (excluding non-refundable deposits unless OLC cancels the course).
- Withdrawal within 14 days of enrolment: Full refund under Consumer Contracts Regulations 2013 cooling-off period.
- Provider-initiated course cancellation: 100% refund of fees paid for the cancelled course.
- Mid-year course closure with no alternative: Pro-rata refund for undelivered tuition and unfulfilled services.
- Provider failure / OfS deregistration: Full refund of prepaid tuition and support for transfer where possible.

4. Compensation Entitlements

- Additional costs (e.g. travel, relocation, accommodation) incurred due to provider action.
- Delay in course completion caused by institutional disruption.
- Loss of academic opportunity (e.g. cancelled placement or module) that cannot be rescheduled.
- Loss of time or inconvenience arising from administrative error or misrepresentation.

Compensation levels will be assessed case-by-case, considering financial loss, duration of disruption, alternative support offered, and the student's stage of study.

5. Exclusions and Limitations

- Events wholly beyond OLC Europe's reasonable control (force majeure).
- Loss of personal earnings or future income expectations.
- Dissatisfaction with academic judgement or grades.
- Failure to engage or attend as required.

6. 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 and Compensation Policy was approved on: 20/10/2025.
Last review: 06/03/2026. To be reviewed: 28/02/2027

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 organisations 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 fundraising events each year;
- Adopt a systematic approach to the support of local, national and international charities;

More specifically, OLC (Europe) Ltd will:

- Each year organise a number of charities 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, not withstanding 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 

This version of the Humanitarian and Charitable Policy was approved on: 01.03.2007.

Last review: 06/03/26. To be reviewed: 28/02/27

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:

(NAME)

(JOB TITLE)

Email:

Tel: +44 (0) 1204 525511

Website: https://olceurope.com
Our Courses: https://olceurope.com/courses

Refer a Friend: https://olceurope.com/refer-a-friend



This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error, please notify the system manager. This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute, or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. If you are not the intended recipient you are notified that disclosing, copying, distributing, or taking any action in reliance on the contents of this information is strictly prohibited. OLC (Europe) Ltd. www.olceurope.com

REPLYING TO EMAILS

Emails should be answered within at least 2 working days, 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 '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 '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 as legally 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 will face 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.

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 systems to 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 or given 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 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 one drives 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 or core 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 Director of Marketing, MIS and Infrastructure will notify the Board of Directors summarising any changes to IT infrastructure. an

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 Director of Marketing, MIS and Infrastructure /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.

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."

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 issue 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 to 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'.

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: _

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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, using the QAA UK Quality Code for Higher Education and the Office for Students conditions 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: 13/03/2026. To be reviewed: 28/02/2027

OLC (Europe) Ltd
Handling of DBS Certificate Information Policy

Policy Contents

1. General Principles
2. Storage and Access
3. Handling
4. Usage
5. Retention
6. Disposal
7. Acting as an Umbrella Body

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, OLC (Europe) Ltd 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.

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.

3. Handling

In accordance with section 124 of the Police Act 1997, certificate information is only passed on 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.

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.

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 safe storage and strictly controlled access will prevail.

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.

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.

This version of the Quality Policy was approved on 28/02/2024.
Last review: 15/01/2026. To be reviewed: 28/02/2027

- 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), OLC (Europe) Ltd 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 OLC (Europe) Ltd 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, OLC (Europe) Ltd 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.

This version of the Quality Policy was approved on 28/02/2024.
Last review: 28/02/26. To be reviewed: 28/02/2027

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/ w hen 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 or 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 staff handbook			

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)			
A completed DSE form			

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/notice boards/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 three weeks			
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

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 manger 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. Unused 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 the 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 more than 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 days' 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 months' 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 33 days your holiday entitlement would be;

33 X 9/12ths = 25 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.

Last review: 28/02/2026. To be reviewed: 28/02/2027

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 lasting at least 5 working days, during a rolling 12-month period.

Thereafter employees will be paid at the contact statutory sick pay rate.

Last review: 28/02/2026. To be reviewed: 28/02/2027

OLC (Europe) Ltd
Disciplinary Procedure

Policy Contents

1. Purpose and Scope of the Procedure
2. Principles
3. Short Service Staff
4. Informal Discussions/Counselling
5. Formal Verbal Warning
6. Written Warning
7. Final Written Warning
8. Dismissal
9. Gross Misconduct
10. Appeals

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. Short Service Staff
We retain discretion in respect of the disciplinary procedures to take account of your length of service and to vary the procedures accordingly. If you have a short amount of service, you may not be in receipt of any warnings before dismiss

4. Informal Discussions/Counselling

Before taking formal disciplinary action, the Line Manager 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.

5. 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 your Line manager or Director of Teaching, Learning and Assessment . 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.

6. 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.

7. 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.

8. Dismissal

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

9. 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.

10. 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. If possible, a Director or Manager who was not involved in the original disciplinary action will hear the appeal and decide the case as impartially as possible.

Last review: 07/10/26. To be reviewed: 28/02/2027

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 down your PC or OLC server access passwords 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 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.

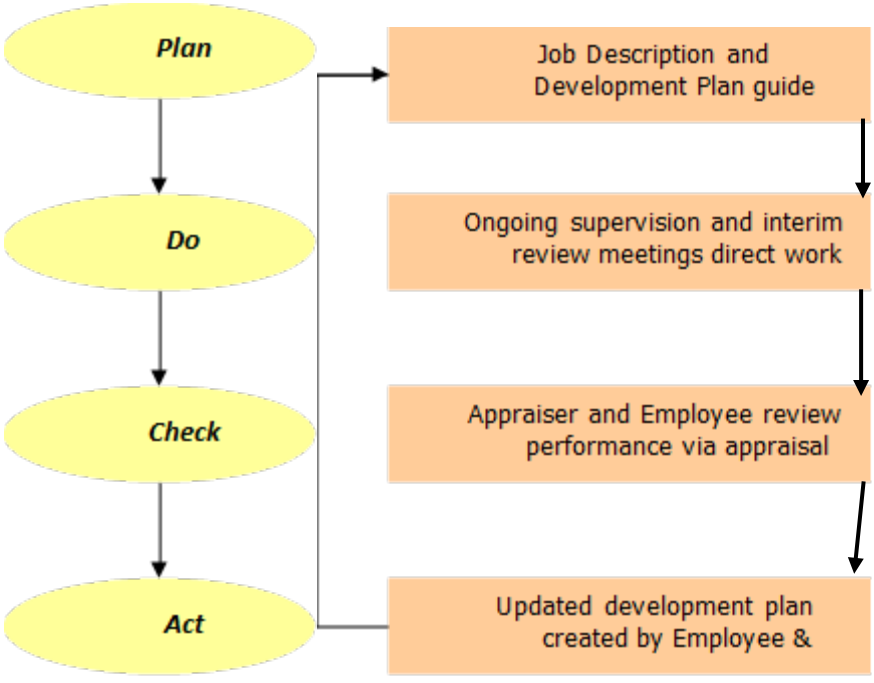
OLC (Europe) Ltd
Appraisal System – Appraisal Guidance Notes

Appraisals are held annually. They are a two-way process involving both the employee and the appraiser (usually an OLC Director, Head of School or Manager). 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 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 the employee element 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. Appraisal forms will be stored on BrightHR so that the employee 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 appraiser should complete the template on BrightHR and inform the employee when this has been done.. 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. All original documents will be filed within the employee's personnel file on BrightHR. These documents will form the basis of the employee's on-going personal development and the next appraisal meeting.

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 worn attire.

OLC considers the way employees dress and their appearance to be significant 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 always 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 is 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 nonacceptable 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 cut tops or those revealing the midriff and clothing bearing inappropriate slogans. Trousers or skirts that are of a length that 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: 28/02/2026 Next Review Date: 28/02/2027

OLC (Europe) Ltd

Anti-Slavery Policy

Policy Contents

1. Introduction
2. Purpose
3. Scope and Supply Chain
4. Underlying Philosophy
5. Corporate Objectives and Training
6. Responsibilities and Reporting
7. 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
Reviewed by Principal 06/03/2026

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

Policy Contents

1. Statement of Intent/ Scope and Purpose
2. Responsibilities
3. Considerations for Policy
4. Risk Assessment
5. The Policy

6. Policy Evaluation, Reporting and Monitoring
7. Equality and Diversity Statement
8. Safeguarding Policy

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:

- Setting out this document as their clear anti-bribery policy, which is proportionate to the risks that the College is exposed to;
- 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;
- Training staff as appropriate so that they can recognise and avoid the use of bribery by themselves and others;
- 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;
- 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;
- 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 ofbusiness 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:

- Gain any commercial, contractual or regulatory advantage for the College in a way whichis unethical;
- Gain any personal advantage, pecuniary, or otherwise, for the individual or anyoneconnected with the individual.

This policy is not intended to prohibit appropriate corporate entertainment and/or hospitalityundertaken 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 CSM):

- 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 detailedin 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 shouldbe 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.

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:** 06/03/2026 **Next Review Date:**28/02/2027

OLC (Europe) Ltd
Absence Management Policy

Policy Statement

The College recognises that you may need time off work due to illness or injury from time to time. We are committed to supporting you during periods of illness and on your return to work. This policy aims to help you to maximise your attendance at work and explains how your absences from work will be managed to achieve this.

Scope

This policy and procedure applies to all employees who are absent from work due to illness or injury.

Principles

This policy is underpinned by the following principles:

- Every absence will be treated fairly, reasonably and with sensitivity
- Personal information will be handled confidentially and respectfully. Discussions relating to absence from work will be held in private
- Employees will be given early notice of concerns regarding their absences from work and given every reasonable support to maximise their attendance
- Every reasonable effort will be made to help employees with disabilities and underlying health conditions to attend work.

Absence Management Procedure

Requesting Time Off for Medical Appointments

You must try to make medical appointments outside of work time. If this is not possible, you should try to arrange appointments for the start or end of your working day so that disruption is minimised.

If you have an appointment during work time, you must ask your manager for time off, giving as much notice as possible. Your manager will make every effort to approve your request for time off, particularly if your appointment is with a Specialist or Consultant or is the result of you having been placed on a waiting list for medical treatment. Your manager may request evidence of your appointment e.g. an appointment card, text, email or a letter from the hospital. Your absence will be recorded as a Personal Health and Welfare appointment. Your time off will be paid.

If you need regular and/or ongoing time off to attend appointments in relation to a disability or underlying health condition, your manager will decide how this can be reasonably accommodated.

Reporting Your Absence and Keeping in Touch

If you are unable to come to work due to illness or injury, you must contact your manager by telephone. You must do this no later than your normal start time. Your manager will have made you aware if alternative local arrangements are in place for reporting and recording your absence e.g. by text or email or by contacting a designated person for your School/Department.

When making contact, you must confirm:

- the reason for your absence – saying you are “unwell” is not sufficient
- how long you expect to be absent, or when you expect to return, if known
- whether you have sought, or intend to seek medical advice or help

- whether there is anything your manager needs to be aware of regarding your work.

In exceptional circumstances, a family member or friend may contact your manager or designated person on your behalf. You must then contact your manager/designated person as soon as you are able.

You are encouraged to disclose any disability, work-related issue or concern that your manager is not already aware of, so they can consider appropriate support. This is particularly important if your absence is due to or aggravated by a disability or work-related issue.

If your absence lasts more than a few days, you must keep in regular contact with your manager, or designated person. The method and frequency of contact will be mutually agreed between you and your manager/designated person and will take into account the reason for your absence.

Certification Requirements

Self-Certification

You are only required to provide a self-certificate if your absence lasts between four and seven calendar days. No documentary evidence of your illness e.g. a self-certificate, fit note or hospital document, is required for absences lasting three days or less.

On your return from any absence lasting between four and seven calendar days your manager will hold a return to work discussion with you. You will be asked to complete and sign the self-certification section of the Return to Work (RTW) form before your manager uploads the completed form to CORE. This includes for any illness or injury that occurred during annual leave, where you wish to reclaim the annual leave

Medical Certification

If your absence lasts eight or more calendar days, you must submit a fit note or hospital documentation, as appropriate. You must send your manager a copy of this medical certificate as soon as you receive it, by post, in person or electronically e.g. by email. If you do not, this may delay the payment of your sick pay or lead to a period of unauthorised absence which could result in disciplinary action.

If you receive more than one fit note during your period of absence, there must be no gaps between the dates covered by the fit notes. If there are any gaps, you must obtain a fit note(s) which covers these. If you do not, sick pay may be withheld for the days not covered by a fit note. Further guidance on fit notes can be found in Appendix I

Sickness Absence and Annual Leave

If you are ill or injured while on annual leave whether abroad or in the UK, you can reclaim the annual leave (pro-rated for part-time staff) for use at another time, provided:

- it is a day of the week you would normally have been at work

- you follow the normal absence reporting procedures outlined in above.
- This includes letting your manager/designated person know on the first day of your illness/injury that you would normally have worked, were you not on leave
- you meet the certification requirements above

Your manager will then cancel your annual leave/public holiday in CORE and record this period of absence as sickness absence.

Returning to Work

You must let your manager know when you anticipate returning to work. This will allow you and your manager to plan for your return, if such a plan is necessary

Depending on the nature and duration of your absence, it may be appropriate to discuss and agree a phased return to work, i.e. returning to work on a gradual basis. This will also depend on whether a fit note has been received and whether it offers any specific advice regarding your return to work. Your manager may seek advice or guidance from a Director.

If you plan to return to work early i.e. before the expiry of your fit note, you must discuss this with your manager before you return. If your manager is concerned that you are not well enough to return or that an early return might hinder your full recovery, they must seek advice from a Director.

If it becomes clear that you will be absent for substantially longer than four weeks, you should refer to section Prolonged Absence.

Return to Work Discussions

Return to Work Check-In

Your manager is encouraged to check in with you when you return to work. This is to make sure you are well enough to be back, to provide help and support where it is required and to update you on anything you missed while you were off. This will be a 'light touch' discussion and may not necessarily be in person, i.e. it could be by telephone if, for example, you work in a different location to your manager.

You can request such a check in if there is something you particularly wish to discuss with your manager about your health and/or absence

In-depth Return to Work Discussion

Your manager will arrange a more in-depth return to work (RTW) discussion with you if any of the following apply:

- you have been absent for four or more calendar days
- there is information on your fit note which requires further discussion
- your manager wishes to discuss what support can be offered
- your attendance levels are of concern

- your manager considers that a more structured approach to helping you to maximise your attendance is required.

If an in-depth RTW discussion is required, your manager will arrange for this to take place in private as soon as possible on your return to work, normally within the first few days of your return. Your manager will inform you of the arrangements

In advance of your in-depth RTW discussion, you must complete section 1 of the RTW form and email it to your manager who will complete section 2 when you meet. If you do not have access to a computer, your manager will complete the form with you during the RTW discussion.

The aims of the in-depth RTW discussion are to:

- confirm that you are well enough to be back at work
- establish and/or clarify:
    - the reason for your absence
    - whether or not you sought medical advice, and to discuss the advice
    - whether your illness is likely to recur
    - whether any work-related issues caused or contributed to your absence(s)
    - whether there are any ongoing or underlying health issues that may affect your levels of attendance in the future
    - whether there are any actions you could take to improve your health and attendance
- ensure you have completed the RTW form and submitted all necessary fit notes
- if appropriate, make sure you are aware of the support services available to you e.g. Staff Counselling, online support tools, health & wellbeing advice
- alert you to and discuss any concerns your manager may have regarding your attendance levels, and
- update you on anything you missed at work while you were off work

Outcome of In-depth Return to Work Discussion

Following the in-depth RTW discussion, your manager must decide whether any further action is appropriate. This could be one or more of the following:

- take no further action
- schedule further discussion with you about any work-related issues that may have contributed to your absence
- schedule further discussion with you about your general health and attendance levels, to better understand whether any of the College's support services might be able to assist
- set a review period to actively monitor your health and attendance levels
- implement appropriate reasonable adjustments
- seek advice from a Director

If you have had previous in-depth RTW discussions and your attendance levels have not improved since, your manager may decide to arrange a Formal Attendance Review meeting. Note: The point at which a Formal Attendance Review is considered appropriate will vary and will take account of individual circumstances

Your manager will detail the discussion and outcome on the RTW form, provide you with a copy and record it in CORE. If you are to be invited to a Formal Attendance Review meeting this will be confirmed to you in writing.

Unsatisfactory Attendance Levels

Your manager will monitor your attendance levels in order to support your health and wellbeing and to help you to maximise your attendance. Regular monitoring will also enable your manager to raise matters of concern with you as early as possible to give you the opportunity to improve your attendance level and avoid the need for formal review

The College's absence review points are:

3 or more spells of absence in a rolling six-month period. For example if you had one period of absence lasting three weeks in a rolling six-month period, this would count as one spell of absence in the same way as a single day or part day of absence would,

or

10 or more intermittent days of absence in a rolling 12-month period. For example you were absent on two separate days in February, a five-day spell in April, one day in August and two days in December

Your manager will also consider whether action may be required before the above review points are reached if:

- a pattern of absence emerges e.g. you are regularly absent on a particular day of the week, or particular times in the month/year, or
- your absences are having an adverse impact on the work of your business area and this is not sustainable, or
- your absences are having an adverse impact on the work or wellbeing of your colleagues and this is not sustainable

If your absences are nearing the review points and/or your manager is concerned about your absence level and/or pattern, they must make you aware of this. They must also make you aware that any further absences could result in formal action being considered. They will normally do this during an in-depth RTW discussion. A note confirming you have been made aware of the possible implications of any further absences will be recorded in CORE.

Disability Related Absences

If you have a disability that is likely to impact your attendance, you are strongly encouraged to tell your manager.

Your manager will consider the impact of your absences on your work, business area and colleagues. Any adjustments to take account of your disability will be determined by your manager in line with advice from a Director.

Pregnancy Related Absence

If your absence is due to pregnancy-related illness, you must report your absence in the usual way Your absence will be recorded but will not be counted towards the College's absence review points detailed above.

Formal Attendance Review Process

If your manager considers your attendance levels to be unsatisfactory they must seek early advice from a Director before deciding to take any formal action.

The formal review process will follow the staff disciplinary process.

Prolonged Absence

If you are absent from work for substantially longer than four weeks you are likely to require additional support to be put in place to help you to return to work. Depending on the reason for your absence, and ongoing health condition, it may be that you will be unable to return to the same type of work and/or working conditions, or return to work at all

As soon as it becomes clear that you will be absent for a prolonged period, your manager will seek advice from a Director.

Your manager will seek advice on, for example:

- the short and long-term effects of your medical condition/injury on your ability to carry out your role
- the likely duration of your illness/injury
- potential appropriate work or workplace adjustments which they could consider to support your return to work
- phasing your return to normal duties and hours

Review Meeting for Prolonged Absence

Your manager will invite you to attend a meeting to discuss:

- the advice received
- your view of your health situation
- your ability to return to work, and when
- the support that could be offered, prior to, or on your return to work.

You may choose to bring a companion to this meeting, and will be given at least one week's notice of the meeting. The meeting will normally take place on College's premises unless you request otherwise, in which case your manager will arrange to meet you at a mutually agreed location.

Your manager will be sympathetic and considerate in their approach to prolonged sickness absence, and will take account of the following when determining appropriate action:

- the nature of your illness/medical condition/injury
- the likelihood of your condition improving and indicative timescales for a return to work
- previous related and likely future absences
- the possibility of redeployment to alternative work, if appropriate
- the feasibility of making reasonable adjustments to your duties, workplace and/or working hours to support your return. These adjustments may be put in place for a short or long-term period or on a permanent basis.

Outcome of Review Meeting

The review meeting will result in one of the following outcomes:

No immediate action: you must continue to keep in contact with your manager to provide regular updates regarding your condition, and your manager will continue to review your absence regularly through further prolonged absence review meetings

The following may also be appropriate:

Further medical advice or treatment required: your manager will seek further medical advice or clarification before they make any decision, or you will continue and/or complete any medical treatment before meeting with your manager again.

Reasonable adjustments: your manager will agree to make reasonable adjustments to help you to return to work. Your progress will be reviewed regularly on your return.

Date Reviewed: 28/02/2026 Next Review Date: 28/02/2027

Appendix I – Guidance on Fit Notes

Fit notes provide evidence of the advice you have been given about your fitness for work. Your GP (doctor), nurse, physiotherapist, occupational therapist or pharmacist may issue a fit note. They will normally only issue this if your health condition is such that you may not be able to attend work for seven or more calendar days.

A fit note will confirm either that:

you are not fit for work: your health professional considers you to have a health condition which will prevent you from working for a specified period of time. Your fit note will indicate if they need to assess your fitness for work at the end of this specified period. If they do not need to reassess your fitness, you can simply return to work at the end of the specified period; or

you may be fit for work taking into account the health professional's advice: your health condition does not necessarily stop you from returning to work, but you may not be able to return immediately to your normal working hours or duties.

If you receive a fit note you must send a copy of it immediately to your manager. This will ensure you receive any sick pay due and that you and your manager can discuss your health professional's advice. Your manager will upload the copy to CORE.

If your fit note says you might be fit for work, it will usually explain the functional effects of your condition and suggest what would help you return to work. Should this be the case, you and your manager will discuss whether it is practical for you to return to work. They'll also explore with you whether the suggestions to aid your return can be accommodated. If they can, they'll agree a date for you to return to work.

Your manager does not have to follow the advice given on a fit note. However, if they believe the advice or recommendations cannot or should not be implemented, they must seek further advice and guidance from a Director.

If it is not possible to agree any adjustments, your manager will treat the fit note as saying you are not fit for work. A new fit note is not required in these circumstances.

Appendix II – Phased Return to Work

A phased return can help you return to work on a gradual basis during recovery from or after a long-term illness/injury or absence due to a medical condition/disability. A phased return allows for an element of recuperation/rehabilitation where appropriate and to trial any adjustments being considered.

Although a phased return is not necessary in all cases and is not an absolute requirement, it can help you to return to work as early as possible, where you may not yet be fit for your normal working hours, or full duties.

During a gradual increase in working time and/or duties, you and your manager can gauge how the phased return is going. When determining the possible structure of your phased return, your manager will take account of the following:

- your individual circumstances
- the reason for your absence from work
- your role and the environment in which you work
- advice and/or recommendations made by your GP orspecialist, and
- whether the proposed arrangements can be accommodated within the needs of the business

Salary Payment During a Phased Return to Work

Prior to a period of phased return, you may have been in receipt of full pay (Occupational Sick Pay), half pay, SSP only or no pay. When you return to work on a phased basis you will receive your normal contractual pay.

Although you may work part weeks or part days the absent time will not be classed as sickness absence. Therefore it will not contribute to the accrual of sick leave for the purposes of calculating sick pay entitlement, or require certification from your GP.

Initiating a Phased Return

A phased return may be recommended by a health professional on a fit note, which may suggest how the phased return might operate. Additionally, you or your manager may suggest a phased return to work, even where the health professional has not recommended it, and/or suggest alteration to a phased return recommended by the GP.

Phased Return Arrangements

Typically, a phased return is arranged so that you can gradually build up to working your usual hours or fulfilling all of your usual duties over a defined period of time, not normally exceeding four weeks. An example of this could be where, if full-time, you begin by working two full days a week, and week by week you increase back up to five days by the end of the agreed phased return period.

Your manager will meet with you throughout the period of a phased return to ensure that the agreed arrangements are still helpful and to offer additional support where needed.

If you find it difficult to make the expected increase back up to your normal working hours or duties, your manager will arrange to discuss your phased return arrangements with you. If required, in very exceptional circumstances, your manager may increase the period of time over which you can work towards your normal working hours or duties. Any increase in time will be agreed in periods of two weeks, up to a total maximum period of twelve weeks altogether, with regular reviews throughout the extended period. Subsequently, you will be expected to be back to full working hours and duties at the end of the extended period.

Annual leave should not normally be substituted for any days away from work which are part of an agreed phased return to work programme. However, there may be some occasions where accrued annual leave could form part of an extended return to work arrangement where advice received from the health professional specifies a period of

time for the return, but the employee feels they would benefit from a more gradual arrangement than advised.

Agreeing to a Phased Return

We recognise that you and your manager may agree to, and successfully implement a phased return programme without the input of a Director.

If a health professional has recommended a phased return on the fit note, then your manager may contact you before your return to work to discuss how the arrangement might work. If you both agree with the arrangement proposed, then a plan can be made to action it at the appropriate time. If however, you and your manager disagree about a proposed phased return arrangement, or how it might operate, your manager should seek advice from a Director at the earliest opportunity.

Additionally, where a phased return is thought to be appropriate, or is recommended by your health professional but you and your manager are unsure of the best arrangement, a Director should be contacted for advice.

There may be some situations where a proposed phased return cannot be accommodated due to specific working arrangements, local business needs, working or shift patterns, or because of other staffing issues. In these circumstances, your manager will do their best to accommodate a phased return, but final arrangements may need to differ from the original proposal.

Monitoring Phased Returns throughout the Phased Return to Work Period

You and your manager should review how well the phased return arrangement is working on a regular basis. Your manager should discuss any difficulties a Director if they feel further support and advice is needed, or a change to the arrangement might be necessary.

If you are unable to carry out some of your duties because of the effects of your medical condition, you and your manager should discuss what further adjustments could be made to your work, or working methods, to enable you to continue.

If you have a disability, a phased return to work may be considered to be a reasonable adjustment. However, if you have not been able to return to the full range of duties and hours of work at the end of the scheduled period, it will be necessary to consider what other adjustments might be considered as reasonable. These could include using accrued annual leave to allow full pay to be maintained for an agreed period, or a move to part time working for which you will be paid for actual hours worked.

OLC (Europe) Ltd
Data Retention Policy

Overview

OLC College (the "College") must, in respect of its processing of personal data, comply with the Data Protection Act 2018, the General Data Protection Regulation 2016/679, and related legislation (together, "Data Protection Laws").

This Retention Policy should be read in conjunction with the College's Data Protection Policy, which sets out the College's overall approach to data protection matters and sets out the rationale for why a Retention Policy is required for personal data.

The College is under a legal obligation only to keep personal data for as long as the College needs it. Once the College no longer needs personal data, the College must securely delete it. The College recognises that the correct and lawful treatment of data will maintain confidence in the College and will provide for a successful working environment.

This Policy applies to all College employees, consultants, contractors and temporary personnel hired to work on behalf of the College ("College Personnel").

All College Personnel with access to personal data must comply with this Retention Policy

Please read this Retention Policy carefully. All College Personnel must comply with it at all times. If you have any queries regarding this Retention Policy, please consult your manager and/ or the Data Protection Officer. You are advised that any breach of this Retention Policy will be treated seriously and may result in disciplinary action being taken against you

About this Policy

This Retention Policy explains how the College complies with our legal obligation not to keep personal data for longer than we need it and sets out when different types of personal data will be deleted. In particular, it sets out details of the College's policies for the retention of Special Category personal data.

Definitions

College Personnel – Any College employee or contractor who has been authorised to access any of the College's Personal Data and will include employees, consultants, contractors, and temporary personnel hired to work on behalf of the College.

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

Data Protection Officer – The Data Protection Officer is Yunus Motara, and can be contacted at ymotara@olceurope.com

ICO – the Information Commissioner's Office, the UK's data protection regulator.

Personal Data – any information about an individual which identifies them or allows them to be identified in conjunction with other information that is held. Personal data is defined very broadly and covers both ordinary personal data from personal contact details and business contact details to special categories of personal data such as trade union membership, genetic data and religious beliefs. It also covers information that allows an individual to be identified indirectly for example an identification number, location data or an online identifier.

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

Data retention Periods

The College has assessed the types of personal data that the College holds and the purposes the College use it for. Appendix 1 sets out the retention periods that the College has set for the different functions within the College, and the different types of data that they each hold and process.

If any member of College Personnel considers that a particular piece of personal data needs to be kept for more or less time than the period set out in this policy, please contact the Data Protection Officer for guidance.

Appendix 1 – OLC College Document Retention Schedule

Guiding principle, personal information should only be kept as long as is necessary

Type of Data	Data protect issue	Retention Period	Reason
Governance and Management			
Board minutes	Staff confidential matters	Life of Institution	
Property deeds and mortgages	N	Permanent	
Correspondence relating to important legal matters	There may be if dealing with confidential issues relating to staff or students	Permanent	
Share Certificates	N	Permanent	
Complaints	Y	Current academic year plus 3 years	

Management meeting papers and minutes	There may be if dealing with confidential issues relating to staff or students	Current academic year plus 3 years	
Human Resources			
Personnel Files; training records; notes of grievance and disciplinary hearings	Y	6 years from the end of employment	Provision of references and limitation period for litigation
Staff Application forms; interview notes	Y	6 months from the date of the interviews	Limitation period for litigation
DBS Checks	N	DBS certificates are not kept	
Facts relating to redundancies (less than 20)	Y	3 years from the date of redundancies	Limitation period for litigation
Income Tax and NI returns; correspondence with Tax Office	Y	3 years after the end of the financial year to which the records relate	Income Tax (Employment) Regulations 1993
Statutory Maternity Pay records and calculations	Y	3 years after the end of the financial year to which the records relate	Statutory Maternity Pay (General) Regulations 1986
Statutory Sick Pay records and calculations	Y	3 years after the end of the financial year to which the records relate	Statutory Sick Pay (General) Regulations 1982
Wages and salary records	Y	6 years from the last date of employment	Taxes Management Act 1970
Performance Management and Development records	Y	6 years after the end of the financial year to which the records relate	
TLO and Learning Walk records	Y	6 years after the end of the financial year to which the records relate	
Records and reports of accidents	Y	3 years after the date of the last entry (or in the case of students under 18, 3 years after their 18th birthday)	RIDDOR 1995
Health Records	Y	During Employment	Management of Health and Safety at Work Regulations
Concerns about adults behaviour (a copy should be given to the individual)	Y	Longer of 10 years/retirement age. Note, should be removed form personnel file is found to be malicious	"Keeping children safe in education Statutory guidance for schools and colleges March 2015"; "Working together to safeguard

			children. A guide to interagency working to safeguard and promote the welfare of children March 2015”
Health, safety and insurance			
Accidents reports and claims	Y	Permanent	
Insurance records and polices	N	Permanent	
Trips	Y	Academic year of trip plus one month	
CCTV footage	Y	4 weeks	
Finance			
Financial statements	N	6 years after the end of the financial year to which the records relate	
Audit report	N	6 years after the end of the financial year to which the records relate	
Tax records	N	Permanent	
Bank records	N	6 years after the end of the financial year to which the records relate	
Accounting record	N	6 years after the end of the financial year to which the records relate	
Student support funds	Y	6 years after the end of the financial year to which the records relate	
Contracts	N	Permanent	
Expenses claims and records	Y	6 years after the end of the financial year to which the records relate	
Lease and Hire Agreements	N	Permanent	
Quotations (out)	N	3 years after the end of the financial year to which the records relate	
Student Records			
Application/admissions data	Y	Whilst applicant at college plus one year	
Enrolment data	Y		As required in funding contract
Attendance data	Y		As Above
Achievement data	Y		As Above

Learner progress data	Y	5 years after completion of learning	Awarding body requirement
Internal Quality Assurance records	Y	3 years after completion of learning	Awarding body requirement
Learner assessed work (e.g., Coursework)	Y	Keep for 12 weeks after the course end date (for assessment appeals) then return to learners	Awarding body requirement
Safeguarding records	Y		
Quality Reviews		3 years after completion of learning	

OLC (Europe) Ltd
Data Subject Rights Procedure

Overview

OLC College (the College) must process many categories of personal data to provide education, training and employment. It regards the lawful and correct 1.2 treatment of personal information as imperative to successful operations and to maintaining confidence between all data subjects and ourselves. We ensure that our organisation treats information it processes lawfully and correctly

The General Data Protection Regulations (GDPR) provides individuals with statutory Rights which can be exercised at any given time.

These rights are:

1. The Right to be Informed
2. The Right of Access
3. The Right to Rectification
4. The Right to Erasure
5. The Right to Restrict Processing
6. The Right to Data Portability
7. The Right to Object
8. Rights in Relation to Automated Decision Making and Profiling

The College must acknowledge and respond to all requests within the provisions of the regulations.

There may be occasions were an exemption, legal requirement or overarching business need applies which, in turn, restricts the extent of us meeting the data subjects wishes however all requests will be considered on a case-by-case basis.

All requests in relation to Data Subject Rights (DSR) must be processed and responded to without undue delay and in any event within one month of receipt of the request. In exceptional circumstances, the timeframe may extend by one additional month.

This procedure provides guidance on the process to be followed when a data subject makes a request in relation to his/her rights as per GDPR.

You must not destroy information as a result of an individual exercising their Rights. This is a criminal offence if it is done after a request has been made.

Exemptions to the format of the request may apply under the Disability Discrimination Act 1995

Scope

Data Subject rights can be exercised by any individual whose personal data is processed by the College.

In respect of an initial enquiry or receipt of a request this procedure applies to all College employees.

Once the request has been transferred to the Data Protection Officer (DPO), the procedures scope is limited to the DPO and data custodians.

Procedure

Receipt of request

For the purposes of demonstrating accountability, transparency and good record keeping, the College would ask for all DSR requests to be submitted in written format. If an individual makes a verbal request the College will follow up in writing asking the individual to confirm our understanding and detail of what is being asked.

Requests will not be actioned until confirmation from the requester has been received. Requests may not be clearly identified as a DSR request. The requester does not have to quote GDPR or data protection to have the request treated as such.

Staff should consider if this is a legitimate request or a routine business enquiry and contact the DPO for guidance where there is uncertainty.

Once determined as a legitimate DSR request, it should be forwarded to the DPO who will assume responsibility for overseeing the request and providing a response.

Check that the request is within the scope of GDPR

Before proceeding with the request, the DPO will verify the following:

- It provides sufficient information to verify the data subject's identity; and
- It provides sufficient information to enable the College to locate, assess and action the relevant scope of the request.

Verify the identity of the data subject

Before processing the request, the identity of the data subject must be verified. Whilst it is important that you do not communicate personal information to people who are not the data subject, you must not appear obstructive. The College should take reasonable measures to verify their identity. You should keep a record of what measures you take.

You can often verify their identity from their circumstances, e.g. address, signature. If this is not possible, you can write to the individual asking them to send you a photocopy of some form of identification such as their passport or driving licence.

It is important to note if the data subject is making the request or is the request being made on behalf of the person. If a third party is making the request, you should only respond where there is a legal basis to do so. This will normally be 'consent' of the data subject.

There may be occasions where this measure is not required e.g. staff member making a request via their college email account.

Clarify the request

If the request is unclear or is very broad, you may contact the applicant to seek clarification or a reformulation of their request. This can be done by telephoning the applicant or in writing. For the purposes of recording the rationale behind how we respond to a request, it would be preferable to do this in writing.

Where further information is required before a search can be undertaken or a clear understanding of the request, the data subject should be contacted within 5 working days of receipt.

Where clarification is required, the requester will be asked to respond within 5 working days from the date clarification is being sought.

The month deadline for response is re-calculated to begin from the date the clarification is received.

Seeking clarification must not be used as a means of allowing the College extra time to locate and review the information.

Calculate deadline for response

A response must be issued without delay and within a maximum time of 1 month from the date the request or clarification is received.

The due date for the response should be calculated. The calculation for the 'month' should be calculated as per date e.g. if a request is received on 4th March, the response should be received by the requester no later than 4th April.

Record DSR Request

- The date the request is received must be recorded to evidence the timescale for response. The clock begins from the date of receipt by the College, not the DPO therefore it is imperative that confirmed or suspected DSR requests are forwarded to the DPO as soon as possible.
- Input the request details on to the designated recording system.
- Note the deadline for reply against the record
- Acknowledge receipt of request (The acknowledgement letter should be completed no later than 5 working days from receipt of the request).

Determine the information

How each DSR request is handled will depend on the category within which it falls. When searching for where personal information about the applicant might be held, you may need to search central filing systems, personnel records and shared databases to locate the requested data. You may also need to speak to members of staff across different departments who might hold information about the individual.

The following is guidance however the DPO (or delegates) may operate discretion, flexibility and extra measures as each request will vary

1. **The Right to be Informed**

- This request may be an individual asking questions such as how we are processing their data, why are we carrying out a certain processing activity, querying our legal basis or who their data may be shared with etc.
- The College has a Privacy Notice on the website which individuals can be directed to. It will contain the broad, high volume or significant processing activities of the College.
- For activities not included on the Privacy Notice, the DPO will contact the relevant Head of Department/School to determine the background to the processing.
- There may be exemptions of a data subject's right to be informed e.g. where the processing is subject to criminal investigation. Such considerations will be reliant on thorough co-operation of all relevant staff

2. **The Right of Access**

- Identify the individual's relationship with the College e.g. staff, student, customer as this will help identify where personal information about the applicant might be held and locate that information.
- You may need to search relevant filing systems, personnel records and shared databases.
- You may also need to speak to members of staff across different departments who might hold information about the individual.
- It is imperative that the data custodians inform the DPO if there are risks associated with certain disclosures. The DPO can then determine if there is an existing exemption to protect the information.

3. **The Right to Rectification**

- The data subject has a right to ask for inaccurate information to be corrected.
- Once it is clear what information is being queried, the DPO should contact the lead custodian of that data.
- Consideration should be given by all parties involved as to the scope of the request i.e. does the information stretch beyond one department, are third party processors involved and if so, they should also be notified.
- There may be occasions where the information cannot be changed however a note may be put against the data to reflect the inaccuracy.

4. **The Right to Erasure**

- This Right may be more commonly recognised as the 'Right to be Forgotten' and may be referred to as such by the requester.
- If the data subject has reason to believe their information is being processed without a legitimate basis, they may ask for the data to be deleted or removed.
- In some circumstances the College may have an overarching business need to either partially delete the data or not at all. Such cases may include:

    - We have a legal obligation to retain the information
    - Public interest is better served by keeping it on record
    - Information is required to substantiate or refute a legal claim
- Consideration should be given by all parties involved as to the scope of the request i.e. does the information stretch beyond one department, are third party processors involved and if so, they should also be notified
- The DPO and data custodians must consider the impact of erasure and together record the rationale behind the final decision.
- Regardless of the final decision, the DPO will either confirm deletion or communicate our rationale for our need to keep the information active.

5. The Right to Restrict Processing

- This Right allows individuals to request a halt on the processing of any personal information which they consider to be inaccurate, unlawful or to defend or refute a legal claim and they do not wish for the data to be deleted.
- This list is not exhaustive, and all requests should be considered.
- The DPO and data custodians must look at the areas where the information is processed e.g. departments, systems, files
- The College will be permitted to retain the data, but further processing will not take place.
- We will also keep a record of information to ensure this Right is respected in future processing by our organisation.

6. The Right to Data Portability

- An individual who registers with another service provider may request that their information is transferred to them directly.
- The right to data portability only applies:
    - to personal data an individual has provided to a controller.
    - where the processing is based on the individual's consent or for the performance of a contract; and
    - when processing is carried out by automated means.
- The DPO should contact the data custodian, this will primarily be I.T to determine the process required to meet this request.
- Information may be electronically transferred to the third party safely and to the point of being re-used by them.
- We will provide the personal data in a structured, commonly used and machine-readable format. Machine readable means that the information is structured for software to extract specific categories of information. The new service provider should in turn, be able to re-use the information we have provided to them.
- We may be able to transmit the data directly to another organisation if this is technically feasible. This will be considered on a case-by-case basis depending on the software available to both parties

7. **The Right to Object**

- If an individual believes our public task is unfounded or they wish to have their details removed from direct marketing campaigns or research/statistical processing, this Right gives them the opportunity to object to these processing activities.
- Processing for performance of a legal task or Public Authority purpose.
    - We will grant your request unless there is a legal basis to continue the processing or if the processing is to settle a legal claim.
    - This legal purpose can be confirmed with the data custodian
- Rights in Relation to Direct Marketing
    - If an individual wishes for their details to be removed from our marketing lists, we will comply with your request immediately and no further advertising should be issued by the College to that individual.
    - These requests must be communicated to Marketing immediately and mailing lists updated with this new preference.
    - List of subscribers and mailing preference lists should be refreshed immediately prior to every advertising communication.
- Rights in relation to statistical/research purposes
    - If the College has reason to process personal information for this reason, we will consider all requests and where possible grant your request unless it is necessary for the performance of a public task.

8. **Rights in Relation to Automated Decision Making and Profiling**

- If personal information is subject to automated decision making i.e. there is no human involvement, individuals have a right to ask for a person to review the information and make a fresh decision.
- The College cannot guarantee a different outcome, but human intervention may explain rationale to the individual.
- There are some instances where this Right does not apply, such as:
    - The processing is necessary for contractual purposes
    - The processing is based on consent

Further guidance on all such Rights is available on the ICO website

Review information considering possible exemptions

Once you have identified the location of all information, you must consult with the data custodian and other relevant managers to discuss the impact of the request e.g. can we erase all data, is there a legal basis for processing which prevents erasure, what is the impact of disclosure.

If the request relates to disclosure and the College considers this a risk, you must consider any relevant exemptions in legislation.

This must be done on a case-by-case basis for each individual piece of information. In some cases, you may be able to action elements of a request, but not all.

If you are being asked to disclose information, only that which is about the person making the request should be released. You should redact personal data of any third party if a legal basis to process does not exist. Redaction should result in third parties being unidentifiable. Guidance on anonymisation is available in the FE Sector GDPR Handbook and the Information Commissioners Office (ICO) website.

Responding to the Applicant

The applicant should receive a response in permanent form without delay and within a maximum time of 1 month from the date the request or clarification is received

If the request relates to Right of Access, the requester must be provided with the following in the response:

- Confirmation if personal data is being processed
- Access to that data, where exemptions do not apply
- Purpose of processing
- Categories of data concerned
- Recipients to whom the data is shared
- Retention period of the data, where possible
- existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing the right to lodge a complaint with the ICO
- where the personal data are not collected from the data subject, any available information as to their source
- the existence of automated decision-making, including profiling.

In relation to all other Rights requests, the individuals should be provided with either a confirmation that their request has been actioned or an explanation as to why the College is unable to process their request

Appeals Process

If a requester is not happy with how the College has handled their request or exemptions applied to the response, they have a right to ask for an internal review of their request. Appeals should be submitted within 10 working days of receipt of this response detailing reasons for dissatisfaction and should be addressed to:

Yunus Motara - Director of Marketing, MIS and Infrastructure.

The DPO will issue an Appeal acknowledgement within 5 working days from receipt of appeal.

The DPO will convene a panel of independent personnel who will then examine the initial request/response, the request for appeal and review if there are areas for improvement and whether or not the College should reconsider its original response rationale

The College will issue a response to all appeals within 20 workings days from date of the acknowledgement letter being issued.

If the requester is not happy with the Appeal Panel decision, they may contact the Information Commissioners Office (ICO) with a 'request for assessment' at:

ICO
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Recording all Requests

Each request should be fully documented with the following:

- Name/contact details of the requester
- Nature of the request
- Date request received/responded to
- Copies of all correspondence between the College, the data subject and any other parties.
- A record of any telephone conversations used to verify the identity of the individual or the information required.
- A record of your decisions and how you came to make those decisions e.g. application of exemptions.
- If redactions have been made, copies of unredacted info should be retained; and
- Copies of information sent to the data subject.

Communication Plan

This procedure will be available for staff on the website. In addition to being available on the website, the above procedures will be communicated during staff induction and training

All staff to receive awareness raising and training to demonstrate an understanding of the requirements and responsibilities of the Freedom of Information legislation.

OLC (Europe) Ltd
Dependant Leave Policy and Procedure

Time Off for Dependants Leave is intended to provide an immediate, limited period of unpaid time off, for employees to deal with unexpected or emergencies involving a dependant or to make necessary arrangements for longer term care for a dependant.

It is only available in situations requiring sudden and unforeseen crisis management (e.g., if your child or another dependant falls ill, time off can be taken to deal with the immediate crisis, and to make arrangements for longer term care, but not to provide continuing care).

Entitlement

- Staff members have a statutory right to take unpaid time off to provide assistance or take appropriate action to deal with an emergency concerning a dependant.
- A dependant is a spouse, partner, parent, child or any other person who lives in the same household as the staff member, but is not a lodger or boarder, or may be any other person who relies on the staff member for care.
- Examples of when a staff member may take time off in an emergency include a dependant being taken suddenly ill or existing arrangements for the care of a dependant being unexpectedly disrupted.
- A reasonable amount of time off work can be taken under this category of leave, of an amount sufficient for the staff member to deal with the emergency (e.g. to arrange for care for the dependant - normally not more than one or two days). Time off for dependants cannot be used to provide long-term care.

Procedure

You should tell your manager, as soon as practicable, the reason for your absence and how long you expect to be away from work. Where possible, you should complete a Dependants Leave Form prior to your absence. Where you are unable to complete a Dependants Leave Form prior to taking leave, you should make every effort to contact your manager on the first day of absence or as soon as practicable thereafter and tell him or her the reason for your absence and how long you expect to be away from work.

You are required to complete a Time Off for Dependants Leave Form on your return to work.

Last review: 28/01/2026. To be reviewed: 28/02/2027

APPLICATION FOR DEPENDANT LEAVE
(Including time off for Bereavement)

Applicants should complete Section 1 and 2 and pass to their Head of School/Director for approval. .

Section 1 – Arrangements

Please indicate whether applying for a period of paid and / or unpaid leave	
Paid Leave ☐	Number of days requested ☐
Date paid leave commenced: (inclusive)	(dd/mm/yyyy)
Date of return to work:	(dd/mm/yyyy)
Unpaid Leave ☐	Number of days requested ☐
Date unpaid leave commenced: (inclusive)	(dd/mm/yyyy)
Date of return to work:	(dd/mm/yyyy)
Brief explanation for requesting leave:	

Section 2 – Applicant Details

Full name: (PRINT)	
Position:	
School/Department:	
Staff Category (eg. Academic, Student Services)	
Applicant's Signature:	
Date:	

Section 3 - Authorisation

Approval of Head of School/Director			
Application approved	☐	Application refused:	☐
Reason for refusal:			
If approved, the following arrangements were agreed: Number of days of **paid** leave granted: ..... Number of days of **unpaid** leave granted:			
Signature Box *(Head of School/Director)* Signature: ..... Print Name: ..... Position: ..... Date:			

For Official Use Only
Date received by Director of Marketing, MIS and Infrastructure
Database entry ☐

The original application will be retained on the individual's personal file.

The College is committed to promoting equality of opportunity for all staff irrespective of their sex, marital status, perceived religion, political opinion, racial group, sexual orientation, age, having a disability or having dependants.

OLC (Europe) Ltd
Expenses policy

Policy Purpose and Scope

OLC acknowledges that its employees may incur expenses in the carrying out of their role. This policy sets out the College's stance on the scope, authorisation and reimbursement of those expenses.

Expense claims must be supported by receipts to evidence expenditure. In addition, claims will only be processed where the College considers the employee's expenditure to be reasonable and necessary.

Misuse of the College's expenses policy is considered to be a disciplinary offence under the College's disciplinary procedure which may result in the employee's dismissal.

Types of Expenses

Noted below are the most common types of expenditure for which the College will reimburse the cost. The cost of other expenditure may also be reimbursed, however, employees must always seek authorisation from their line manager before purchase.

Travelling Expenses

Employees should:

- consider whether travel is necessary or whether the task could be completed by telephone or video conference
- choose the most cost-effective methods of travel
- ensure their travel is approved by their line manager.

Car Mileage

Business mileage may be claimed at the following prevailing rates:

- own car = 45p per mile

There will be no reimbursement of home to campus mileage and return, except in the case of home-based employees travelling to head office.

Rail and Air Travel

Where such travel has been approved and it is necessary to undertake travel at extremely short notice, any travel paid direct by the employee will be reimbursed through the expense claim process, for which a receipt must be provided. In normal circumstances, such travel is to be booked through the accounts department.

Parking, Road Tolls, Underground, Taxi and Bus Fares

Parking, road tolls, underground, taxi and bus fares will be reimbursed as appropriate, but usage must be appropriate and supported by receipts.

Expenses incurred when travelling from home to your usual/designated College campuses will not be reimbursed.

Accommodation and Allowances

Overnight accommodation will only be approved when significant travel has to be undertaken and will only be authorised in respect of early morning work.

In certain circumstances, the College will provide you with an overnight accommodation allowance. Where overnight accommodation is authorised and booked, this will take the form of bed and breakfast accommodation only. The reasonable cost of an evening meal will be reimbursed which must be supported by a relevant receipt.

Client/Staff Entertainment

Where employees have been authorised to entertain clients, the College will reimburse costs on production of receipts via the expenses procedure. It is normal practice for the most senior employee present at the event to produce an expenses claim in relation to client entertainment, however, if this is not possible, the claim can be made by another employee. The claim must be authorised by the most senior employee present. Where all employees are of the same seniority, only one employee should incur costs and present a claim.

Expense Claim Procedure

Claim forms are available from CORE11 Employees should send the completed form to their line manager for authorisation. The claim will then be passed to the accounts department for processing.

The claim form should be submitted within 4 weeks of the expense being incurred; with the appropriate supporting receipts, vouchers, mileage record or other proof that they have been incurred; and otherwise complies with the above rules for reimbursement.

Records of personal travel and entertaining claims should be kept for two years following the end of the relevant income tax year.

Manager Responsibilities

When authorising travel plans, managers should ensure that the plans are the most cost-effective method to be used, and that all travel and entertainment cost is pre-authorised. Claim forms should not be signed off without thorough inspection that all costs are reasonable and supported by valid evidence.

Last review: 28/02/2026. To be reviewed: 28/02/2027

OLC (Europe) Ltd
Flexible Working Policy

Policy Contents

1. Introduction
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8. Consultation Meetings about Flexible Working
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11. Requesting a Reasonable Adjustment
12. Trailing New Working Arrangements
13. Varying an Employee's Contract
14. Complaints and Further Information

1. Introduction

OLC encourages staff to consider flexible working arrangements. The College recognises that a better work-life balance can improve employee motivation, performance, and productivity, and reduce stress. Therefore, the College wants to support its employees to achieve a better balance between work and their other priorities, such as caring responsibilities, leisure activities, further learning, and other interests.

The College is committed to agreeing any flexible working arrangements, provided that the needs and objectives of both the College and the employee can be met.

It is the College's policy to encourage open discussion with employees. If an employee thinks they may benefit from flexible working, they can either:

- contact your line manager to arrange an informal discussion to talk about the options
- submit a flexible working request, by following the steps in this policy

This policy does not form part of the employment contract and can be amended at any time.

2. What Flexible Working is

Flexible working is any type of working arrangement that gives some degree of flexibility on how long, where and when an employee works.

For example:

- annualised hours
- compressed hours
- flexitime
- hybrid working
- job sharing
- part-time working
- remote working
- staggered hours
- term-time working
- working from home

These examples are considered to be the typical arrangements that employees will request. However, the College recognises that there may be alternatives or a combination of options which are suitable to both the College and the employee.

3. Types of Flexible Working

Annualised hours

Annualised hours means an employee's contractual working hours are calculated as the total number of hours to be worked over the year. The employee has some flexibility on when they work these hours over the year.

Usually, the hours will be divided into set rostered hours during busy periods, and unallocated hours during quieter periods. An employee can decide when to work their unallocated hours, subject to some limitations.

Payment will be in 12 equal instalments. However, arrangements may be permitted where the pay for the work actually done is in the period the payment relates to.

Compressed hours

Compressed hours means an employee works their usual full-time hours in fewer days by working longer blocks. There is no reduction in the employee's pay. For example, a 5-day week is compressed into 4 days, or a 10-day fortnight into 9 days.

Flexitime

Flexitime allows an employee to choose when to begin and end work, within certain limits.

An employee is required to work during core hours and must work an agreed number of hours during the accounting period of a month Their hours of attendance will be recorded and added up at the end of each accounting period.

An employee can carry over an excess of up to 5 hours or a deficit of up to 5 hours from one accounting period to another. A deficit of hours should be made up in the following accounting period. An employee can use excess hours to either reduce attendance outside of core hours or take additional leave (flexi leave). Flexi leave is subject to a maximum of 2 full days in any accounting period. An employee should request and agree flexi leave with their line manager, in the same way as holiday entitlement (annual leave).

Hybrid working

Hybrid working is a mixture of working remotely and in the employer's premises. Working remotely can include working from home or other agreed locations.

Job sharing

Job sharing is an arrangement where a full-time post is divided into 2 part-time roles. The 2 job holders then share the overall duties and responsibilities. Their skills and the hours each employee wishes to work must be compatible and meet the needs of the College.

Pay and benefits are shared in proportion to the hours each person works. Job sharing can be considered where the creation of a single part-time post is difficult, or where 2 individuals wish to work part-time.

Part-time working

Part-time working covers any arrangement where an employee is contracted to work anything less than typical full-time hours for the type of work in question. For example, an employee who works Monday to Wednesday.

All posts are available on a part-time basis, except where this is not practical.

Remote working

Remote working means working from anywhere other than the employer's premises. This can include working from home or any other agreed location.

The College can consider remote working as being an occasional agreed day, a mix of working remotely and in the workplace, or a full-time arrangement.

Staggered hours

Staggered hours means having a different start and finish time to other employees. For example, working from 8am to 4pm instead of 9am to 5pm.

Term-time working

Term-time working is where an employee's contractual working hours are during school terms only.

An employee does not work during school holidays. Any weeks above their annual leave entitlement are unpaid. Salary can be paid in 12 equal monthly instalments. Alternatively, an employee can ask to be paid for the time worked only and receive no pay during the holidays apart from their holiday entitlement (annual leave).

Working from home

Working from home or homeworking is when an employee regularly carries out all, or part of, their duties from home rather than the employer's premises. The College can consider homeworking being an occasional agreed day, a mix of working at home and in the workplace, or a full-time arrangement.

4. Our Approach to Flexible Working

The College is committed to providing a range of appropriate working patterns.

There are many different types of flexible working. While some might not be practical for every job, it is likely other types will work. The College commits to look at what is possible.

Where a flexible working arrangement is requested, the College will consider a number of criteria. This includes:

- the costs associated with the proposed arrangement
- the effect of the proposed arrangement on other staff
- the need for, and effect on, supervision
- the existing structure of the department
- the availability of staff resources
- details of the tasks specific to the role

- the workload of the role
- whether it is a request for a reasonable adjustment related to a disability
- health and safety issues

The College is committed to agreeing any flexible working arrangements, provided that the needs and objectives of both the College and the employee can be met.

5. Eligibility

All employees have a statutory right to request flexible working from the first day of employment.

6. Submitting a Flexible Working Request

An employee is entitled to submit 2 statutory flexible working requests in a 12-month period.

An employee can only have one live request at a time. A request will stay live until any of the following happen:

- the College makes a decision
- the employee withdraws the request
- the employee and College agree an outcome
- it has been 2 months since the date of the request

All requests must be made by email to their line manager.

Any request must include:

- the date of the request
- the changes that the employee is seeking
- the date the employee would like the proposed change to start
- whether this is a statutory or non-statutory request
- whether the employee has made any previous flexible working requests to the College
- the dates of any previous requests

If the request relates to a reasonable adjustment for a disability under the Equality Act 2010, the employee should make this clear in the request.

If a request does not contain all of the required information, the line manager will advise the employee what else they need to provide and ask the employee to resubmit the request.

7. Responding to a Flexible Working Request

The line manager will consider the proposed flexible working arrangements. They will look at the potential benefits and adverse effects to the employee and to the College in implementing the proposed changes.

Each request will be considered on a case-by-case basis, in the order they are received. Agreeing to one request will not set a precedent or create the right for another employee to be granted a similar change to their working pattern.

Where an employee's request needs further discussion, the College will invite the employee to a consultation meeting. If a meeting is arranged it will be held within 10 working days of the College receiving the request. This time limit may be extended with the agreement of both the employee and the line manager.

Where an employee's request can be approved in full without a consultation meeting, the College will confirm this in writing within 10 working days of receiving the request. This will include details of the new arrangements and an invitation to talk about the new arrangements. This time limit may be extended with the agreement of both the employee and the line manager.

The College will make a decision on all requests, including any appeal within a maximum of 2 months. This time limit may be extended with the agreement of both the employee and the line manager.

8. Consultation Meetings About Flexible Working

If the employee is invited to a consultation meeting, the line manager will discuss:

- the request
- how the proposed working arrangements might work
- how it could be of benefit to both the employee and College

The employee will be given advance notice of the time, date, and place of the meeting. If the initial date is problematic, then one further date will be proposed. This meeting will be in person or a video call, or a telephone call if neither of those are possible.

At the meeting, the employee may if they wish, be accompanied by a colleague.

If the employee fails to attend a meeting and then fails to attend a rearranged meeting without good reason, their request will be deemed to have been withdrawn.

9. Communicating a Decision After Consultation

After a consultation meeting, the request may be granted in full, in part or refused.

The College may:

- propose an alternative option
- grant the request on a temporary basis
- ask the employee to try the flexible working arrangement for a trial period

If a working arrangement is agreed, the employee will be sent a confirmation letter within 10 working days of the consultation meeting. This will include details of the new arrangements and an invitation to talk about the new arrangements.

If the College refuses the request, the employee will be given the decision in writing within 10 working days of the consultation meeting.

10. Right to Appeal a Decision

An employee has the right to appeal the decision if their request is refused or is only agreed in part.

The employee may submit an appeal within 5 working days of being notified of a decision on their request. This should be done in writing and clearly state the reasons for their appeal.

The appeal will be heard within 5 working days. The employee will then be informed of the outcome of their appeal within 5 working days of an appeal meeting. These time limits may be extended with the agreement of both the employee and the line manager.

At the appeal meeting the employee may, if they wish, be accompanied by a workplace colleague.

11. Requesting a Reasonable Adjustment

The College is committed to reducing and removing disadvantages for disabled employees.

If an employee needs to change where, how, or when they work because of their disability, they can request a reasonable adjustment under the Equality Act 2010. If an employee requests a reasonable adjustment, they do not need to also make a flexible working request.

To request a reasonable adjustment, send your request by email or letter to your line manager and include:

- that you are making a request for a reasonable adjustment under the Equality Act 2010
- the adjustment you are requesting

The line manager will discuss your request with you within 10 working days of the College receiving the request. The outcome will be confirmed in writing within 10 working days of the discussion, including any agreed reasonable adjustments. These

time limits may be extended with the agreement of both the employee and the line manager.

12. Trialling New Working Arrangements

Where there is some uncertainty about whether the flexible working arrangement is practical for an employee or the College, a trial period may be agreed.

A trial period will allow enough time to implement and get used to the new arrangement before making any decisions on its viability.

The College will put any trial arrangements in writing to the employee. This will include their new working pattern and make clear that it is only a temporary change to the employee's terms and conditions.

The employee will be informed in writing of the start and end dates of the trial period. The College may reduce or lengthen the trial period where necessary, with the agreement of the employee.

The College will reserve the right, at the end of the agreed trial period, to require the employee to revert to their previous working arrangement. In this situation, the College will give the employee 4 weeks' notice.

13. Varying an Employee's Contract

Where flexible working practices are agreed as a permanent change, any variation to the employee's terms and conditions will be put in writing. Written confirmation of the changes will be sent to the employee within one month of the change being agreed.

If the employee has any questions or concerns, they should contact the line manager.

14. Complaints and Further Information

An employee should raise any concerns with their line manager if they:

- are not satisfied with any stage of the flexible working request process
- feel they have been treated unfairly because they have made a flexible working request

If informal discussions do not resolve the matter to an employee's satisfaction, they should raise a grievance under the College's grievance procedure.

For further information, an employee should contact their line manager.

Last review: 28/02/2026. To be reviewed: 28/02/2027

OLC (Europe) Ltd
Lone Working Policy

Policy Statement

OLC takes the health and safety of its employees and volunteers seriously. We have a legal duty to ensure the health, safety and welfare of our employees and volunteers while at work or conducting volunteer activity. We realise that at any given time, staff or volunteers may be working or volunteering along, either in one of our campuses or externally.

Aim and Scope

This policy is designed to alert employees and volunteers to the risks presented by lone working, to identify the responsibilities each person has in this situation, and to describe procedures which will minimise such risks. It is designed to give employees and volunteers a framework for managing potentially risky situations.

Related Legislation

- Health and Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999

Context

OLC has a legal duty to ensure the health, safety and welfare of employees and volunteers while at work or engaged in volunteer activity. At any given time, employees or volunteers may be alone, either in our premises or when operating on our behalf externally. We are responsible for assessing the risks to lone workers and taking steps to avoid or control the risks where necessary. Employees and volunteers have responsibility to take reasonable care of themselves and others in lone working situations. Lone working is not inherently unsafe. Taking precaution can reduce the risks associated with working alone. This policy is designed for employees and volunteers who either frequently or occasionally work or volunteer alone. It also refers to both high and low risk activities.

Definition

The Health and Safety Executive defines lone workers as those who work by themselves without close or direct supervision. For example:

- People working separately from others in a building
- People who work outside 'normal' hours
- People who work away from their fixed base without colleagues
- People who work at home other than in low risk, office-type work

The definition covers staff and volunteers in situations with varying degrees and types of risk. It is important to identify the hazards of the work and assess the risks involved before applying appropriate measures.

Potential Hazards of Working Alone

People who work or volunteer alone will of course face the same risks in their work as others doing similar tasks.

However, additionally they may encounter the following:

- Accidents or sudden illnesses may occur when there is no-one to call for help or first aid available
- Fire
- Violence or the threat of violence
- Lack of safe way in or out of a building for example, danger of being accidentally locked in
- Attempting tasks which cannot safely be done by one person alone

Measures to Reduce the Risk of Lone Working

To reduce the risk for people working alone we conduct a risk assessment of the following issues, as appropriate to the circumstances:

- The environment – location, security, access.
- The context – nature of the task, any special circumstances.
- The individuals concerned – indicators of potential or actual risk.
- History – any previous incidents in similar situations.
- Any other special circumstances.

All available information should be considered, and risk assessments should be updated, as necessary. Where there is any reasonable doubt about the safety of a lone worker in each situation, consideration should be given to sending a second worker or making other arrangements to complete the task.

In any situation where an employee or volunteer is operating alone and feels unsafe, they must remove themselves from that situation immediately and report the incident to their line manager or supervisor.

In any situation where an employee or volunteer is operating alone and an incident occurs, this must be reported to their line manager as soon as possible. An incident is any situation where the health and safety of the employee or volunteer is compromised and may include and accident, fire, violence, or threat of violence (this is not exhaustive).

Supervision

Lone workers are by definition not under constant supervision. We ensure that you understand the risks associated with your work and the relevant safety precautions.

Employees or volunteers will be given training that covers lone working where appropriate during induction.

Employees or volunteers new to a role where they may be lone working may need to be accompanied initially.

Regular contact by phone may be appropriate and we ensure that employees or volunteers performing duties alone always have a mobile phone available to enable them to contact the office in the event of an emergency.

Accidents and Emergencies

Employees and volunteers operating alone should be made aware of the process for responding correctly to emergencies.

Employees or volunteers who are alone in the office must inform their line manager and are responsible for adhering to security and fire regulations.

Conclusion

Establishing safe working for lone workers is no different from organising the safety of other staff or volunteers, but the risk assessment must take account of any extra risk factors.

OLC ensures that measures are in place to reduce risk and that expectations have been communicated to employees and volunteers operating alone and appropriate training provided.

All staff and volunteers, including lone workers, are responsible for following safe systems of work and should take simple steps to reduce the risks associated with performing their normal duties

Last review: 20/01/2025. To 06/03/2026 be reviewed: 28/02/2027

OLC (Europe) Ltd
Menopause Policy

Introduction

The College is committed to providing an inclusive and supportive working environment for everyone who works here.

Menopause is a natural part of every woman's life, and it isn't always an easy transition. With the right support, it can be much better. Whilst every woman does not suffer with symptoms, supporting those who do will improve their experience at work.

Menopause should not be taboo or 'hidden'. We want everyone to understand what menopause is, and to be able to talk about it openly, without embarrassment. This is not just an issue for women, men should be aware too.

The changing age of the UK's workforce means that between 75% and 80% of menopausal women are in work. Research shows that most women are unwilling to discuss menopause-related health problems with their line manager, nor ask for the support or adjustments that they may need.

This policy sets out the guidelines for members of staff and managers on providing the right support to manage menopausal symptoms at work. It is not contractual and does not form part of the terms and conditions of employment.

Aims

The aims of this policy are to:

- Foster an environment in which colleagues can openly and comfortably instigate conversations or engage in discussions about menopause.
- Ensure everyone understands what menopause is, can confidently have good conversations, and are clear on the College's policy and practices, supported by management.
- Educate and inform managers about the potential symptoms of menopause, and how they can support women at work.

- Ensure that women suffering with menopause symptoms feel confident to discuss it and ask for support and any reasonable adjustments so they can continue to be successful in their roles or studies.
- Reduce absenteeism due to menopausal symptoms.
- Assure women that we are a responsible employer, committed to supporting their needs during menopause.

Scope

This policy applies to all College staff and managers.

Definitions

Menopause is defined as a biological stage in a woman's life that occurs when she stops menstruating and reaches the end of her natural reproductive life. Usually, it is defined as having occurred when a woman has not had a period for twelve consecutive months (for women reaching menopause naturally). The average age for a woman to reach menopause is 51, however, it can be earlier or later than this due to surgery, illness, or other reasons.

Perimenopause is the time leading up to menopause when a woman may experience changes, such as irregular periods or other menopausal symptoms. This can be years before menopause.

Postmenopause is the time after menopause has occurred, starting when a woman has not had a period for twelve consecutive months.

Symptoms of Menopause

It is important to note that not every woman will notice every symptom, or even need help or support. However, 75% of women do experience some symptoms, and 25% could be classed as severe.

Symptoms can manifest both physically and psychologically including, but not exclusively, hot flushes, poor concentration, headaches, panic attacks, heavy/light periods, anxiety, and loss of confidence. Some women also have trouble sleeping.

Drivers

The College has used guidance from the National Institute for Health and Care Excellence (NICE) guidelines, to inform this policy. The NICE guidelines set out the recommendations for medical professionals when treating menopausal women, and for patients as to the treatment and guidance they should be offered.

Roles and Responsibilities

Members of staff:

All staff are responsible for:

- Taking a personal responsibility to look after their health.
- Being open and honest in conversations with managers.
- If a member of staff is unable to speak to their line manager, or if their line manager is not supporting them, they can speak to another manager or Director
- Contributing to a respectful and productive working environment.
- Being willing to help and support their colleagues.
- Understanding any necessary adjustments their colleagues are receiving because of their menopausal symptoms

Line Managers

All line managers should:

- Familiarise themselves with the Menopause Policy and Guidance.
- Be ready and willing to have open discussions about menopause, appreciating the personal nature of the conversation, and treating the discussion sensitively and professionally.
- Record adjustments agreed, and actions to be implemented.
- Ensure ongoing dialogue and review dates.
- Ensure that all agreed adjustments are adhered to.

Employee Assistance (Health Assured)

The Employee Assistance service will:

- Provide access to 24/7 telephone counselling and face-to-face counselling for all members of staff

External Links

All colleagues can access counselling by contacting the College Employee Assistance helpline on 0800 028 0199

National Institute for Health and Care Excellence (NICE) guidelines. These explain how your GP will determine what types of treatments and interventions they can offer you. You can find out more information by using the following link https://www.nice.org.uk/guidance/ng23/ifp/chapter/About-this-information.

The National Health Service provides an overview of menopause. You can find more at http://www.nhs.uk/Conditions/Menopause/Pages/Introduction.aspx

Menopause information. The Royal College of Obstetricians and Gynaecologists offer further information in a dedicated area of their website at: https://www.rcog.org.uk/en/patients/menopause/

Henpicked. This site provides information on managing menopause, and an insight into women's stories (see https://henpicked.net/menopause/)

Last review: 28/02/2026. To be reviewed: 28/02/2027

Managers' Guidance for colleague discussions

We recognise that every woman is different, and it is, therefore, not feasible to set out a structured set of specific guidelines.

If an employee wishes to speak about their symptoms, or just to talk about how they are feeling (they may not recognise themselves that they are symptomatic), or if a male employee wishes to speak about a family member, please ensure that you:

- Allow adequate time to have the conversation.
- Find an appropriate room to preserve confidentiality.
- Encourage them to speak openly and honestly.
- Suggest ways in which they can be supported (see symptoms below)
- Agree actions, and how to implement them
- Ensure that this record is treated as confidential and is stored securely.
- Agree if other members of the team should be informed, and by whom.
- Ensure that designated time is allowed for a follow up meeting. Do not rely on quick queries during chance encounters in the corridor or break room.

Symptoms Support

Symptoms can manifest both physically and psychologically, including, but not exhaustively or exclusively; support for women should be considered as detailed below:

Hot Flushes

- Request temperature control for their work area, such as a fan on their desk (where possible a USB connected desk fan to ensure environmentally friendly) or moving near a window, or away from a heat source.
- Easy access to drinking water.
- Have access to a rest room for breaks if their work involves long periods of standing or sitting, or a quiet area if they need to manage a severe hot flush

Heavy/light Periods

- Have permanent access to washroom facilities.
- Ensure sanitary products are available in washrooms order to obtain personal protection.
- Ensure storage space is available for a change of clothing.

Headaches

- Have ease of access to fresh drinking water.
- Offer a quiet space to work.
- Offer noise-reducing headphones to wear in open offices.
- Have time out to take medication if needed.

Low Mood

- Agree time out from others, when required, without needing to ask for permission.
- Identify a 'buddy' for the colleague to talk to – outside of the work area.
- Identify a 'time out space' to be able to go to 'clear their head'.
- Contact Health Assured, the College's Employee Assistance Programme provider on 0800 028 0199

Loss of Confidence

- Ensure there are regular Personal Development Discussions.
- Have regular protected time with their manager to discuss any issues.
- Have agreed protected time to catch up with work

Poor Concentration

- Discuss if there are times of the day when concentration is better or worse and adjust working pattern/practice accordingly.
- Review task allocation and workload.
- Provide books for lists, action boards, or other memory-assisting equipment.
- Offer quiet space to work.
- Offer noise-reducing headphones to wear in open offices.
- Reduce interruptions.
- Have agreements in place in an open office that an individual is having 'protected time', so that they are not disturbed.
- Have agreed protected time to catch up with work

Anxiety

- Promote counselling services provided by Health Assured, the College's Employee Assistance provider on 0800 028 0199
- Identify a 'buddy' for the colleague to talk to – outside of work their area.
- Be able to have time away from their work to undertake relaxation techniques.
- Undertake mindfulness activities such as breathing exercises or going for a walk.

Panic Attacks

- Agree time out from others, when required, without needing to ask for permission.
- Identify a 'buddy' outside of work area.

- Be able to have time away from their work to undertake relaxation techniques.
- Undertake mindfulness activities such as breathing exercises or going for a walk.

Discuss whether the member of staff has visited their GP. Depending on the discussion, this may be the next step suggested, particularly if the areas of difficulty are sleeping, panic attacks or anxiety.

OLC (Europe) Ltd
Professional Conduct

This code of conduct aims to set and maintain standards of conduct that we expect all OLC's working community to follow enabling an environment where everyone is safe, happy and treated with respect.

Aims and Scope

This Code of Conduct is designed to give clear guidance on the standards of behaviour all College staff are expected to observe and applies to all staff members, voluntary workers, or those on a placement basis.

OLC employees are in a unique position of influence and must adhere to behaviour that models the highest possible standards for all our beneficiaries. As a member of the OLC community, each employee has an individual responsibility to act with personal and professional integrity and to maintain their reputation and the reputation of the College, whether inside or outside working hours.

Please note that this code of conduct is not exhaustive. If situations arise that are not covered by this code, staff will use their professional judgement and act in the best interests of the College and its beneficiaries.

Professional Conduct between Staff and Students

Inappropriate behaviour between staff and students can adversely affect the professional relationship that should exist in a working or teaching environment.

Scope

The purpose of this policy is to ensure that staff and students benefit from fair and professional interactions at all times and to protect staff from unfair allegations of misconduct or inappropriate behaviour by students.

Key Principles

Personal Relationships

Staff are strongly discouraged from forming personal relationships with students, particularly when the staff member has direct responsibility for the learning experience of the student, delivers any part of the student's learning programme, or is involved in supporting the student through their programme of study. Should such a relationship develop, the staff member should inform his or her line manager immediately. Where possible the staff member should be re-timetabled or replaced in the capacity of supporting the student, in order to remove all professional contact with the student. The staff member must not be responsible for the assessment, guidance, or support of a student with whom he/she has a personal relationship. This includes Assessors, IV's, and Invigilators. The line manager should keep a written record of the action taken.

Pre-Existing Personal Relationships

Where there is a pre-existing relationship between a staff member and a student with whom he/she comes into direct contact, the line manager should be informed that the relationship exists as soon as the staff member becomes aware that the student intends to join the College. Arrangements should be made to remove all professional contact between the staff member and the student. The staff member must not be responsible for the assessment, guidance, or support of a student with whom he/she has a pre-existing personal relationship. This includes Assessors, IV's, and Invigilators. The line manager should keep a written record of the personal relationship and of the action taken on the form at Appendix one. The form must be signed by the line manager and sent to the Director of Marketing, MIS, and Infrastructure to be held centrally. The form will be held on the personal file of the staff member and will be destroyed once the student has left the College.

Examples of 'personal relationships' would include: spouse or partner, parent, child, other family relationships, friendships where parties socialise together out with the College and relationships of an intimate nature.

Physical Contact between Staff and Students

Staff should avoid physical contact with students. In one-to-one situations involving a staff member and a student, if either the student or staff member feels it necessary, they should ask for another responsible person to be present.

If a staff member has any doubt about a particular situation this should be referred in the first instance to their line manager or alternatively to the Safeguarding Officer.

In some circumstances, for example, in a personal care situation or in the demonstration of activities associated with learning, appropriate physical contact may be necessary. Staff carrying out this role will have received appropriate training in order to carry out this role.

Diversity

Some religions expressly forbid physical contact between the sexes. In such cases the student's wishes must be respected at all times and any resulting difficulties reported to the line manager.

References

References for students must always be fair, relevant, factual, and accurate. If a staff member has either a personal difficulty or a personal relationship with a student, they should pass the reference request immediately to the line manager.

Socialising with Students

Staff should be aware that their professional relationship with current students is still deemed to exist out with the College and any report by a student of misconduct would require to be investigated. Staff are therefore advised to avoid one to one contact with students in social situations, including electronic media, out with the College.

Staff should familiarise themselves with the Email, Internet, It, social media and It Security Policy and due regard should be had towards this policy and associated procedures and guidelines.

In addition, staff must not retain students contact details on their personal mobile phones or other personal electronic devices. Where a pre-existing relationship exists between the two parties, which requires this information to be held in this manner, (e.g. neighbours etc) staff members should inform their line manager in accordance with this policy (see above).

It is also advisable when using a personal mobile phone to bar your number from being visible when calling a student.

Failure to follow the guidelines

Staff who fail to follow the guidance contained within this policy should be aware that, by their actions, they may place themselves in a position where they may be subject to allegations of misconduct and disciplinary action could result.

Honesty and Integrity

Staff should maintain high standards of honesty and integrity in keeping with their role. This includes when dealing with students, handling money, claiming expenses, and using college property and facilities.

Conduct outside of Work

Staff will not act in a way that would bring the College's reputation into disrepute. This covers conduct including but not limited to criminal offences or antisocial behaviour, as well as negative comments about the college on social media or in the local or wider community.

Criminal Offences

You must inform your manager if you are under investigation for a criminal act (including road traffic offences) or have been arrested in connection with a criminal action.
You must also inform your manager if you have been found guilty and convicted of any offence or received a police caution. Failure to disclose this information may be treated as a disciplinary offence.

If you commit a criminal offence outside employment, we will investigate to see whether there is any connection between the offence and your employment. If there is, this could result in your dismissal under the disciplinary procedure.

Bribery and Corruption

In accordance with the provisions of the Bribery Act 2010, we do not permit the bribery of any person involved in our business.

You must not authorise, offer, promise, or pay or receive a bribe designed to secure an unlawful advantage. The amount of the bribe is irrelevant.

In some circumstances, excessive hospitality or gifts may be regarded as offering or receiving bribe. Gifts that are worth more than £50 must be declared to the Director of Marketing, MIS, and Infrastructure to be recorded on the gifts and hospitality register.

Conflict of Interests

It is important that, where decisions are made which have a significant effect on the Organisation and others, they are taken in a fair and balanced way.

All staff must declare any potential conflicts of interest so that they are not involved in decisions that could be regarded as biased.

Employee Expectations

Identification Cards

Staff are required to wear college identity cards and use the college lanyard provided when on college premises for access and security reasons.

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 Nonacceptable 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 cut tops 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

Punctuality and Attendance

Staff should arrive and sign in and be ready to begin work at or before the beginning of their contracted hours.

All staff should maintain good levels of attendance and avoid absence from work where possible.

Staff should be aware of the Sickness Absence Policy and Leave of Absence Policy which provide further information on all forms of leave including compassionate leave and public service/duty leave.

Use of Language

All staff are expected to communicate with others in a professional and appropriate manner, both within and outside the College and by whatever medium, (i.e. refraining from the use of language, tone or a behaviour that could be interpreted as rude, offensive, abusive, or discriminatory)

Confidentiality

In the course of their role, members of staff are often privy to sensitive and confidential information about the college, staff, students, and their families.

All sensitive and confidential information should be handled with highest level of integrity and should never be:

- Disclosed to anyone unless required by law or with consent from the relevant party or parties
- Used to humiliate, embarrass, or blackmail others
- Used for a purpose other than what it was collected and intended for

This does not overrule staff's duty to report safeguarding concerns to the appropriate channel where staff believe a student has been harmed or is at risk of harm, as detailed further in our safeguarding policy.

Disciplinary Action

Any breach or failure to meet these standards of behaviour and conduct may be considered a disciplinary matter, which could result in disciplinary up to and including dismissal.

Last review: 06/03/2026. To be reviewed: 28/02/2027

OLC(Europe) Ltd
Whistleblowing Policy

Introduction

Whilst there is no legal definition of 'whistleblowing' either within EU or UK law, the term has been established by the Nolan Committee to mean the confidential raising of problems within an organisation or within an independent review structure associated with that organisation. It is not defined in the sense of leaking information to the media

Staff may be the first to realise that there may be something seriously wrong within the College. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the College. They may also fear harassment or victimisation. In these circumstances, it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

The College is committed to the highest possible standards of openness, probity, and accountability. In line with that commitment, the Board encourages staff and others with serious concerns about any aspect of the College's work to come forward and voice those concerns. It is recognised that certain cases will have to proceed on a confidential basis. This Policy makes it clear that staff can do so without fear of reprisals. It is also intended to encourage and enable staff to raise serious concerns within the College rather than overlooking a problem or blowing the whistle outside.

The Policy applies to all groups of staff. In law, the Public Interest Disclosure Act 1998 (PIDA) provides protection to 'workers' who disclose information, in the correct manner, from dismissal or penalisation by their employers. 'Workers' has a broader definition than 'employee' and applies to individuals who:

- Are employed under a contract of employment
- Are employed under any other contract under which they perform personally, any work or services for another party.

- Work or worked for a person in circumstances which:
- he/she is or was introduced or supplied to do that work by a third person, i.e. agency workers.
- is or was provided with work experience provided pursuant to a training course or programme or with training for employment otherwise than:
- under a contract of employment; or
- By an educational establishment on a course run by that establishment, i.e. students.

In keeping with the spirit and letter of the law, this Policy is, therefore, intended to encompass anyone who has any kind of employment relationship with the College.

It is understood that students may also have information which should be raised in the public interest. The procedures applying to students are described in the Students Complaints Procedures and this policy will not generally apply to students.

Aims and scope of this Policy

This Policy aims to:

- Provide a channel and process within which individual staff can raise genuine and legitimate concerns.
- Deter serious malpractice.
- Avoid crisis management.
- Promote accountability throughout the College.

This Policy will:

- Make it clear that malpractice is taken very seriously by the College.
- Provide details of the process by which staff may raise concerns outside the line management structure of the College, if appropriate and receive feedback on any action taken.
- Respect the need for confidentiality.
- Allow staff to take the matter further if they are dissatisfied with the College's response.
- Reassure staff that they will be protected from reprisals or victimisation for whistleblowing in good faith.

There are existing procedures in place to enable staff to lodge a grievance relating to their own employment. This policy is intended to cover concerns which fall outside the scope of other procedures, policies, and codes of conduct. The concerns which may commonly give rise to whistleblowing may be something which:

- is unlawful; or
- is against the College's policies, or falls below established standards or practice, or
- amounts to improper conduct

Types of concern considered under Whistle Blowing:

- Conduct which is an offence or breach of law
- Failure to comply with a legal obligation
- Health and Safety risks, including risks to the public, students, staff
- Unauthorised use of public funds
- Acts of Bribery and unethical incentives
- Possible fraud and corruption
- Sexual, physical, or verbal harassment of people
- Actions which are unprofessional, inappropriate or conflict with a general understanding of what is right or wrong

The above examples are not a complete list of all possible types of concerns that could come fall under a Whistle Blowing report but do offer Staff some guidance of potential subject areas.

Safeguards

Harassment or Victimisation

The College recognises that the decision to report a concern can be a difficult one to make, not least because of the fear of reprisal from those responsible for malpractice. The College will not tolerate harassment or victimisation and will take action to protect staff when they raise a concern in good faith.

If a member of staff who is already the subject of disciplinary or redundancy procedures raises a concern, those procedures will not be halted because of whistleblowing unless the concern relates directly to some malpractice in relation to the procedure in question. In this case, the procedure for disciplinary or redundancy may be put on hold pending the outcome of the investigations into the concern.

Confidentiality

The College will do its best to protect an individual's identity when they raise a concern and do not want their name to be disclosed. It must be appreciated that the investigation process may reveal the source of the information and a statement by an individual may be required as part of the evidence.

Anonymous Allegations

This policy encourages staff to put their name to an allegation. Concerns expressed anonymously are much less powerful, but they will be considered at the discretion of the College

In exercising this discretion, the factors to be considered would include:

- the seriousness of the issues raised.
- the credibility of the concern, and
- The likelihood of confirming the allegation from attributable sources

Untrue Allegations

If an individual makes an allegation in good faith, but it is not confirmed by the investigation, no action will be taken against them. If, however, an individual makes malicious or vexatious allegations, disciplinary action may be taken against them

- The PIDA protects disclosure if the worker can show one or the following:
- That a criminal offence has been committed, is being committed, or is likely to be committed.
- That a person has failed, is failing or is likely to fail to comply with any legal obligation to which he/she is subject.
- That a miscarriage of justice has occurred, is occurring or is likely to occur.
- That the health and safety of any individual has been, is being or is likely to be damaged. It must indicate a greater danger than is associated with the normal use of the process/product, or a danger that is not usually associated with it.
- That information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

How to Raise a Concern

As a first step, staff should normally raise concerns with their immediate manager or senior manager. This depends, however, on the seriousness and sensitivity of the issues involved and who is thought to be involved in the malpractice. If the concern involves line management, staff may make a direct approach to the Principal, a Director or Head of School. Concerns are better raised in writing. Staff are invited to set out the background and history of the concern, giving names, dates, and places where possible, and the reason why they are particularly concerned about the situation. If an individual does not feel able to put a concern in writing, they can telephone or meet the appropriate Manager.

The earlier a concern is expressed the easier it is to take action.

Although an individual is not expected to prove the truth of an allegation, they will need to demonstrate to the person contacted that there are sufficient grounds for concern.

Staff may invite a trade union, or relevant professional body/individual to raise a matter on their behalf.

How the College will respond

The action taken by the College will depend on the nature of the concern and its seriousness. The matters raised may:

- be referred to the Board.
- be investigated internally.
- be referred to the Internal Audit Team.
- be referred to the Police.

- form the subject of an independent inquiry.
- Be referred to any other appropriate external professional or regulatory body.
- In order to protect individuals and the College, initial enquiries will be made to decide whether an investigation is appropriate, and if so, what form it should take. Concerns or allegations which fall within the scope of specific procedures (for example, child protection or discrimination issues) will normally be referred for consideration under those procedures.
- Some concerns may be resolved by agreed action without the need for investigation.

Within ten working days of a concern being received, the College will write to the individual:

- acknowledging that the concern has been raised.
- indicating how it proposes to deal with the matter.
- giving an estimate of how long it will take to provide a final response.
- indicating whether any initial enquiries have been made, and
- Indicating whether further investigations will take place, and if not, why not.

The amount of contact between the people considering the issues and an individual staff member will depend on the nature of the matters raised, the potential difficulties involved, and the clarity of the information provided. If necessary, further information will be sought.

When any meeting is arranged, staff have the right, if desired to be accompanied by a college colleague who is not involved in the area of work to which the concern relates.

The College will take steps to minimise any difficulties which may be experienced as a result of raising a concern. For instance, if an individual is required to give evidence in criminal or disciplinary proceedings, the College will provide advice about the procedure.

The College accepts that individuals need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, they will receive information about the outcomes of investigations.

How the Matter can be Taken Further

This Policy is intended to provide staff with an avenue to raise concerns within the College. If an individual is not satisfied with the outcomes and feels it is right to take the matter outside the College, the following are possible contact points:

- Relevant professional bodies or regulatory organisations.
- Solicitor.
- The Police

A member of staff taking the matter outside the College needs to ensure that they do not disclose confidential information or that disclosure would be privileged.

The Responsible Officer

Whilst the Principal has overall responsibility for the maintenance and operation of this Policy, where an individual member of staff has a concern about the Principal or Director, they may wish to raise this directly with the Board. In that case, they may choose to contact the Managing Director. Otherwise, the Principal will maintain a record of concerns raised and the outcomes (in a form which does not endanger confidentiality) and will report as necessary to the Board.

Last review: 06.03.2026. To be reviewed: 28/02/2027