



# **Quality Manual 2018-2019**

**MILLENNIUM PERFORMING ARTS**

Limited Company

Registered in England & Wales No. 03308803

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## 1. Welcome and Scope

### 1.1 Introduction

- 1.1.1 This Quality and Standards Manual is the means by which MPA satisfies the requirements of its stakeholders with particular reference to management responsibility for the assurance and enhancement of quality across the organisation. This document operates in conjunction with MPA's Academic Regulations, both have been produced in accordance with the requirements of the UK Quality Code for Higher Education.
- 1.1.2 MPA is obliged to ensure that this Manual is fully and completely understood by its students and staff and that its procedures, guidelines and ethos are implemented and maintained at all times.
- 1.1.3 MPA's Head of Academic Quality & Curriculum is responsible for the control of all matters pertaining to the implementation of this Quality Manual; however, the assurance and enhancement of quality is fundamental to all the work undertaken by MPA and, as such, all personnel are required to actively participate in these policies, procedures and practices.

### 1.2 Implementation: Staff Responsibilities

- 1.2.1 All staff must take part in training and professional development in order to drive up standards and follow MPA's policies and procedures relating to their work.
- 1.2.2 Staff must reflect the ambitions of the College, to provide excellence in education and training and identify strategic priorities for MPA in response to internal and external demands and initiatives.
- 1.2.3 Staff are expected to manage activities relevant to the annual quality management cycle in their areas.
- 1.2.4 All staff are required to respond promptly to feedback regarding their provision, providing reinforcement regarding positive feedback and initiating and monitoring responses to negative feedback.
- 1.2.5 Senior staff are required to monitor performance in their department, ensuring appropriate staff development, induction and appraisal or review activity as appropriate.
- 1.2.6 Nominated senior staff are responsible for reviewing student retention, achievement, and attendance plus equality and diversity figures.
- 1.2.7 All staff are responsible for reviewing measures taken to ensure safeguarding.
- 1.2.8 All staff are expected to maintain current course and assessment records as appropriate.

### 1.3 Implementation: Quality Staff Responsibilities

- 1.3.1 The Head of Academic Quality and Curriculum is responsible for the promotion, oversight and scrutiny of the efforts of College management and staff to develop and maintain a culture of continuous quality improvement, enhancement of learning opportunities and the raising of standards by improving retention, achievement, success and progression rates.
  - 1.3.2 The Head of Academic Quality and Curriculum works together with the Management Team to promote quality awareness with all staff to achieve a total quality culture, proposing standards and procedures to drive forward the quality ambitions of MPA.
  - 1.3.3 Senior Staff together with the Head of Academic Quality and Curriculum oversee and support the implementation of the operational aspects of a continuous improvement culture; contribute to strategic planning, particularly in relation to total quality and support procedures through which to evaluate the effectiveness of learner satisfaction.
  - 1.3.4 The Head of Academic Quality and Curriculum is responsible for developing a range of qualitative and quantitative indicators through which efficiency and effectiveness of MPA can be monitored and evaluated, whilst offering support and training in areas of weakness to improve practice, reporting to the Directors with assessments of the College's quality performance.
- 1.4 **Implementation: Student Responsibilities**
- 1.4.1 All students are asked to engage in MPA measures to drive up standards and follow MPA's policies and procedures relating to their College activities.
  - 1.4.2 All students are expected to respond promptly to feedback regarding their actions, behaviour and any monitoring requests to help develop training and education provision at MPA.
  - 1.4.3 All students are responsible for remaining vigilant to all issues pertaining to safeguarding.
  - 1.4.4 All students are asked to adhere to the Student supported, Code of Conduct (see Student Handbook).

## 2. Quality and Standards Policy

### 2.1 Introduction & Scope

- 2.1.1 MPA has developed this Policy in accordance with the principles established by the UK Quality Code for Higher Education. This Policy applies to all students and staff (i.e. full time, part time and/or part time staff without fixed working patterns) as well as other staff members (including "temps", contractors, visiting teachers or assessors and moderators).
- 2.1.2 In order for our approach to be successful, MPA recognises that there must be clear lines of responsibility and accountability, and that there must be adequate training, support and guidance to enable staff to implement the Quality Manual's policies and procedures, consistently and equitably.

## 2.2 Vision, Mission & Core Values

2.2.1 VISION: Led by the motto, "Theatre, as a profession, is a way of life", MPA strives to become a provider known for ensuring inspirational teaching and learning experiences for every student.

2.2.2 MISSION STATEMENT: MPA will provide an outstanding opportunity for young performers. Success in Dance and Theatre begins with a creative, inspired and disciplined staff, in a progressive environment where everyone can realize their true potential. We are a leading, award-winning Professional Performing Arts training provider, known for its high calibre of students and staff. Our staff and management team nurture a creative, inspirational teaching and learning experience for every student.

### 2.2.3 CORE VALUES:

- *Supporting achievement:* MPA supports achievement, recognising professional levels of technical excellence and artistry whilst developing thinking able to demonstrate creative achievement and personal professional growth
- *Individual care:* MPA cares about individuals through teaching advanced and complex performance activities, safely and effectively, encouraging use of the body expressively to communicate to an audience through the language of dance, music and the spoken word
- *Inclusive practice:* MPA embraces equality and diversity in all teaching and learning practices supporting inclusivity within the Performing Arts profession
- *Professional etiquette:* MPA expects our graduating artists to be committed to upholding the professional standards of the industry, including its etiquette. As articulate, team players dedicated to maintaining high-level practical skills, they will be world class performers; fully developed, relevant, highly employable individuals, who will inspire and influence the future of the profession.

### 2.3 AIMS:

- To provide study which meets the standards and requirements of students who wish to pursue a career in musical theatre/dance/ acting/singing
- To achieve a professional level of technical excellence and artistry in our students
- To assist our students to develop a kinetic intelligence and understanding of varied dance techniques, singing and acting as art forms
- To create the thinking artist through contextual and related studies, helping students to demonstrate substantially extended creative achievement and personal professional growth in all subjects
- To help students to undertake performance related activities of advanced and complex nature safely and without injury and use the body expressively to communicate to an audience through the language of dance, music and the spoken word.

## 2.4 Compliance

2.4.1 To ensure compliance with the expectations of the UK Quality Code for Higher Education MPA seeks to maintain the threshold academic standards of our programmes while assuring and enhancing the quality of the learning opportunities made available to our students and ensuring that we produce information about the learning opportunities we offer that is fit-for-purpose, accessible and trustworthy.

- 2.4.2 To nurture a culture of continuous improvement within the constraints of the resources available, MPA aims to continuously improve the quality of the student experience. MPA involves its students in the processes of assuring and enhancing quality. MPA recognises the valuable contribution that students can make to the assurance and enhancement of in-house quality, and we are therefore committed to seeking the views of our students through a variety of mechanisms, and using the feedback that we gain in so doing, to improve the quality of their experience.
- 2.4.3 MPA management seeks to involve staff in the process of assuring and enhancing quality, recognising the valuable contribution that our staff can make to the assurance and enhancement of in-house quality, and we are therefore committed to seeking the views of our staff through a variety of mechanisms, and using the feedback that we gain in so doing, to improve the quality of their experience.
- 2.4.4 MPA recognises the valuable contribution that our external peers can make to the assurance and enhancement of in-house quality, and we are therefore committed to constantly evaluating our approach against those of our peers (in this context the term 'peer' is interpreted broadly to include academic institutions and staff as well as professional bodies and practitioners); in this way we can be assured that we are maintaining appropriate standards while demonstrating our commitment to externality.

## 2.5 **Policy Operation**

- 2.5.1 MPA is committed to developing its Quality Manual and its integral policies and procedures through regular quality mapping in order to ensure continued compliance with the expectations of the UK Quality Code for Higher Education.
- 2.5.2 As part of the implementation of this Quality and Standards Policy, in order to maintain oversight for each separate area of quality management a formal Academic Committee structure has been embedded at MPA. This structure seeks to support, monitor and review the implementation of the indicators of sound practice as defined within the UK Quality Code for Higher Education.
- 2.5.3 The Head of Academic Quality and Curriculum seeks to ensure that copies of meeting minutes, and associated papers, of both operational and Academic Board sub-committees are made available to all stakeholders upon request.
- 2.5.4 MPA operates a Governance Advisory Group to advise and support the Board of Directors. The Management Team report directly to the Directors and operate the Academic Board, the Finance Committee and the Administration Committee (with a Reception Team sub-committee). The Academic Board delegates responsibility to its sub-committees (Course Boards (with Curriculum Planning and Review meetings and Teaching and Quality Enhancement meetings); Welfare Committee; Head of Department Committee; Student Review Committee and the Student Representative Committee). Additionally, the College supports relevant Exam Boards and Assessment Review Groups as required by our Awarding partners.

## 2.6 **Review Processes**

- 2.6.1 MPA is committed to periodically reviewing the effectiveness of its approach to quality assurance, with reviews conducted by the Head of Academic Quality and Curriculum and reported to the Board of Directors and the Academic Board as appropriate.
- 2.6.2 With respect to maintaining academic standards, the College seeks to ensure that all programme structures accord with the requirements of the Framework for Higher Education Qualifications (FHEQ) and conform to the appropriate requirements of relevant industry and professional standards.
- 2.6.3 With respect to assuring and enhancing academic quality and standards, MPA seeks to ensure that:
- the processes in place for programme approval, modification, suspension and closure work effectively, and the views of students, alumni, staff, academic peers, employers and/or professional sector bodies
  - admission processes are fair, explicit, timely and consistently applied
  - excellence in learning and teaching is promoted, supported, recognised and rewarded and that all students are enabled to develop as independent learners, to study their chosen subject(s) in depth and to enhance their capacity for analytical, critical and creative thinking
  - learning resources and arrangements are working effectively in support of student learning and enable students to develop their academic, personal and professional potential
  - we continue to take deliberate steps to engage all students, individually and collectively, as partners in the assurance and enhancement of their educational experience
  - we continue to operate equitable, valid and reliable processes of assessment, including for the recognition of prior learning, which enable every student to demonstrate the extent to which they have achieved the intended learning outcomes for the credit or qualification being sought
  - we continue to make scrupulous use of external examiners
  - academic appeals and student complaints processes are fair, explicit, accessible, timely and consistently applied
  - With respect to information about our training and education provision, MPA ensures that we produce information about the learning opportunities that we offer which is fit-for-purpose, accessible and trustworthy
  - we take deliberate steps to formally and actively seek out, prevent and correct areas and/or issues of concern on an ongoing basis
  - all formal processes are linked to an appropriate point in the committee and/or management structure at which decisions can be taken, actions defined (and subsequently monitored and reviewed) and responsibilities and timescales delineated

## 2.7 **Summary**

- 2.7.1 Millennium Performing Arts values the importance of strong, co-ordinated management of our quality procedures and makes use of external benchmarks to demonstrate our compliance with recognised standards.
- 2.7.2 In accordance with this we maintain a range of Policies and Procedural guidelines (through our Academic Regulations document). Please see additional documents for future detail.

## **3. Quality Management Strategy**

### 3.1 **Introduction**

3.1.1 MPA's Quality Management Strategy is driven by the importance placed upon delivering high quality learning and training opportunities in a supportive environment and which responds to the needs of each student. This culture of quality enhancement is supported by each staff member at MPA.

3.1.2 It is recognised that quality standards can only be maintained by a process of regular evaluation and continuous improvement. As such, MPA operates within an overall Quality Framework of activity managed via our annual Quality Management Cycle and expects both students and staff to support regular, day-to-day operations at suitably high standards. Procedures across the MPA provision are regularly monitored to identify problems, for which corrective actions are implemented and reviewed. It is recognised that continual improvement is achieved by raising standards as performance targets are reached and reviewing objectives accordingly.

3.1.3 In re-focusing the MPA approach to Quality Management, the overarching principles of the Quality Code have been used as guidance; describing the characteristics required for MPA. These elements help to shape our objectives:

- All students are treated fairly, equitably and as individuals.
- Students have the opportunity to contribute to the shaping of their learning experience.
- Students are actively informed at appropriate times of matters relevant to their programmes of study.
- All policies and processes relating to study and programmes are clear and transparent.
- Strategic oversight of academic standards and academic quality is at the highest level of academic governance of the provider.
- All policies and processes are regularly and effectively monitored, reviewed and improved.
- Appropriate external involvement exists for the maintenance of academic standards and the quality of learning opportunities.
- Staff are supported, enabling them in turn to support students' learning experiences.

### 3.2 **Quality Assurance Mechanisms**

3.2.1 MPA has a strong commitment to continual improvement to ensure quality standards are maintained and enhanced throughout the College. MPA believe that it is this process that is central to developing and maintaining quality improvement. These self-assessment processes require careful co-ordination and action planning to ensure good practice is recognised and changes can be made where necessary. MPA create a detailed review cycle annually which clearly sets out who is responsible, when activities/ actions need to be expected and what is to be done at each stage. The activities seek to include feedback and opinion that involves a wide range of people within the MPA community.

### 3.3 **Academic Monitoring Activity**

3.3.1 The following tasks are managed via the Teaching & Quality Enhancement (TQE) committee and the Board of Directors through the Academic Board. This enables MPA to:

- Take a holistic view of the quality and standards of programmes

- Provide a formally structured opportunity to reflect and develop new approaches to enhance current practices
- Follow independent and/or external confirmation of the quality and standards attained across programmes
- Offer an opportunity for good practice to be recognised, verified and disseminated.

3.3.2 The MPA process of review and evaluation enables staff to consider programme(s) and analyse whether there are any changes need to be made. This ensures all aspects of the course are scrutinised and assists with assurance of the quality and standards of the programme. The committee will use an evaluation template which covers:

- An outline of the review process required and a schedule of activities
- Confirmation of the members of the evaluation panel (including external representation if appropriate)
- Any programme issues (with evidence as appropriate)
- Discussion of documentary requirements and responsibilities
- Timeline and communications plan for completion
- Details of student consultation (if required)
- Sources of further information about industry/national/international requirements
- The possible outcomes of the process

3.3.3 Areas for consideration through this process include:

- MPAs existing programmes of study; continuing relevance, currency, ability to meet stated aims and objectives/learning outcomes and resourcing
- Recommendations from external review/ inspection/ validation reports
- Schedule of activity; external audit/ evaluation or planning meetings or course evaluation administration procedures.

3.3.4 The Head of Academic Quality & Curriculum, the relevant Course Leader and Directors will communicate with relevant staff following completion of this template and arrange timeline / date for initial meeting (or submission of documents for consideration). Following the evaluation procedure; a summary of the programme evaluation will be produced, approved by the TQE, indicating the relative strengths and success of the programme as well as those aspects of the programme which require attention and changes to the programme which the course team may wish to make. This process is overseen by the Academic Board.

#### 3.4 **Quality Management Cycle**

3.4.1 MPA has a strong commitment to continual improvement to ensure quality standards are maintained and enhanced throughout the College. MPA believe that it is this process that is central to developing and maintaining quality improvement. These self-assessment processes require careful co-ordination and action planning to ensure good practice is recognised and changes can be made where necessary.

3.4.2 MPA create a detailed review cycle annually which clearly sets out who is responsible, when activities/ actions need to be expected and what is to be done at each stage. The activities seek to include feedback and opinion that involves a wide range of people within the MPA community. This cycle is monitored by Senior Management (through

reporting by the Teaching & Quality Enhancement Committee). Please see Appendix for a copy of the 2018-19 Cycle.

### 3.5 **Key Performance Indicators (KPIs)**

- 3.5.1 MPA use a range of KPI measurements to quickly learn how MPA performed against set standards. These standards are reviewed and set each year by the TQE, Academic Board and Board of Directors. MPA use a range of tools including student and staff questionnaire evaluations, assessment data, application and enrolment data and graduate employment statistics. The Higher Education Statistics Agency (HESA) publishes a set of performance indicators for all UK higher education institutions each year and as such, MPA monitor achievement in relation to (a) widening participation; (b) non-continuation rates; (c) completion rates and (d) employment of graduates.

## **4. Teaching, Learning & Assessment Strategy**

- 4.1 Professionalism lies at the heart of Millennium Performing Arts. Our staff and management team nurture a creative, inspirational teaching and learning experience for every student.
- 4.2 Students, employers and the profession, recognise the value of our professional training. UK and international applicants know that they will receive a world-class training at MPA. We offer our students the opportunity to develop their talents in versatility, creativity and performance. We provide encouragement for students to critically evaluate their own work and the work of others. Students are required to demonstrate the ability to compete equally and immediately upon graduation, in the profession.
- 4.3 Today, our graduates need to be able to articulate their understanding of the variety of disciplines within dance, singing and acting in relation to other art forms and work confidently both independently and collaboratively in a range of different contexts. The challenging world of professional theatre benefits from our graduates knowledge and understanding of body movement and vocal skill in a disciplined, competitive environment.
- 4.4 Our Teaching, Learning and Assessment Strategy highlights the importance we place upon supporting students' learning. We deliver our training with adherence to our Equality and Diversity Policy, offering an inclusive, welcoming atmosphere of positive training methods. We operate an open access policy, welcoming applications from talented individuals with the potential to succeed in the profession. Our Strategy reinforces our aim to provide study which meets the standards and requirements of all students who wish to pursue a career in Musical Theatre and Dance.
- 4.5 At MPA we fully encourage the development of the thinking artist. As such; we look to assist our students to demonstrate individual creative achievements and personal professional growth in all subjects of study. They should become increasingly analytical as they develop their professional skills and make well-informed decisions relating to both their personal and professional development. Our students and staff work cohesively to achieve these goals and we aim to offer individual, tailor-made support to enhance each students learning experience at MPA.

- 4.6 We will offer our students a dedicated, in-depth and intensive training experience that replicates the high quality required by the profession. This provides MPA with a strong, professional approach, with a dedicated, disciplined work ethic reinforced by teaching staff and guest tutors, who are at the forefront of their field and who can bring their innovative, inspired approach to our studies. This also offers an opportunity for students to learn from current, working-professionals, in realistic ways, guided by excellent choreographers/directors in a work-like industry-led curriculum.
- 4.7 Assessment is an integral part of the learning process and must be fair and transparent. It must encourage learning, by engaging students appropriately in the assessment process and by offering them feedback that enables them to improve their work further.
- 4.8 We encourage our students to make beneficial contacts and useful connections at all levels. As an active highly regarded, Performing Arts training provider, with staff current and active in the professional industry, we are part of an elite group of London based training providers. Based in London, with access to professional theatre, creative culture and industry-leading companies; our students can learn and contribute to our industry.
- 4.9 At MPA our professional leadership, in-depth, relevant preparation and encouragement of continual development are all essential aspects that will ensure that our teaching is of high quality. We seek to enhance learning by continually monitoring, reviewing and improving what we do, identifying and sharing highly effective teaching and learning practice from within and beyond MPA.
- 4.10 Here we identify many of the attributes that we believe should be characteristic of MPA graduates. We name the central ideas that we believe will inform our approaches to learning and teaching so that this aspiration can be realised. Finally we identify the areas in which we will particularly be working in order to ensure that we offer our students the best possible experience of learning at MPA.
- 4.11 On graduation our students will be able to:
- Demonstrate substantially extended creative achievement and personal professional growth in all subjects.
  - Use the body expressively to communicate to an audience through the language of dance, music and the spoken word.
  - Develop a knowledge and understanding of body movements and vocal skills and how to undertake performance related activities of advanced and complex nature safely and without injury.
  - Articulate an understanding of dance, singing and acting in relation to other art forms.
  - Work confidently both independently and collaboratively in a number of different contexts.
  - Critically evaluate own work and the work of others.
  - Demonstrate the ability to compete equally and immediately in the profession.
- 4.12 We believe that learning at MPA should be informed by a number of central ideas:
- Student centred - That achieving a beneficial impact on students' learning should be a principal concern in all decisions related to teaching and assessment.

- Inclusive - That the MPA experience should be available to those who can benefit from it, irrespective of their social and economic background, and that appropriate opportunities for learning should be available for all students, responsive to their diverse identities and needs.
- Inquiry-led - That a higher education is characterised by processes of learning through active inquiry and improvement, in which students and staff are alike engaged.
- Relevant and current curriculum - That MPA offers access to the best level of technique, skill and learning provision that is known in all fields of student study, drawing on the expertise of staff at MPA and the wider educational community and professional industry.
- Responsibility of all - That student should assume increasing responsibility for and autonomy in their own learning and development.
- Assessment based - That assessment should be fair and transparent and should support learning
- Innovative - That imaginative use should be made of resources, space, methods, technologies, and opportunities to maximise occasions of learning
- Support for learning - That MPA has a responsibility to work efficiently and effectively in order to create the conditions in which learning can take place and its staff a responsibility to be fully professional in their support of learning.

4.13 MPA will develop an environment that supports the main areas below:

- CURRICULUM - Formal and informal curricula, formative and summative assessment and feedback professional opportunities and a range of teachings that will be of benefit in future personal and working lives.
- RESOURCES - Physical and educational environment that supports learning, library, technology enhanced learning; local community study support.
- STUDENT SUPPORT - A supportive environment for individual students, personal tutors; study skills; employability, personal effectiveness; technology-enabled environment; welfare; accommodation.
- STAFF EXPERTISE - Those who teach and support learning are appropriately prepared, supported and recognised for their role, teaching and supervision expertise, including use of learning technologies; disciplinary and professional research expertise; evidence-informed practice; capacity for innovation; sharing effective practice; leadership; recognition and reward.
- QUALITY ASSURANCE - Provision for teaching and learning is of high quality and that we are continually seeking to improve students' educational experience Feedback from students, programme approval and review; periodic review; external examining; key performance indicators; benchmarking.

## 5. Moderation Strategy

5.1 Our Internal Moderation process helps us to monitor and maintain the appropriateness, consistency, transparency and fairness of assessment. All subjects and assessments delivered as part of any training at MPA are subject to Internal Moderation. These processes operate throughout the academic year and at final (summative) assessments. This ensures that student learning and assessment:

- Is reviewed at different stages of course delivery
- Receives evaluation relating to the quality of formative feedback during studies; in preparation for assessments

- Undergoes a sampling procedure of sufficient size and structure to ensure quality assurance standards are maintained
- Is monitored for consistency and standardisation
- Can be confirmed as appropriate and in line with best practice.

5.2 At MPA, we aim to complete all Internal Moderation processes and sampling before individual assessment grades are given to students and therefore before the various assessment results are presented to the Exam Board (annually). External Examiners will consider the MPA Internal Moderation as part of the audit of assessment processes for their courses. The Internal Moderation for a particular assessment (assignment / panel grading) considers the marks awarded to assessment components and confirms whether the standard of marking is appropriate. Moderation at MPA also considers quality of assessment feedback and appeals status (if necessary).

5.3 **Moderation Process** - At the beginning of the academic year, the Moderation team consider all unit delivery and assessment schedules for the year/range of courses/events planned. An assessment matrix is created to provide an initial guide as to the quantity of sampling/ assessment observation required in that year. Matrix features will include:

- Double marking (assessors chosen from alternative course delivery with relevant subject experience): two different members of staff assess the work and reach independent conclusions as to the mark to be awarded. Subsequently they meet to discuss the marks, and agree a final mark. If no agreement is reached, a third marker may be appointed. A marksheet recording the original marks for the assessment component must be retained and may be reviewed by the internal verification team / external examiner. The marksheet should be signed off by both markers, to confirm agreement on the marks awarded, including the final agreed mark.
- Sampling (carried out by Course Leaders / Head of Curriculum): Two different members of staff assess the work and reach independent conclusions as to the mark to be awarded. Subsequently they meet to discuss the marks, and agree a final mark. If no agreement is reached, a third marker may be appointed. A marksheet recording the original marks for the assessment component must be retained and may be reviewed by the internal verification team / external examiner. The marksheet should be signed off by both markers, to confirm agreement on the marks awarded, including the final agreed mark. A sample of marked work is reviewed by another staff member (i.e. other than the initial marker), to confirm that standards are appropriate and assessment criteria have been applied appropriately. If the verifier considers that the marks awarded are consistently higher or lower than appropriate, do not make appropriate use of the full marking scale available or are inconsistent, they will discuss the matter with the Principal to agree the steps appropriate to ensure that the correct marks are awarded for the entire cohort. This may include, for example, moving the marks of the whole cohort (not just those included in the sample), or requiring a re-mark, advising that better use be made of the full range of marks available.
- Practical assessment panel observation (Carried out by members of the MPA Internal Moderation Team): Practical assessment panel observation: For some practical assessments, the mark is awarded by a panel of experts, who consider each piece, make individual notes and collectively agree on the final mark. This process is used for all students within these practical assessments and so a MPA Moderation Team member will simply observe the process to ensure parity and fair assessment process. A marksheet recording all assessment panel members individual, original marks for each piece must be retained and may be

reviewed by the external examiner. The final marksheet is signed off by all members of the panel to confirm agreement on the final mark awarded.

- The Directors, Principal, Head of Academic Quality & Curriculum and Heads of Department will determine the overall picture of the matrix each year (Internal checkModeration sub-committee of Curriculum Review Board).
  - The MPA Quality Assurance strategy includes Staff Appraisal and Teaching Observations as a fundamental Internal Moderation measure – managed directly by the Principal (utilising MPA Staff Management system with direct observations and grading of staff (risk status).
- 5.4 Within the sampling process; no student requests for moderation are considered. It will include a broad range of marks, including some from each level of attainment. The sample size is determined by the square root of the total number of students undertaking each assessment element, with a minimum of ten students' work to be considered. Where there are fewer than 10 students, all work will be considered. Double marking is carried out through random allocation at the beginning of the year, on average two assessment elements will have 20% of the assignments double marked.
- 5.5 The purpose of this method of internal moderation is to ensure that standards have been applied consistently; once this is determined, from the sample considered, the marks for those items not verified can be considered secure. Documentation recording the original marks awarded prior to a decision on the final mark are retained and made available to the external examiners as necessary.
- 5.6 Prior to external verification, the Exam Board convene. The MPA Internal Moderation team, the Principal, Head of Academic Quality & Curriculum check the mark profiles for each student and ensure that the profile is appropriate. This process is recorded and presented in summary to the MPA Exam Board, annually for confirmation and sign off. Learners are contacted with grades at end of Academic year and work returned to them following completion of all external moderation upon graduation. Mark sheets are held by MPA for a minimum of 3 years following graduation.
- 5.7 Once a term the Internal Moderation sub-committee meet to ensure standardisation of procedures and to monitor the progress of moderation activities. This committee also agrees annual Internal Moderation plans for proposed courses and/or external verification requirements as appropriate.
- 5.8 Internal Moderation documentation can be found in the Appendix.

## 6. Enhancement Strategy

### 6.1 Introduction

MPA values its reputation for providing training of outstanding relevance and quality. Our vision and mission statements are grounded in a clear sense of purpose which has a strong foundation in quality of teaching and enhancing the student experience.

6.2 The College have prioritised the formal development of this strategy from its initial stages as a carefully managed Resource Development Plan to match HE growth. It now seeks to make a clear links to recognise and share good practice; develop relevant subject specific skills and abilities, combined with a critical evaluation of the academic and training needs relevant to MPA. As such, this Strategy articulates our commitment to systematically improving the quality of our provision and the ways in which our students' learning opportunities are supported. It starts from a perspective that first recognises good practice and then seeks to share this with our peers both internally and externally.

### 6.3 **Our beliefs**

Our Motto: Theatre, as a profession, is a way of life.

Mission Statement: MPA will provide an outstanding opportunity for young performers supported by a creative, inspired and disciplined staff in a progressive environment where everyone can realize their true potential. MPA's management team nurture a creative, inspirational teaching and learning experience for every student.

#### Core Values:

- MPA provides suitable training and study opportunities which meet the standards and requirements of students who wish to pursue a career in musical theatre /dance /acting /singing at a professional level with technical excellence and artistry
- MPA supports achievement, recognising professional levels of technical excellence and artistry whilst developing thinking artists able to demonstrate creative achievement and personal professional growth
- MPA cares about individuals through teaching advanced and complex performance activities, safely and effectively, encouraging use of the body expressively to communicate to an audience through the language of dance, music and the spoken word. Students are assisted to develop a kinetic intelligence and an understanding of a variety of art forms supported through contextual and related studies, helping students to demonstrate substantially extended creative achievement and personal professional growth in all subjects
- MPA embraces equality and diversity in all teaching and learning practices supporting inclusivity within the Performing Arts profession
- MPA expects our graduating artists to be committed to upholding the professional standards of the industry, including its etiquette. As articulate, team players dedicated to maintaining high-level practical skills, they will be world class performers; fully developed, relevant, highly employable individuals, who will inspire and influence the future of the profession.

### 6.4 **Responsibility**

The implementation and monitoring of this Strategy are delegated by the Academic Board

to the Teaching and Quality Enhancement Committee (TQE). Members are responsible for overseeing the implementation of a framework of activity that is designed to pursue these aims through review, reporting and dissemination throughout the College. It maintains awareness of important learning priorities for each academic year and seeks to maintain operational contact with awarding partners and regulators for supporting developments in the future. Through the implementation of this Strategy, the TQE aims to assist MPA in suitable development as a small, specialist institution, to adhere to relevant learning and teaching values that suit this professional identity and set out the standards of learning and teaching experiences that MPA expects its students to receive.

### 6.5 **Our approach**

MPA notes the relevant HE QAA definition of Enhancement: 'deliberate steps taken at provider level to improve the quality of student learning opportunities'. As such, the key features of our enhancement framework have considered:

- A strategic approach
- Integration of initiatives in a systematic and planned manner
- An ethos which expects and encourages enhancement
- Identification, support and dissemination of good practice
- Oversight and reporting appropriate to our size and structure
- Staff and student (current and past) stakeholder engagement to support MPA development progression, whilst remaining current and relevant to working practices in the sector.

At MPA, our definition includes 'explicit processes put in place to improve the student experience in a time-framed manner'. Our Quality Assurance and Quality Enhancement mechanisms support this approach, evidenced by the value we place on regular and timely activity which includes:

- Annual reporting and monitoring (internal and external processes to validating and regulatory bodies) including consideration of External Examiner oversight
- Statistical review of data (performance, complaints/ appeals, academic misconduct, student surveys (satisfaction, internal and external reporting) and Graduate data
- Initiatives to promote and share best practice amongst teaching and assessing staff
- Professional development for staff (including academic practice) and team / departmental meetings
- Robust committee reporting
- Learning, teaching and assessment review, peer observation and appraisal activity
- Student support development and resource planning (VLE development, access and assessment models)
- Employability reviews and industry experience
- Graduate community review projects

- Student voice activities / involvement of student opinion and consultation activities/ collaborative projects with students

Under this Strategy, MPA will focus on:

- Fostering a culture of continuous enhancement and improvement throughout MPA
- Encouraging everyone involved in teaching and supporting learning to play their part in enhancing as well as assuring quality
- Encouraging relevant, current training methods suitable for the developing needs of the College in HE and FE and the professional context it works within
- Being inclusive in our approach to provision for suitable programmes
- Valuing the initiative of individuals and departmental teams in seeking to enhance the student experience
- Encouraging staff to enhance their teaching practice by keeping up to date with the latest pedagogic research and by participating in an enhancement-led peer observation scheme
- Improving quality by encouraging Course Leaders and Heads of Department to ensure cross-curricular activity in terms of content and assessment
- Ensuring Graduates are well-prepared for employment and professional practice through our curriculum design and pedagogy, enabling students to develop strong skills and attributes relevant to professional employment
- Providing training opportunities for all staff engaged in learning and teaching (developing HEA accredited programmes and qualifications for continuing professional development of academic staff)
- Encouraging the dissemination of good practice throughout the College through the development of staff networks to support staff in research and teaching
- Encouraging staff to use technology to support learning, teaching and assessment where practicable
- Providing a specialist portfolio of high quality provision at undergraduate and taught postgraduate level; mindful of market requirements and currency through a robust process of course approval, validation and review
- Ensuring that the curriculum is informed by research and professional practice which engages students and meets their needs wherever they are studying and is aligned with the requirements of all applicable professional accreditations
- Improving and developing our learning and teaching spaces, monitoring and adapting learning and teaching spaces to changing learning needs, developing greater flexibility in time-tabling where possible
- Increasing levels of progression, retention and achievement, providing every student with an equal and effective opportunity to achieve the intended learning outcomes

- Ensuring everyone involved in teaching and supporting student learning is appropriately qualified, supported and developed
- Ensuring every student is provided with clear and current information that specifies the learning opportunities and support available to them
- Ensuring that MPA continues to take deliberate steps to assist every student to understand their responsibility to engage with the learning opportunities provided and shape their learning experience. Every student is enabled to monitor their progress and further their academic development through the provision of regular opportunities to reflect on feedback and engage in dialogue with staff
- Attracting students with the ability and ambition to excel, and inspire them to achieve their potential working in partnership with the student body to increase student engagement in all aspects of College life including the design and delivery of their education and training

## 7. Governance Strategy

- 7.1 MPA's Governance Strategy has been developed to ensure compliance and best practice is maintained across the College. It is recognised that good governance is essential to the maintenance of academic standards, the quality of the student learning experience and effective organisational management and seeks to consolidate the specific Governance arrangements suited to supporting the activities of MPA, as an Alternative Provider and professional training establishment.
- 7.2 As noted in the Quality and Standards Policy, MPA operates a structure of Governance to include Academic and Management Committees. See appendix for diagram.
- 7.3 **Chairs' Responsibilities** - Committee Chairs are drawn from experienced members of staff, normally Senior Staff and are responsible for:
- Ensuring that meetings are quorate and abides by their Terms of Reference
  - Bringing the meeting to order and regulating the conduct of meetings
  - Following the agenda and controlling the amount of time spent on each item
  - Leading members towards an agreed decision or conclusion
  - Ensuring that agreed actions are appropriate, delegated and implemented within an agreed timescale in agreement with the Head of Academic Quality & Curriculum
  - Approving all agendas and minutes prior to issue and ensuring they are circulated to all members as well as those on the distribution list
  - Agreeing meeting dates and ensuring these are circulated to all members in liaison with the Principal
- 7.4 **Attendance and voting at meetings** - All members are expected to be present at all meetings or to have sent apologies. With the exception of the Chair, attendance by Skype, video or tele conference (or similar) is permissible at any meeting. Where attendance is not possible, members are encouraged to submit written comments to any papers to the Chair in advance of the meeting. All MPA Committees shall make every

effort to reach a decision by consensus. Where it proves necessary to vote on any matter it shall be determined by a simple majority. Each member present shall have one vote; in the case of an equal vote, the Chair shall have an additional casting vote.

**7.5 Governance Advisory Group** - The Directors of MPA have been supported by Consultants and an Advisory Group since the College's inception. The Senior Management Team and Directors wish to continue this method of guidance, formalising the relationship between the Directors, within the Senior Management Team, and a newly formed Governance Advisory Group with particular responsibility for the following areas:

- the long-term direction of the College, including its objectives or purposes
- implementing policies and activities to achieve objectives
- clear governance directives to the Management Team of the College

**7.5.1 Roles and Responsibilities of Governance Advisory Group Members:**

- The purpose of the Governance Advisory Group is to provide strategic advice to the Senior Management Team via the Board of Directors on the full range of activities undertaken to achieve the mission and aims of Millennium Performing Arts. Each key member of the Group would have a strategic and/or evaluative role.
- Terms of Reference:
  - a) Champions research and activity that is interdisciplinary and crosses the full range of potential improved understanding of safe and progressive physical and mental training relevant to a range of employment sectors
  - b) To establish and keep under review the Risk Register of Activity and the College's Critical Incident policy and procedures
  - c) To consider recommendations made by committees with regard to the working of the Governance Advisory Group
  - d) To establish and keep under review arrangements for the operation of the Governance Advisory Group
  - e) To oversee arrangements for Member involvement in formulating and monitoring the Colleges' action plans for external reporting
  - f) To keep under review the resources development plan
  - g) To be available and respond to matters of particular difficulty, sensitivity or emergency and offer advice to the Senior Management Team
  - h) To assist with consideration of financial statements and an annual budget position statement including reporting any anticipated alterations/ issues to the appropriate funding bodies if required
  - i) To ensure that the College operates within the relevant Financial Regulations
  - j) To ensure, as far as is practical, that Health and Safety issues are appropriately prioritised across the College
  - k) Additional items which the Directors may wish to include
  - l) To meet soon after the MPA termly briefings for Staff and Management to agree the work of the Governance Advisory Group Body and its committees for that term and beyond

**7.6 Board of Directors and Senior Management Team** - The Board of Directors is the senior body acting with legal and strategic/operational accountability for Millennium Performing Arts. The various authorities and actions pertaining to the Board of Directors are detailed in formal documents signed by both Directors of MPA Ltd.

- 7.7 For Terms of Reference for each Committee, please see the relevant Chair or Head of Academic Quality & Curriculum ([kchetwynd@mpacollege.co.uk](mailto:kchetwynd@mpacollege.co.uk)).

## 8. Data Strategy

- 8.1 MPA's intention for maintaining security of data reliance and validity seeks to support a robust approach to both data collection processes and reporting features across the College.
- 8.2 In order to obtain reliable data at every stage of the student journey, MPA introduced a new database system, College Management System (CMS) in 2017. Additional improvements and clarification to data collection processes include:
- 8.2.1 Initial Data / Personal Information:
- Online application forms automatically received and data inputted to the CMS (minimal information levels accepted to cover necessary recording of information for all courses/ activities)
  - Reservation forms introduced (with more data requests for enrolment purposes); added to the CMS
  - Enrolment forms pre-populated to obtain facilitate checking of data and identification of requests for any remaining missing data plus financial information
  - Registration day processes to confirm final checking of personal individual data (before formal reporting (HESA Student Records processing). This includes face-to-face ID confirmation and prior certification/ entry evidence to meet course requirements. Evidence uploaded to CMS electronically.
- 8.2.2 Assessment Data:
- CMS processes devised to support Tutor feedback recording and formative/ summative reporting for Student records
  - Manual checking and moderation processes designed to verify entries and reporting
  - Assessment results/ progression and achievement data are required to be recorded formally within 2 weeks of Exam Board/ Results meetings (to meet Awarding Partner regulations, UCA).
- 8.2.3 Recording and Storing Data - MPA operates a secure server for archived data and records; current data is held within the password protected, individualised access protected CMS.
- 8.2.4 Data is held for a minimum of 5 years.
- 8.3 MPA has worked to introduce Student and Graduate engagement strategies with data reliance across the College.
- 8.4 Terms of Enrolment stipulate the need for individual students to keep personal Student Records up-to-date and accurate at all times. Registry administrators facilitate this process formally at the start of every Academic year.

- 8.5 Graduates are supported to share achievements, destinations and future plans with student support and marketing staff at MPA. Final year students are required to sign terms to ensure contact details are shared and kept u-to-date in order to comply with DLHE/ Graduate Outcomes data capture.
- 8.6 Approval / version control processes – MPA operates a standardised approval process to ensure data reliance:
- External compliance reporting; three stage checking process (data collection/ reporting formats/ senior management staff oversight (with spot checking)
  - Personal data / student records are checked by individuals for accuracy minimum once per year
  - Assessment data records checked against academic and operational moderation activity.

## 9. Equality & Diversity Policy

### 9.1 Introduction

- 9.1.1 Millennium Performing Arts is opposed to any policy or practice which discriminates against an individual or group on grounds of sex, colour, creed, ethnic/national origins, sexual orientation, class, age, disability, marital status and those caring for dependants. We recognise that people who have been categorised in this way have suffered a long history of oppression and in particular, have experienced substantial discrimination within the sphere of employment.
- 9.1.2 In our admissions and application practices we will strive to eradicate such discrimination and will apply objective criteria to assess relevant abilities, avoiding judgments based on personal preference and prejudice. We aim to ensure that all applicants are considered on an equal basis, with equal opportunities to training and progression.
- 9.1.3 The very foundation of MPA guarantees an open and progressive approach towards equal opportunities. We are committed to equal opportunities and take complaints about discrimination seriously. We believe that all students and staff have the right to be treated with respect and dignity in an atmosphere free from threat or abuse. At MPA we promote positive attitudes to equality in treatment of all MPA students and staff. We aim to ensure that learners/ staff are truly representative of all sections of society and that every learner/staff member feels respected and able to give their best.

### 9.2 Definitions

- 9.2.1 It should be noted that MPA has adopted the following definitions:
- Diversity means recognising, valuing and taking account of people’s different backgrounds, knowledge, skills and experiences, and encouraging and using those differences to make the way we work and learn more creative, efficient and innovative.
  - Direct discrimination is treating a person less favourably than others due to their age, colour, creed, disability, marital status, race, religion, sexuality, social status etc.
  - Indirect discrimination is the applying of a requirement or condition, which, although applied equally to everyone, is such that a considerably smaller proportion of a particular group can comply with it and it cannot be justified.

- Harassment is described as inappropriate actions, behaviour, comments or physical contact that is objectionable or causes offence to the recipient. It may be directed towards people because of their gender, appearance, race, colour, ethnic origin, nationality, age, sexual preference, a disability or some other characteristic. Bullying is included in this category. Victimisation is defined as when someone is treated less favourably than others because he or she has taken action against MPA or provided information about discrimination, harassment or inappropriate behaviour.
- MPA regards discrimination, harassment or victimisation as serious misconduct and any employee or student who discriminates against, harasses or victimises any other person will be liable to appropriate disciplinary action. Where anyone working for or studying with, MPA feels that they are being harassed the details should be reported to the Directors.

### 9.3 **Operational Guidance**

#### 9.3.1 MPA strives to provide equality of treatment for all and will:

- Ensure no learner/staff member is discriminated against or receives less favourable treatment on the grounds of gender, gender re-assignment, age, marital status, race, ethnic origin, colour, nationality, disability, sexual orientation, religion or social status
- Promote acceptance of cultural and social diversity
- Challenge inequality and provide non-discriminatory access to our services and activities
- Utilise verbal and non-verbal communication that meets the principles of inclusion
- Employ and promote staff on the basis of skills, qualifications, experience, aptitude and abilities
- Distribute publicity materials which are free from stereotypes and discriminatory assumptions, images and language
- Ensure that every learner can learn in an environment that promotes dignity and respect to all
- Ensure that no form of intimidation, bullying or harassment is tolerated
- Ensure that practices and procedures are reviewed and amended to ensure fairness, with any breaches to this policy being dealt with appropriately
- Provide advice and guidance to staff and learners to ensure that equality of opportunity is demonstrated
- Ensure awareness is raised around issues of diversity
- Acknowledge any issues of discrimination that are brought to the attention of management ensuring they are investigated and rectified promptly and sensitively using an appropriate procedure.

#### 9.3.2 The effectiveness of this policy relies on all staff and students of MPA, being vigilant and reporting any instances where the policy is violated.

#### 9.4 **Reporting Procedure** - The procedure for this is detailed below:

- Learners/Staff who are aware of discrimination of any kind, or consider that they are being discriminated against, should in the first instance consider whether it may be appropriate to raise the issue informally with the alleged discriminator, who may not be aware that their behaviour is causing offence.
- Where it is not appropriate for an approach to be made to the alleged discriminator, or the learner/staff member is unwilling to do this, they should consider to whom they should

highlight their issue. In most cases it is envisaged this would be their HOD or HOY; alternatively this maybe the Senior Management Team or the Directors.

- The Staff member with whom the matter is raised should either investigate the concerns or refer the matter, wherever possible with the agreement of the person concerned, to a more appropriate staff member (Directors or Head of Academic Quality & Curriculum)
- Once the matter has been investigated the learner/staff member who has alleged discrimination should be informed of the action taken and, where appropriate, the outcome. It may not be appropriate to give details of any disciplinary sanctions applied
- Where learners/staff are not happy about the action taken they should appeal, within seven working days, to the Head of Academic Quality & Curriculum who should review or appoint an appropriate member of staff to review their concerns
- Appropriate disciplinary action will be taken against any employee, teacher, volunteer or learner who violates the MPA Equality & Diversity Policy. Any student or staff member may raise a grievance with no penalty for doing so, unless it is untrue and not made in good faith.

9.5 **Awareness and Commitment** - MPA ensure all staff and students are aware of the importance of our Equality and Diversity Policy at each course induction and through regular staff training days. Our Complaints Policy and Appeals Procedures also provides a structure for supporting all students and staff equally, including any reports of non-approved barriers to access of opportunity and equality of assessment.

9.6 MPA records information about the ethnic background, age, sex, religion, sexual orientation and disability of everyone who makes a complaint so that we promote and maintain our equal opportunities commitment. We will keep all information confidential. We welcome comments and suggestions that can help us improve our policy and procedure. The feedback we obtain will help us to continue to improve our policy/procedure.

## 10. Admissions Policy

**Revised July 2018 (due for review June 2019, KC/TQE)**

### 10.1 Introduction

10.1.1 As a popular and oversubscribed College, this admissions policy aims to meet the needs of as many young people as possible who wish to study at MPA whilst prioritising the needs of current students progressing internally. Applications from pupils attending other vocational training are welcomed but such applicants will only be enrolled on to courses if they meet necessary standards and there are vacancies after the needs of continuing students have been met.

10.1.2 Applicants must meet our requirements regarding application deadlines. That is, students must apply for audition in the year before entry (minimum) and must accept any offer of a place in writing within two weeks of the offer being made to them. Applicants who meet these deadlines will be guaranteed their place as offered by MPA. Applicants who do not respond to the offer of a place within this time scale will be sent a reminder providing them with a further chance to respond. If the applicant accepts the offer within two weeks, they will be guaranteed a place at MPA. If Applicants do not respond within two weeks, MPA will remove the applicant from the application process.

- 10.1.3 Applicants to MPA will be made aware of the required high standards including very high expectations of behaviour and attendance, dress code and professionalism. Further information can be supplied on request by prospective students or their parents.
- 10.1.4 Entry to MPA is via application and audition. We accept applications from students who meet the minimum entry requirements for each programme of study. All applicants need talent and potential as a performer, with a desire to learn and a passion to succeed. Students will need to be able to demonstrate an ability to sing and act, and have a good level of competency in dance. Students will be required to take part in Dance Classes and show pre-prepared materials as detailed in the audition information sheet.
- 10.1.5 Full details of our criteria for acceptance, marking scheme and audition procedures will be sent to students on receipt of a completed Application Form and the appropriate fee. At the audition, parents will be shown around MPA by current students and given a talk by the Directors as they outline the courses and facilitate discussion and questions as appropriate. Prospective students from minority groups should apply secure in the knowledge that MPA has a fully integrated Equality and Diversity Policy. Applicants with special requirements regarding access or special needs for auditioning should speak personally to the Auditions Secretary.

## 10.2 Procedure

- 10.2.1 Students makes an initial enquiry (telephone, online via our website or email)
- 10.2.2 Application form is made available to the applicant (on website to download, print and post back or sent out in post from Reception)
- 10.2.3 At this Application Stage, the applicant completes the form and returns this including the non-refundable audition fee and necessary supporting documents.
- 10.2.4 Once received, the application moves from the Reception administration team to the Auditions Secretary where relevant checks are carried out to ensure all relevant information has been completed and returned. Payments for non-refundable audition fees are passed to the Finance Department as appropriate.
- 10.2.5 Applicant details are added to the MPA CMS database at this point to initiate a Student Record.
- 10.2.6 The Applicant is emailed (or details send in post if necessary), offering the first available audition date and asked to confirm attendance. This initial email includes the Audition Day Timetable, some General Audition and Accompanying Information.
- 10.2.7 The Applicant then sends a Confirmation of Audition back to MPA or requests an alternative audition date (repeating process stages until data agreed).
- 10.2.8 At MPA, the Auditions Secretary prepares the following the day before audition:
- Allocation of numbers for all attendees
  - Lists of attendees and auditionee numbers for all Staff involved with the audition day

- Individual marking sheets for all attendees including Acting, Singing, Ballet, Contemporary & Jazz.
- 10.3 Following each audition day, the Auditions Secretary meets with staff to discuss outcome of each application. Each applicant and their suitability for this type of training is discussed. Each student is categorised depending on type of offer to be made and sent the relevant information for this offer (within two weeks of the date of the audition).
  - 10.4 In some cases, applicants must also participate in a short admission interview to ensure the applicant clearly understands the nature of the course and the commitment they are making and that any questions are addressed.
  - 10.5 Applicants are requested to send the income declaration (if appropriate) and registration form back within two weeks of the date of the email/received post, in order to provisionally accept their place and continue with the enrolment process, or decline their place at MPA (in this instance, MPA acknowledge the correspondence and no further action is required).
  - 10.6 Following receipt of the initial registration documentation, the Auditions Administrator prepares stage two, and sends enrolment information documents relevant to the course of study (to include Terms of Enrolment; Injury Declaration Form; Medical Form and relevant funding or finance request forms and information).
  - 10.7 These documents are sent to all students who have been offered a place at MPA. The Applicant completes and returns this paperwork to complete the enrolment process.
  - 10.8 Once all formal enrolment documents have been received as appropriate, the Student Induction letter is sent to all enrolled students. During the Summer holidays, a further welcome letter and the Student Handbook are sent detailing final information needed prior to their first day at MPA.
  - 10.9 **Provision for students with disabilities and specific learning needs**
    - 10.9.1 As part of its commitment, MPA believes that admissions processes should be as equitable as possible for all students. All applications from students who have disclosed a disability will be considered in the same way as any other application and a decision will be made that is based upon the individual's skills, talent, merit and potential.
    - 10.9.2 Applicants are encouraged to disclose a disability when they apply by completing the relevant section of their application form.
    - 10.9.3 Whilst the provisions of the Equality Act 2010 normally make it illegal to reject an application the grounds of disability there are three instances in which a University/College can reject a disabled applicant if they have the entry criteria necessary and these are:
      - overriding health and safety concerns;
      - barriers resulting from professional requirements;
      - necessary reasonable adjustments cannot be made.

- 10.9.4 Once the application form has been received, the applicant's requirements are considered and appropriate action is taken to ensure the applicant understands the support available. In some cases a meeting will be organised with the applicant to explore such requirements and how these may be met.
- 10.9.5 Following this meeting, support services will be put in place and reasonable adjustments made at MPA to address barriers which disabled students may encounter in the learning, teaching and assessment environment and which may affect performance.
- 10.10 **International student** applications are managed as above. Please contact our Admissions staff for any specific additional guidance or questions.
- 10.11 **Admissions Procedure Complaints** - MPA is committed to providing a fair and efficient admissions service and applicants will not be disadvantaged in any way because they have used this procedure. A complaint may express serious concern about any aspect of the admissions process; however applicants are reminded that they have no right of appeal against a decision not to offer them a place at the College.
- 10.12 Complaints against a decision may only be submitted on grounds of procedural irregularity or if there is new information which may have affected the decision (with reasons why it was not made available at the time of application), or if there is evidence of any action or decision which is not consistent with the Admissions Policy or Equal Opportunities Policy.
- 10.13 **Admission and return from withdrawal** - Should a student wish to return within two years of their permanent withdrawal, they must have written confirmation from the relevant Course Leader that they have been permitted to return. If a student's return is more than two years after their permanent withdrawal, they must re-apply.

## 11. Attendance Policy

To be approved, Sept. 2018.

## 12. Learner Safeguarding Policy

**Revised August 2018 (due for review August June 2019, SH/WC)**

- 12.1 **Introduction** - Everyone who participates in activities at Millennium Performing Arts (MPA) is entitled to do so in an enjoyable and safe environment. MPA has a moral and legal obligation to ensure that, when given responsibility for young people, all members of staff and volunteers provide them with the highest possible standard of care.
- 12.2 MPA aims to maintain an environment where staff, students and visitors feel included and welcome. This Policy outlines the steps taken to provide a safe learning environment at MPA, where everyone is expected to accept their responsibilities to safeguard learners from harm and abuse. This means following procedures to protect learners and report any concerns about their welfare to appropriate authorities. This Policy promotes good practice, providing learners with appropriate protection whilst in the care of MPA and

providing a framework for MPA to use to help prevent safeguarding issues from occurring in the first place, and for dealing with such an issue, in the unlikely event that one does arise.

12.3 MPA will support staff and students by providing relevant training and have, as a part of this policy provided a clear procedure for them to follow, should they have any safeguarding concerns. The lead member of staff institutionally responsible for the operation of this policy is the Designated Safeguarding Officer (DSO).

12.4 **Definition** - a person is considered to be in particular need for safeguarding, for the terms of this policy if they are a student or staff member who is or appears to be:

- dependent on others to help them perform basic physical functions;
- their ability to communicate with others is severely impaired;
- there is a potential danger that their will or moral well-being may be subverted or overpowered;
- they are a member, of an oppressed group;
- they are, for whatever reason unable to protect themselves against significant harm or exploitation.

12.5 **Responsibilities and scope** - we have a responsibility under the Safeguarding Vulnerable Groups Act (SGVA 2006) as amended by the Protection of Freedoms Act 2012 (PFA 2012) to ensure, as far as is reasonably possible, that vulnerable groups are protected from harm. We also have a responsibility to protect our staff, students and volunteers against harm or unfounded allegations.

12.6 To achieve this aim, MPA will identify those who may have particular safeguarding needs, with an aim of ensuring that there are appropriate measures in place to support and protect them. This is most likely to be when a prospective student or staff member presents at Interview, or where a tutor is made aware of or has their own concerns about a student, whom they feel would meet the definition of 'vulnerable' as outlined above.

12.7 In accordance with this Act, MPA is committed to ensuring the following:

- The welfare of the learner is paramount
- All learners, whatever their age, culture, ability, gender, language, racial origin, religious belief and/or sexual identity should be able to participate in performing arts in a secure and safe environment
- Taking all reasonable steps to protect learners from harm, discrimination and degrading treatment and to respect their rights, wishes and feelings
- All suspicions and allegations of poor practice or abuse will be taken seriously and responded to swiftly and appropriately
- All MPA employees who work with learners will be recruited with regard to their suitability for that responsibility, and will be provided with guidance and/or training in good practice and learner protection procedures
- Working in partnership with parents and learners, essential for the protection of learners
- The implementation of MPA procedures should be regularly monitored and reviewed. Relevant policies should be reviewed every 3 years or whenever there is a major change in the organisation or in relevant legislation.

12.8 Designated Persons with safeguarding responsibility are identified at MPA reception and on signage around the building. In 2018/19 these are: Donald McLennan (Director); Sarah Hanson (Principal); Cedric Chapelin (Vice Principal); - all trained and qualified with Child Protection for Designated Persons Course (Level 3). Donald McLennan (Director) and Sarah Hanson (Principal) have a certificate of attendance WRAP training 01/12/2015 and annual updates for 2016/17 and 2017/18.

12.9 Procedures for minimising, assessing, and responding to risk - MPA aims to have procedures in place to minimise risk and as a part of this, to establish a culture in which the rights of all people are fully respected and protected. We will:

- Have a DSO who can support staff to carry out a detailed risk assessment and use this to decide on a plan of action for supporting and safeguarding the individual and all those concerned with them
- Prevent unsuitable staff from joining the organisation through good recruitment and selection practice
- Ensure that all potential students are emotionally robust and mature enough and suitable to undertake training through thorough assessment and selection practice
- Support course eligibility and individual applications for Disabled Student Allowance
- Maintain confidential records of the medical conditions of our staff and students and always have a first aider on site during operating hours
- Ensure that staff and students are aware of the requirement to inform MPA if there are any changes to their circumstances which may affect their employment or place on a training course, e.g. a criminal conviction obtained once in post.

12.10 MPA will make all staff aware of the indicators of vulnerability and risk and the possible signs of abuse and equip them to respond quickly to concerns about actual, alleged, or suspected abuse and ensure that staff know how information about those with safeguarding needs should be handled and how to get support to access and manage risk (as guidance, MPA note that the following are regarded as poor practice and should be avoided by all personnel:

- unnecessarily spending excessive amounts of time alone with young people away from others
- taking young people alone in a car on journeys, however short (if a case arises where it is impractical/impossible to avoid a certain situation e.g. such as transporting a young person in your car, the tasks should only be carried out with the full understanding and consent of the parent/carer and the young person involved)
- taking young people to your home where they will be alone with you
- sharing a room with a young person
- engaging in rough, physical or sexually provocative games, including horseplay
- allowing or engaging in inappropriate touching of any form that is not part of teaching a dance/ singing/ acting class
- allowing young people to use inappropriate language unchallenged
- making sexually suggestive comments to a young person, even in fun
- reducing a young person to tears as a form of control
- allowing allegations made by a young person to go unchallenged, unrecorded or not acted upon
- doing anything of a personal nature that the young person can do for themselves)

- 12.11 If during your care you accidentally hurt a young person, the young person seems distressed in any manner, appears to be sexually aroused by your actions and/or if the young person misunderstands or misinterprets something you have done, report any such incidents as soon as possible to the designated person and make a written note of it.
- 12.12 If a risk is identified where it is felt by the person who first identified the risk, that more support is needed, they will in consultation with the DSO, complete a safeguarding Form.
- 12.13 The DSO, upon receiving the form will review it and where necessary arrange to carry out a risk assessment and use this to decide on a plan of action for supporting and safeguarding the individual and all those concerned with them. In most instances the DSO will include other relevant bodies to help determine the most appropriate course of action, e.g. the individual concerned, the Welfare Committee, the Board of Directors/ Senior Management Committee, and occasionally outside bodies, as appropriate. Where the concern relates to allegations of abuse involving a student or member of staff, or suspected terrorist activity, Senior Management will always be involved in the discussion.
- 12.14 **Safeguarding and risk assessment principles** - All activities will be carried out in accordance with the following good practice principles where possible:
- All staff and students must operate within an accepted ethical framework relevant to performing arts training and adhere to the high standards of MPA (as led by our values and mission statement)
  - It should be noted that it is not always easy to distinguish poor practice from abuse. It is therefore NOT the responsibility of employees or participants in performing arts to make judgments about whether or not abuse is taking place. It is however their responsibility to identify poor practice and possible abuse and act if they have concerns about the welfare of the learner
  - Any concerns to be reported to the DSO
  - Staff and students are encouraged to always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets)
  - All young people are to be treated equally and with respect and dignity; their welfare should always be put first
  - Staff are expected to maintain a safe and appropriate distance with students (e.g. it is not appropriate for staff to have an intimate relationship with a learner or to share a room with them)
  - Staff should avoid unnecessary physical contact with young people. Where any form of manual/physical support is required it should be provided openly. Physical contact can be appropriate so long as it is neither intrusive nor disturbing
  - Parental consent (where required) should be obtained if students are involved in a performance or activity that takes them outside the confines of MPA premises and transport in a car is required
  - Wherever students in mixed groups are taken away, they should always be accompanied by a male and female member of staff
  - Where possible, MPA will gain additional parental consent if the students are to take part in class photos or video recordings
  - Staff are required to be excellent role models for students; this includes not smoking or drinking alcohol in the company of young people

- Staff are encouraged to always give enthusiastic and constructive feedback rather than negative criticism
- MPA expects its staff to recognise the developmental needs and capacity of each young person and will not risk sacrifice welfare in a desire for personal achievements. This means avoiding excessive training or competition and not pushing them against their will
- Staff will keep a written record of any injury that occurs, along with details of any treatment given.

12.15 Risk assessment is a key tool to help MPA ensure that they meet safeguarding obligations towards both students and staff. It is also a means for helping to mitigate or remove potential risks that may prevent the maintenance of an inclusive environment. It may provide stimulus for MPA to consider alternative working practices too. All risk assessment will be carried out with the following principles in mind:

- Confidentiality – those identified as having safeguarding needs will know that information about them is managed appropriately, and there is a clear understanding of confidentiality and its limits among staff
- Participation– all those with safeguarding needs will be invited to participate, as far as is possible, in arriving at any decisions that involve them
- Dignity and respect – all those with safeguarding needs will be accorded the same respect and dignity as any other adult, by recognising their uniqueness and personal needs
- Equality and diversity – all those with safeguarding needs will be treated equally, and their background and culture will be valued and respected
- Independence – all vulnerable adults will have as much control as possible over their lives while being safeguarded against unreasonable risks
- Privacy – all those with safeguarding needs will be free from unnecessary intrusion into their affairs, and there will be a balance between the individual’s safety and the safety of others
- Support – all those with safeguarding needs will be supported to maximise their ability to engage in the courses, study activities, and training on offer.

12.16 **Defining learner abuse** - Learner abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm, it commonly occurs within a relationship of trust or responsibility and is an abuse of power or a breach of trust. Abuse can happen to a young person regardless of their age, gender, race or ability. Young people with disabilities may be at increased risk of abuse through various factors such as stereotyping, prejudice, discrimination, isolation and a powerlessness to protect themselves or adequately communicate that abuse had occurred.

12.17 There are four main types of abuse, physical abuse, sexual abuse, emotional abuse and neglect. The abuser may be a family member, someone the young person encounters in residential care or in the community, including sports and leisure activities. Any individual may abuse or neglect a young person directly, or may be responsible for abuse because they fail to prevent another person harming the young person. Abuse in all of its forms can affect a young person at any age. The effects can be so damaging that if not treated may follow the individual into adulthood. Types of Abuse include:

- Physical Abuse: where adults physically hurt or injure a young person e.g. hitting, shaking, throwing, poisoning, burning, biting, scalding, suffocating, and drowning. Giving young people alcohol or inappropriate drugs would also constitute young person abuse. This category of abuse can also include when a parent/carer reports non-existent symptoms or

illness deliberately causes ill health in a young person they are looking after. This is called Munchausen's syndrome by proxy. In a performing arts situation, physical abuse may occur when the nature and intensity of training disregard the capacity of the learner's immature and growing body.

- Emotional Abuse: the persistent emotional ill treatment of a young person, likely to cause severe and lasting adverse effects on the person's emotional development. It may involve telling a young person they are useless, worthless, unloved, and inadequate or valued in terms of only meeting the needs of another person. It may feature expectations of young people that are not appropriate to their age or development. It may cause a young person to be frightened or in danger by being constantly shouted at, threatened or taunted which may make the young person frightened or withdrawn. Emotional abuse in performing arts may occur when the young person is constantly criticised, given negative feedback, expected to perform at levels that are above their capability. Other forms of emotional abuse could take the form of name calling and bullying. Bullying may come from another young person or an adult. Bullying is defined as deliberate hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. There are three main types of bullying. It may be physical (e.g. Hitting, kicking, slapping), verbal (e.g. Racist or homophobic remarks, name calling, graffiti, threats, abusive text messages), emotional (e.g. Tormenting, ridiculing, humiliating, ignoring, isolating from the group), or sexual (e.g. Unwanted physical contact or abusive comments). In performing arts bullying may arise when a parent or teacher pushes the young person too hard to succeed, or someone from a different group uses bullying behaviour.
- Neglect occurs when an adult fails to meet the young person's basic physical and/or psychological needs, to an extent that is likely to result in serious impairment of the person's health or development. For example, failing to provide adequate food, shelter and clothing, failing to protect from physical harm or danger, or failing to ensure access to appropriate medical care or treatment. Neglect in performing arts could occur when a teacher does not keep the young person safe, or exposing them to undue cold/heat or unnecessary risk of injury.
- Sexual Abuse occurs when adults (male and female) use young people to meet their own sexual needs. This could include full sexual intercourse, masturbation, oral sex, anal intercourse and fondling. Showing young people pornography or talking to them in a sexually explicit manner are also forms of sexual abuse. In performing arts, activities which might involve physical contact with young people could potentially create situations where sexual abuse may go unnoticed, unless the teacher gives clear verbal instructions regarding situations where physical contact is involved. Also the power of the teacher over young students, if misused, may lead to abusive situations developing.

12.18 Indicators of Abuse - Even for those experienced in working with child abuse, it is not always easy to recognise a situation where abuse may occur or has already taken place. Most people are not experts in such recognition, but indications that a child is being abused may include one or more of the following:

- unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries
- an injury for which an explanation seems inconsistent
- the young person describes what appears to be an abusive act involving them
- another young person or adult expresses concern about the welfare of a young person
- unexplained changes in a young person's behaviour e.g. Becoming very upset, quiet, withdrawn or displaying sudden outbursts of temper

- inappropriate sexual awareness
- engaging in sexually explicit behaviour
- distrust of adult's, particularly those whom a close relationship would normally be expected
- difficulty in making friends
- being prevented from socialising with others
- displaying variations in eating patterns including over eating or loss of appetite
- losing weight for no apparent reason
- Becoming increasingly dirty or unkempt
- signs of bullying include behavioural changes such as reduced concentration and/or becoming withdrawn, clingy, depressed, tearful, emotionally up and down, reluctance to go training
- an unexplained drop off in performance
- physical signs such as stomach aches, headaches, difficulty in sleeping, bed wetting, scratching and bruising, damaged clothes, bingeing e.g. On food, alcohol or cigarettes
- a shortage of money or frequents loss of possessions
- Internet Bullying: This is a modern day phenomena and hard to detect as it happens outside of the school jurisdiction
- Drug Abuse: Usually hard to detect, however behavioural changes or sunken eyes can be the first example of the learner in this situation
- Flat Issues: Dealt with by Safeguarding Officers
- Sleep Issues: This could be detected by tutors if they see a learner obviously looking tired and weary
- Poor Attendance: This would be highlighted at the weekly staff meeting on student support
- Radicalisation: Staff were informed of the danger of students becoming radicalised in any form. Information placed in the staff-room i.e. Prevent Duty Guidance, MPA risk assessment in regard to radicalisation, Safeguarding information Guidelines for MPA Staff.

12.19 It must be recognised that the above list is not exhaustive, but also that the presence of one or more of the indications is not proof that abuse is taking place. It is NOT the responsibility of those working in MPA to decide that young person abuse is occurring. It IS their responsibility to act on any concerns. These concerns must be reported to the DSO.

## 12.20 **Responding to suspicions and allegations**

12.20.1 It is not the responsibility of anyone working at MPA to decide whether or not young person abuse has taken place. However there is a responsibility to act on any concerns through contact with the appropriate authorities so that they can then make inquiries and take necessary action to protect the young person. This applies BOTH to allegations/suspicions of abuse occurring within MPA and to allegations/suspicions that abuse is taking place elsewhere. This section explains how to respond to allegations/suspicions.

12.20.2 Receiving Evidence of Possible Abuse - we may become aware of possible abuse in various ways. We may see it happening, we may suspect it happening because of signs such as those listed in this document, it may be reported to us by someone else or directly by the young person affected.

12.20.3 In the last of these cases, it is particularly important to respond appropriately. If a young person says or indicates that they are being abused, you should:

- Stay calm so as not to frighten the young person
- Reassure the young person that they are not to blame and that it was right to tell
- Listen to the young person, showing that you are taking them seriously
- Keep questions to a minimum so that there is a clear and accurate understanding of what has been said. The law is very strict and young person abuse cases have been dismissed where it is felt that the young person has been led or words and ideas have been suggested during questioning. Only ask questions to clarify
- Inform the young person that you have to inform other people about what they have told you. Tell the young person this is to help stop the abuse continuing.
- Safety of the learner is paramount. If the learner needs urgent medical attention call an ambulance, inform the doctors of the concern and ensure they are made aware that this is a young person protection issue
- Record all information
- Report the incident to the Person in Charge, the designated person at MPA.
- In all cases if you are not sure what to do you can gain help from the NSPCC 24 hour helpline (Tel No: 0800 800 500). [help@nspcc.org.uk](mailto:help@nspcc.org.uk) ChildLine 08001111, Greenwich Children's Services 0208 854 8888 (out of hours ) 0208 921 3172 or [MASH-referrals@royalgreenwich.gov.uk](mailto:MASH-referrals@royalgreenwich.gov.uk) Anti-Terrorist Hotline 0800 789321.

12.21 **Recording information** - To ensure that information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern. In recording you should confine yourself to the facts and distinguish what is your personal knowledge and what others have told you. Do not include your own opinions. Information should include the following:

- The learners name, age and date of birth.
- Whether or not the person making the report is expressing their concern or someone else's
- The nature of the allegation, including dates, times and any other relevant information
- A description of any visible bruising or injury, location, size etc. Also any indirect signs, such as behavioural changes
- Details of witnesses to the incidents
- The learners account, if it can be given, of what has happened and how any bruising/injuries occur
- Has anyone else been consulted? Has anyone been alleged to be the abuser? Record detail.

12.22 Reporting the Concern - All suspicions and allegations MUST be reported appropriately. It is recognised that strong emotions can be aroused particularly in cases where sexual abuse is suspected or where there is misplaced loyalty to a colleague. It is important to understand these feelings but not allow them to interfere with your judgement about any action to take.

12.23 MPA expects its members and staff to discuss any concerns they may have about the welfare of a learner immediately with the DSO and subsequently to check that appropriate action has been taken. If the nominated Person in Charge is not available you should take responsibility and seek advice from the NSPCC helpline, the duty officer at your local social services department or the police. Telephone numbers can be found in your local directory.

12.24 Where there is a complaint against an employee or volunteer, there may be three types of investigation. Criminal in which case the police are immediately involved; Young

Person protection in which case the social services (and possibly) the police will be involved; Disciplinary or misconduct in which case MPA will be involved. As mentioned previously in this document MPA are not young person protection experts and it is not their responsibility to determine whether or not abuse has taken place. All suspicions and allegations must be shared with professional agencies that are responsible for young person protection. NB: If there is any doubt, you must report the incident: it may be just one of a series of other incidences which together cause concern.

- 12.25 Any suspicion that a learner has been abused by a member of staff or a volunteer should be reported to the designated person for safeguarding who will take appropriate steps to ensure the safety of the learner in question and any other learner who may be at risk. This will include the following: MPA will refer the matter to social services department; The parent/carer of the learner will be contacted as soon as possible following advice from the social services department ; The Directors should be notified to decide who will deal with any media inquiries and implement any immediate disciplinary proceedings; if the designated person for safeguarding is the subject of the suspicion/allegation the report must be made to the Directors who will refer the matter to social services
- 12.26 Allegations of abuse are sometimes made sometime after the event. Where such allegation is made, you should follow the same procedures and have the matter reported to social services. This is because other learners in performing arts or outside it may be at risk from the alleged abuser. Anyone who has a previous conviction for offences related to abuse against children is automatically excluded from working with children.
- 12.27 Confidentiality - Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only in line with Data Protection law.
- 12.28 **Internal inquiries and suspension** - The DSO will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further police and social services inquiries
- 12.28.1 Irrespective of the findings of the social services or police inquiries, MPA Directors and Management Team will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled. This may be a difficult decision; especially where there is insufficient evidence to uphold any action by the police. In such cases MPA Directors and the Management Team must reach a decision based upon the available information which could suggest that on the balance of probability, it is more likely than not that the allegation is true. The welfare of the learner should remain of paramount importance throughout.
- 12.29 **Recruiting and Selecting Personnel** - It is important that all reasonable steps are taken to prevent unsuitable people from working with learners. This applies equally to paid staff and volunteers. To ensure unsuitable people are prevented from working with learners the following steps should be taken when recruiting:
- Controlling Access to learners - All staff and volunteers should complete an interview. Consent should be obtained from the applicant to seek information from the relevant safeguarding register/authority , The designated person for safeguarding will seek

confidential references on applicants where necessary. Evidence of identity (passport or driving license with photo)

- Interview and Induction - All employees and volunteers will be required to undertake an interview carried out to acceptable protocol and recommendations.

12.30 **Training** - In addition to pre-selection checks, the safeguarding process includes training after recruitment to help staff and volunteers to:

- Analyse their own practice against what is deemed good practice, and to ensure their practice is likely to protect them from false allegations
- Recognise their responsibilities and report any concerns about suspected poor practice and/or abuse
- Respond to concerns expressed by a learner. Work safely and effectively with learners

12.31 MPA will also provide information to raise awareness to ensure that all staff understands what to do if a person covered by this policy is deemed to be at risk in some way.

12.32 **Additional specific considerations** - Use of Photographic/Filming Equipment in Performing Arts classes or in performance situations. There is evidence that some people have used performance situations as an opportunity to take inappropriate photographs or film footage of young people. All teachers should be vigilant and any concerns should be reported to the Person in Charge, the designated person at MPA.

### 13. External Speakers' Policy

**Reviewed February 2018 (due for review February 2019, KC/TQE & SH/WC)**

13.1 **Introduction & scope** - The Education Act 1986 imposes a duty on all educational establishments to ensure that freedom of speech is secured for all students and employees. As with all freedoms, free speech is a qualified privilege subject to the limits imposed by law including those governing the protection of national security; prevention of crime and the equality and discrimination and the protection of the rights and freedoms of others.

13.2 MPA will refuse to allow a workshop or event to go ahead, where it reasonably believes that it is likely to:

- incite hatred, violence or call for the breaking of the law;
- encourage, glorify or promote acts of terrorism;
- spread hatred and intolerance, including insulting other faiths or groups;
- promote, support or gather funds for an illegal group;
- promote views, which contravene those outlined in the MPA Equality & Diversity Policy.

13.3 **Procedure for staff and students** - In the event of a staff member or student wishing to invite an external speaker to speak at MPA, the following procedure must be followed:

- The Staff member or student will submit an external speaker request to the Principal, which will cover expected number of attendees and whether the event will be a member only, invitation only event or open to the general community;
- confirm any external speakers' affiliations (specifically where they are political or religious);

- declaration of any knowledge of controversy attracted by the speaker or topic in the past;
  - confirmation if the event and speaker are likely to attract media interest;
  - confirmation of web site details (where relevant) providing further information on the speaker
- 13.4 Any failure to disclose full speaker details may result in an event/booking being cancelled and could result in referral for disciplinary procedures.
- 13.5 On receipt of the information, the Principal will research all speakers on Google (after first looking at any web link provided). This information is then noted, including a link to the most relevant information about the speaker.
- 13.6 The Principal will refer any speakers that may require further exploration to the Directors (and the Welfare Committee).
- 13.7 Where an individual from outside MPA contacts a member of staff and asks to run a workshop they must notify the Principal who will liaise directly with the speaker following the procedures outlined in this policy.
- 13.8 **Assessing speakers** - Any speakers who are deemed to require further exploration, will be investigated by the Welfare Committee and the Principal who will conduct an investigation into the proposed booking.
- 13.9 In making recommendations they will assess risk on the following basis:
- The potential for any decision to limit freedom of speech vs. its potential to be in breach of MPA Equality & Diversity Policy
  - The duty placed on MPA under its Learner Safeguarding Policy and such acts as the Counter-Terrorism and Security Acts
  - The potential for MPA failing in its wider legal duties
  - The potential to cause reputational risk to MPA
  - The potential for speakers to cause fear or alarm to members of the staff and student body
  - The potential for the presence of external speakers on campus to give rise to a breach of the peace.
- 13.10 They may make one of the following recommendations:
- On the basis of the risks presented, to not permit the event with the external speaker to go ahead
  - On the basis of the risks presented, to fully permit the event with the external speaker to go ahead unrestricted
  - On the basis of the risks presented, to permit the event with the external speaker to go ahead on the basis of regulatory steps designed to reduce risk.
- 13.11 Regulatory steps designed to reduce risk may include:
- Requiring that the event is filmed by an independent body (provided notice is given in appropriate terms that this will be done)
  - Requiring that the event is observed by members of Senior Management
  - Requiring that an event promoting a particular view includes an opportunity to debate or challenge that view

- Requiring that a copy of any speech to be delivered by the speaker be submitted to the Principal/ Directors in advance.
- 13.12 When considering any regulatory steps designed to reduce risk, their potential to in and of themselves to cause risk should be taken into account. For example, the sense of oppression felt by the imposition of opening up the event to all MPA staff and students. The recommendation will be put to the Principal who will make a decision regarding whether the event is to go ahead or not. Where members of the Board of Directors disagree with the decision, they can call an emergency meeting in the usual way and/ or overrule the decision.
- 13.13 Where the person who proposed themselves, or the person who proposed the speaker in question disagrees with the decision made they shall have the right to appeal to the Board of Directors. Where the person who proposed themselves, or the person who proposed the speaker in question disagrees with the decision made they shall have the right to appeal to the Board of Directors. Where students or staff disagree with the decision made they shall have the right to submit a complaint in the usual way, a remedy to which shall be the option to consider the complaint an appeal as above.
- 13.14 Where MPA staff member is asked to speak at an outside event where it is likely that they could be sharing a platform with someone whose views may bring them into disrepute with the expectations of them as outlined in MPA's Equality and Diversity Policy, they must seek the advice of the Principal/ Head of Academic Quality for assistance to think through the implications and can raise a concern via the procedures outlined in the Learner Safeguarding Policy, where this is deemed necessary.
- 13.15 If the Principal and Head of Academic Quality & Curriculum, consider that a referred speaker needs to be reported to outside agencies, in the case for example, that it is deemed that their views are in breach of the law, the Principal and the DSO will, in consultation with the Board of Directors, decide when and how to do so. An annual report on referred speakers will be produced by the Principal/ DSO for the Board of Directors.

## **14. HEALTH & SAFETY POLICY**

**Revised December 2017 (due for review December 2018, CC/AC)**

- 14.1 INTRODUCTION - Our statement of general policy is:
- To provide adequate and appropriate control of the health and safety risks arising from our work activities
  - To consult with our staff on matters affecting their health and safety
  - To provide and maintain a safe working environment, safe equipment and safe working practices
  - To ensure safe handling and use of substances
  - To provide appropriate information, instruction, supervision for staff, students, sub-contractors and visitors.
- 14.2 Specific risk assessments will be undertaken in respect of works to be provided/carried out by subcontractors ensuring that competent method statements are obtained:

- To ensure all staff are competent to do their tasks, and to give them adequate training and support
- To prevent, as far as practicable, accidents and cases of work-related ill-health
- To maintain safe and healthy working conditions
- To review and revise this policy as necessary at regular intervals (annually)

14.3 SCOPE & TRAINING CONTEXT - MPA is an organisation that provides Performing Arts training of the highest standard for young people. The nature of the organisation is such that physical activities form a great part of the activities taking place in the building.

14.3.1 All staff and students are made aware of safe dance and training practices as part of their work/studies. The students also receive advice on issues relating to training and body maintenance ensuring that they are fully aware of how to conduct themselves in such a way that risks of injury or strain to them is minimised.

14.3.2 Further to this the organisation provides on –site treatment by a qualified physiotherapist, osteopath and counsellor. There is also a daily injury clinic that all students with injuries are required to attend, also any students with injuries are monitored closely and given advice on appropriate treatment and remedial action.

14.3.3 When enrolling, all students are required to take out a full private medical insurance.

14.3.4 Members of staff also have access to the on-site treatment opportunities and the well-being of staff is of great importance to the organisation.

14.3.5 The risk of injury or strain is inherent in the nature of dance training and practice and although there are resources in place to mitigate risks as far as possible, it is not possible, due to the nature of physical training, to fully do so. However, all students and staff are made aware of the risks involved in dance training and practice.

14.4 RESPONSIBILITY - Overall and final responsibility for health and safety is that of Director, Frederik Maas. Day-to-day responsibility for ensuring this policy is put into practice is delegated to the Vice-Principal / Building Manager, Cedric Chapelin.

14.5 To ensure health and safety standards are maintained and improved, the following people have specific responsibilities:

- Donald McLennan, lead Designated Safeguarding Officer
- Sarah Hanson, Head of Welfare; responsibility for student injury monitoring
- Cedric Chapelin, responsibility for assisting in building maintenance and management
- Karen Chetwynd, responsibility for policies and operational procedures.

14.6 All employees are required to:

- Co-operate with the Directors/ Senior Management Team and HOD's on health and safety matters
- Not interfere with anything provided, be that working practices, equipment or guidelines and rules given, to safeguard their health and safety
- Take reasonable care of their own health and safety and that of their students
- Report all health and safety concerns to an appropriate person.

- 14.7 All students are expected to conduct themselves with due regard to the health and safety both of themselves and others and to report any issues of concern to the appropriate staff member.
- 14.8 HEALTH AND SAFETY RISKS & RISK ASSESSMENT - Risk assessment is regularly overseen by the Directors and Vice Principal. The findings of the risk assessment have been reported to Frederik Maas who will approve actions to remove/control risks.
- 14.8.1 It remains the responsibility of the Building Manager to implement any required actions. The responsibility to check that the implemented actions have removed/reduced the risks lies with Frederik Maas.
- 14.8.2 Staff are consulted on a regular basis, on matters regarding their health and safety. In case there is an issue which does not arise during direct consultations, staff can bring the matter up with their representative who will then take the matter further. The Staff representative is Milla Kauhanen.
- 14.9 The Building Manager will be responsible for identifying all equipment or premises issues needing maintenance. The Building Manager will be responsible for ensuring effective maintenance procedures are drawn up. Frederik Maas will be responsible for ensuring that all identified maintenance is implemented. Any problems found with facilities and/or equipment should be reported to the Building Manager. The Building Manager will check that new equipment meets health and safety standards before it is purchased.
- 14.10 SAFE HANDLING AND USE OF SUBSTANCES
- 14.10.1 The Building Manager is responsible for identifying substances which need a COSHH assessment, for ensuring that all relevant staff are informed about COSHH assessments and that new substances can be used safely before purchased.
- 14.10.2 Assessments will be reviewed every 12 months or when work activities change, whichever is soonest.
- 14.11 INFORMATION, INSTRUCTION AND SUPERVISION
- 14.11.1 Health and safety poster/information is displayed by the main entrance outside reception. Health and safety advice is available in the staff room and from the Building and Events Manager.
- 14.11.2 Supervision of young staff/ trainees will be arranged by Frederik Maas.
- 14.11.3 Appropriate induction training will be provided for all staff by relevant Heads of Department or Senior staff.
- 14.11.4 All students will receive a briefing on Health & Safety issues at the commencement of their studies as part of their induction process.
- 14.11.5 Specific jobs requiring special training are cleaner, receptionist and Pilates instructors.

14.12 ACCIDENTS, FIRST AID AND WORK-RELATED ILL HEALTH

14.12.1 The first aid boxes are kept in reception on the ground floor and in the admin office on the first floor. The appointed persons/ first aiders are: Donald McLennan and Sarah Hanson. All accidents not relating to performing arts/ dance training are to be recorded in the accident book. The book is kept in reception.

14.13 MONITORING - To check our working conditions, and ensure our safe working practices are being followed, we will be continuously monitoring all activities taking place in the building, making sure that safe practices are met and at they are carried out according to health and safety regulations. We will also continuously monitor that the building and any equipment used meets health and safety regulations and does not cause any risk of injury or ill health to staff, students and visitors.

14.14 EMERGENCY PROCEDURES – FIRE AND EVACUATION

14.14.1 Donald McLennan is responsible for ensuring the fire risk assessment is undertaken and implemented. Escape routes are checked by the Fire Marshals every day.

14.14.2 Fire extinguishers are checked regularly, according to the Emergency Escape Plan, by the Fire Marshals and they are maintained by a qualified engineer regularly.

14.14.3 Alarms are tested every Monday morning at 9.30am by the Island Business Centre management, Marinos Myrmidonis. Emergency evacuation procedures will be tested at regular intervals.

**15. Data Protection Policy**

**Revised March 2018 (due for review May 2018 (re. GDPR); March 2019, KC & CC/AC & BOD)**

15.1 **Introduction**

15.1.1 Everyone has rights with regard to how their personal information is handled. During the course of our activities we will collect, store and process personal information about our students and staff, and we recognise the need to treat it in an appropriate and lawful manner.

15.1.2 This Policy is intended not to prevent the processing of personal data, but to ensure that it is done fairly and without adversely affecting the rights of the data subject.

15.1.3 The data subject must be told who the data controller is (in this case Millennium Performing Arts Limited), who the data controller's representative is (in this case The Directors), the purpose for which the data is to be processed and the identities of anyone to whom the data may be disclosed or transferred.

15.1.4 The information, which may be held on paper or on a computer or other media, is subject to certain legal safeguards specified in the Data Protection Act and other regulations. The Act imposes restrictions on how we may use that information.

15.1.5 MPA is registered under the Data Protection Act. The College is required to process relevant personal data regarding members of staff, volunteers, applicants, students, alumni and other stakeholders part of its operation and shall take all reasonable steps to do so in accordance with this Policy.

## 15.2 Responsibility

15.2.1 MPA's Data Protection Officer, who is the named contact with the Data Protection Commissioner, is Ikky Maas. The MPA Data Protection Officer will ensure that the MPA data protection notification is kept up to date (through delegation to the Head of Academic Quality / TQE Committee).

15.2.2 Senior Management and Registry / Admissions and Outreach staff endeavour to ensure that all personal data is processed in compliance with this Policy and the Principles of the Data Protection Act 1998. The Freedom of Information Act 2000 and the Protection of Freedoms Act 2012 are also relevant to parts of this policy. *N.B: The College recognises The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) adopted 27 April 2016, the two-year transition period and the application date of 25 May 2018 and is actively working towards compliance with that directive.*

15.2.3 The College shall so far as is reasonably practicable comply with the Data Protection Principles contained in the Data Protection Act to ensure all data is:

- Fairly and lawfully processed
- Processed for a lawful purpose
- Adequate, relevant and not excessive
- Accurate and where necessary up to date
- Not kept for longer than necessary
- Processed in accordance with the data subject's rights
- Protected appropriately
- Not transferred without adequate protection

## 15.3 Data collation

15.3.1 MPA manages Personal Data (which covers both facts and opinions about an individual where that data identifies an individual). Personal data may also include sensitive personal data as defined in the Act.

15.3.2 Consent may be required for the processing of personal data. Any information which falls under the definition of personal data and is not otherwise exempt, will remain confidential and will only be disclosed to third parties with appropriate consent.

15.3.3 Student consent to process their data and disclose it to parents is implicit when they reach the age of 18. If a pupil wishes to revoke or change consent they must agree a specific agreement on how their data is to be processed with MPA.

15.3.4 The College may, from time to time, be required to process sensitive personal data (protected characteristics). Sensitive personal data includes data relating to some medical information, gender, religion, race, sexual orientation and criminal records and proceedings.

- 15.3.5 Certain data is exempted from the provisions of the Data Protection Act. Contact MPA for further details as required.
- 15.3.6 The College will endeavour to ensure that all personal data held in relation to all data subjects is accurate. Data subjects must notify the College of any changes to information held about them. Data subjects have the right in some circumstances to request that inaccurate information about them is erased. This does not apply in all cases, for example, where records of mistakes or corrections are kept, or records which must be kept in the interests of all parties to which they apply.
- 15.3.7 If an individual believes that the College has not complied with this Policy or acted otherwise than in accordance with the Data Protection Act, the individual should utilise the College Complaints Policy.
- 15.3.8 The College must ensure that data processed by external processors, for example, service providers, Cloud services including storage, web sites etc. are compliant with this policy and the relevant legislation.
- 15.3.9 When data held in accordance with this policy is destroyed, it must be destroyed securely in accordance with best practice at the time of destruction. Please see MPA's Data Strategy for details relating to storage and retention timescales.
- 15.4 **Regulatory notices / Data Collection Notices** - Personal data may only be processed for the specific purposes notified to the data subject when the data was first collected or for any other purposes specifically permitted by the Act. This means that personal data must not be collected for one purpose and then used for another. If it becomes necessary to change the purpose for which the data is processed, the data subject must be informed of the new purpose before any processing occurs.
- 15.5 **Timely processing** - Personal data should not be kept longer than is necessary for the purpose. This means that data should be destroyed or erased from our systems when it is no longer required. For guidance on how long certain data is kept before being destroyed (1) student records, held for one year following graduation; (2) Staff records (including payroll) held for seven years after employment ends and (3) financial records, destroyed after seven years.
- 15.6 **Dealing with subject access requests** - a formal request from a data subject for information that we hold about them must be made in writing. A fee is payable by the data subject for provision of this information. Any member of staff who receives a written request should forward it to one of the Directors immediately. Data subjects have the right of access to information held by the College, subject to the provisions of the Data Protection Act 1998 and the Freedom of Information Act 2000. The College will endeavour to respond to written requests as soon as is reasonably practicable and in any event, within 40 days for access to records and 21 days to provide a reply to an access to information request. The information will be imparted to the data subject as soon as is reasonably possible after it has come to the College's attention and in compliance with the relevant Acts.

- 15.7 **Providing information over the telephone** - Any member of staff dealing with telephone enquiries should be careful about disclosing any personal information held by us. In particular they should:
- Check the caller's identity to make sure information is only given to a person entitled to it.
  - Suggest that the caller put their request in writing if they are not sure about the caller's identity and where their identity cannot be checked
  - Refer to one of the directors for assistance in difficult situations. No-one should be bullied into disclosing personal information.
- 15.8 Students and Staff are reminded that they should ensure that they are familiar with this Data Protection Policy. Any breach of the Policy, whether deliberate or through negligence, may lead to disciplinary action being taken, access to facilities being withdrawn or even a criminal prosecution.
- 15.9 **Notification of Data Held and Processed** - All staff, students, and other users are entitled to know (1) what personal information MPA holds and processes about them and why; (2) how to gain access to it; (3) how to keep it up to date; (4) what MPA is doing to comply with its obligations under the 1998 Act.
- 15.9.1 The data types of student information held about past, present and future students may include:
- personal information;
  - sensitive personal data;
  - assessment information;
  - financial information
- 15.9.2 The data types of staff information held include:
- personal information
  - sensitive personal data
  - work performance information
  - financial information
- 15.9.3 It is processed for the proper administration of the employment relationship both during and after employment.
- 15.10 The Data Protection Officer will, on receipt of a written request from an individual member of staff or student or other user, provide details of the information held about that individual and the reasons for which it is processed within the legal time requirement of 40 days from receipt of the written request. The request cannot be actioned unless the data subject provides adequate identification and adequate information to enable MPA to find the relevant data entries.
- 15.11 **Staff Guidelines for Data Protection** - Staff should ensure that they are familiar with this Data Protection Policy. Compliance with the 1998 Act is the responsibility of all members of MPA. Any breach of the Data Protection Policy, whether deliberate or through negligence, may lead to disciplinary action being taken, or access to College facilities being withdrawn, or even a criminal prosecution.
- 15.11.1 All staff are responsible for:

- checking that any information they provide in connection with their employment is accurate and up-to-date
- informing Registry staff of any changes to information, which they have provided. eg. changes of address;

15.11.2 Personal names, MPA telephone numbers, and email addresses of MPA staff involved in the teaching and administration of collaborative programmes will be shared with the relevant partner institutions on a need-to-know basis.

15.11.3 Staff whose work involves the management of student data must ensure they observe the eight data protection principles of the 1998 Act and comply with MPA's Data Protection policy and any amendments or supplementary guidance issued from time to time.

15.11.4 Staff whose work includes responsibility for supervision/ mentoring of students' academic work have a duty to ensure that students observe the eight principles of the 1998 Act and comply with MPA's Data Protection policy and any amendments or supplementary guidance issued from time to time.

15.11.5 The data will, therefore, be shared only within the EU (currently 27 countries), plus 3 EEA countries which have agreed to be bound by the EU Data Protection Directive (Norway, Liechtenstein, and Iceland) and also the following countries which have been judged by the EU to afford 'an adequate level of protection' of personal data (currently, Switzerland, Canada, Argentina, Guernsey, Jersey, Andorra, Faroe Islands, Israel and the Isle of Man).

15.11.6 All staff should ensure that any holding or processing of personal data is included in the MPA notification.

15.12 **Data Security** - All staff are responsible for ensuring that:

- Any personal data, which they hold, whether in electronic or paper format, is kept securely.
- Personal information is not disclosed deliberately or accidentally either orally or in writing to any unauthorised third party.
- Staff should note that unauthorised disclosure will usually be a disciplinary matter, and may be considered gross misconduct in some cases. It may also be a criminal matter in which the individual concerned could be held individually criminally liable as well as MPA.

15.13 **Incoming and Internal Mail:** Reception staff are (according to relevant oversight by Vice-Principal) the nominated processors for all post, both internal and external, sent to and within MPA. Save for the process of opening the post, there is no human intervention in the transmission of the data. The Reception staff member is obliged to comply with the Data Protection Act 1998 and the principles set out in this policy document.

15.14 **Student Guidelines for Data Protection** - Students should ensure that they are familiar with the Data Protection Policy. Compliance with the 1998 Act is the responsibility of all members of MPA. Any breach of the Data Protection Policy, whether deliberate or through negligence, may lead to disciplinary action being taken, or access to validating university facilities being withdrawn, or even a criminal prosecution.

15.14.1 MPA processes data relating to its students for a variety of purposes. These include but are not limited to:

- Maintenance of the student record (including personal and academic details) and management of academic processes (for example, academic audits, examination boards and awarding of degrees);
- Alumni operations;
- The provision of advice and support to students;
- Internal research, including monitoring quality and performance;
- MPA allows access to employees of MPA on a need-to-know basis only. Student information is disclosed to a variety of third parties or their agents, notably Students' sponsors (including, the Student Loans Company, etc);
- Relevant government departments to whom we have a statutory obligation to release information (including HEFCE/ OfS, the Higher Education Statistics Agency, UKBA and Council Tax officers).
- Current or potential employers of our students.
- Disclosures to organisations not listed above will be made in specific legitimate circumstances. Consent from the student will be sought where necessary and students will be informed of such disclosures unless exceptional circumstances apply.

15.14.2 Students are responsible for:

- Ensuring that all personal data provided to MPA is accurate and up to date.
- Informing Reception and/ or Registry staff of any changes to information which they have provided e.g. change of address.
- Informing MPA of any errors or changes.
- Students who, in the course of their programme of study, process personal data must do so in accordance with the provisions of the 1998 Act, MPA's Data Protection policy and any amendments or supplementary guidance issued from time to time.

15.14.3 Students who are undertaking research projects using personal data must ensure that:

- The research subject is informed of the nature of the research and consents to their personal information being used.
- Their Supervisor/ Mentor is informed and MPA is licensed to undertake this kind of research.
- All information is kept securely.

15.15 **Subject Consent to Processing Personal Information** - MPA may ask for information about a student's or an employee's health for use in the event of a medical emergency. MPA may also ask for information about an individual's criminal convictions, race and gender and marital status to ensure that MPA is a safe place for everyone and to enable MPA to operate policies like equal opportunities and to comply with legislation.

15.16 MPA, or its nominated document processor, processes personal/sensitive personal data with the consent of the individual. Because some information is considered sensitive, all staff and students are required to give Consent to Process regarding particular types of information. Offers of employment or course places may be withdrawn if an individual refuses to consent to this, without good reason. MPA also reserves the right to process data lawfully in accordance with the 1998 Act even where express consent has not been given.

15.17 **Publication of Information relating to Staff and Students of MPA** - It is the policy of MPA to make public as much information about the College as possible in any medium. This includes but is not limited to:

- Organisational structure showing roles of staff;
  - Members of committees;
  - List of key staff;
  - Photographs of key staff;
  - List of students to whom awards have been made or are likely to be made by the College.
- 15.18 Any individual having good reason for wishing details in these lists or categories to remain confidential should contact the Head of Academic Quality & Curriculum or the Directors. Information that is already in the public domain is exempt from the 1998 Act.
- 15.19 In accordance with the Freedom of Information Act, MPA will issue a Publication Scheme, and will make available on request MPA documents that give information about the structure, policies and operations of MPA. Reports, minutes and other similar documents made available under the Scheme will be amended so that statements and contributions made by staff and students are not attributed to identifiable individuals.
- 15.20 Care must be taken when capturing close-up images (including photos, videos, film) of staff or students, whether or not these individuals are named. Of key importance is the expectation of privacy on the part of those whose image it is proposed to capture. Consent to image capture is not required in the public spaces of MPA but is required where the expectation of privacy is greater (e.g. in formal teaching sessions)
- 15.21 **Rights to Access Information** - Staff, students and other users of MPA facilities have the right to access personal data that is being kept about them insofar as it falls within the scope of the 1998 Act. Any person who wishes to exercise this right should make their request, in writing, to the Directors. When making such a request, the individual must tell the Directors where they believe this information is held. MPA reserves the right to charge the recommended administrative fee on each occasion that access is requested. MPA aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within the statutory 40 days.
- 15.22 **Research Purposes Exemption** - Data collected fairly and lawfully for the purpose of one piece of research can be used for other research, providing that the final results of the research do not identify the individual. Such data must not be processed to support measures or decisions with direct consequences for the individuals concerned, or in a way, which is likely to cause substantial damage or distress to any data subject. Records of questionnaires and contacts may be kept, in order that the data can be revisited and/or re-analysed. This exemption is only applicable to research, and cannot be used to provide information about a particular individual.

## 16. Intellectual Property Rights Policy

**Revised August 2018 (due for review August 2019, KC/TQE)**

- 16.1 This policy is about Intellectual Property, the output created every day by staff and students. We understand that there are a number of different types of intellectual property; Patents, Domain Names Copyright, Performance Rights, Database Rights, Design Rights and Trademarks. MPA are primarily concerned with informing staff and students regarding Copyright and Performance Rights.

- 16.2 MPA recognises that Intellectual Property generated by research and work completed/undertaken at MPA is an important asset and MPA wishes to encourage all staff and students to contribute towards this activity. We aim to protect these assets for the benefit of staff, students and for MPA as a whole. MPA has the responsibility to identify, protect and manage its Intellectual Property effectively.
- 16.3 **Student Rights** - At enrolment, students sign and agree to MPA Terms & Conditions. This requires students to agree that MPA has ownership of Intellectual Property that they create during the period of, and relating to, their studies. For the avoidance of doubt, any Intellectual Property created by the student purely in a personal capacity and without use of MPA facilities and/or resources, will be owned by the student. This ensures that collaborative projects between students and staff can benefit from input, assistance and expertise from each other.
- 16.4 **Publication:** At MPA, students should obtain written consent from the Directors before entering into a contract with a publisher or producer of works and/or in relation to copyright in a work produced by the student but where the Intellectual Property belongs to MPA.
- 16.5 **Confidentiality:** Students should be aware of the importance of maintaining confidentiality in relation to Intellectual Property. Students are not authorised to enter into confidentiality agreements with third parties on behalf of MPA.
- 16.6 **Protection of Intellectual Property:** Students should ensure that all Intellectual Property is properly documented in a form that would enable the date of creation to be clearly established.
- 16.7 **Newspaper, Journal and Magazine articles and photos:** Most Newspaper, Journal and Magazine articles and photos will be the copyright of the publisher and its permission must be sought in advance. MPA may assist with advice and suitable acknowledgement wording.
- 16.8 **Use of MPA branding:** MPA's name and branding shall be used in all external activities as appropriate, in order to further the MPA reputation. Requests for the use of the MPA name and/or branding by third parties in endorsing research and products shall be referred to the Directors.
- 16.9 Students are reminded that a copy of this Policy is to be signed as Enrolment.

## 17. Information, Communications & Marketing Policy

**Approved November 2017 (due for review November 2018, CC/AC & BOD)**

- 17.1 **INTRODUCTION & SCOPE** - MPA has developed this Policy in accordance with the principles established by Part C of the Quality Code.
- 17.2 This Information Policy applies to all staff (i.e. full time, part time and/or part time staff without fixed working patterns) as well as other workers (including "temps", contractors and visiting lecturers) and students.

17.3 Specifically, this Information Policy aims to assure the accuracy, fairness, reasonableness and timeliness of:

- the MPA website
- the Prospectus
- marketing publications including, but not limited to, information published by MPA in course descriptors, advertisements, directory entries and external publications and/or websites
- social media publications including, but not limited to, information published by MPA on Facebook, Twitter and LinkedIn;
- Course, Student and Staff Handbooks and Induction guidance
- All Programme Specifications

#### 17.4 ROLES AND RESPONSIBILITIES

17.4.1 Directors Responsibilities: The Directors are in sole charge of all statements issued to the press/ media.

17.4.2 Vice-Principal's Responsibilities: The Vice-Principal is responsible for managing the operational aspects of delivering and maintaining the College Website, the Prospectus, all marketing and social media publications.

17.4.3 Principal's Responsibilities: The Principal is responsible for co-authoring the curriculum content and course materials and for ensuring that the material is accurate, fair, reasonable and timely.

17.4.4 Head of Academic Quality & Curriculum's Responsibilities: The Head of Academic Quality & Curriculum is responsible for ensuring that MPA public information is consistent and for ensuring that it meets all applicable statutory, regulatory, professional and contractual requirements. Additionally, the HOAQC is responsible for managing the operational aspects of delivering and maintaining the Student handbooks and all Programme Specifications and Course materials.

17.4.5 Individual Responsibilities: All Academic and support staff are responsible for assuring the accuracy, fairness, reasonableness and timeliness of MPA public information on a day-to-day basis and reporting any areas of concern to the Vice-Principal.

17.5 This Policy covers information published in either printed or electronic form which refers to academic programmes, services, strategy, policies and press and media communication; it does not, however, cover letters, emails, verbal communication, presentations, learning and teaching or curricular materials, staff recruitment advertisements or the outputs of performance/ workshop/ research activity.

17.6 The table below details responsibility for (1) authoring, (2) approving and (3) publishing information to each of the designated outlets.

17.7 First draft text should be submitted by the Author to the Approver at least three weeks in advance of the intended publication date (wherever possible)

17.8 Alterations, amendments and corrections should be notified by the Approver within one week of receipt, with edited copy to be returned to the Approver within one further week.

17.9 Final draft text will then be forwarded by the Approver to the Publisher no less than one week prior to the publication date.

<b>Outlet</b>	<b>Author</b>	<b>Approval</b>	<b>Publishing</b>	<b>Monitoring</b>
Press and Media	To be completed by the Marketing/ Admin Committee	BOD	CC	CC (Admin Committee, Marketing staff)
Website	To be completed by the Marketing/ Admin Committee	BOD	CC	CC (Admin Committee, Marketing staff)
Prospectus	To be completed by the Marketing/ Admin Committee	BOD	CC	CC (Admin Committee, Marketing staff)
Publicity	To be completed by the Marketing/ Admin Committee	BOD	CC	CC (Admin Committee, Marketing staff)
Social Media	To be completed by Marketing Staff	BOD	CC	CC (Admin Committee, Marketing staff)

### 18. IT, Email and Internet use Policy (staff & students)

**Revised December 2017 (due for review December 2018, CC/ Admin & BOD)**

18.1 INTRODUCTION - The purpose of this policy is to address both staff and student computer, email and internet usage and provide guidelines for proper use of the MPA's computer, email and internet facilities.

18.2 COMPUTER ACCESS & IMPLIED CONSENT - By using MPA's network and computer systems, staff and students provide their consent to having activity and accounts accessed, monitored, reviewed, recorded and stored without notice.

18.2.1 Computers provided by MPA are the property of MPA. Staff and Students should not assume emails are confidential even when a password is used to access the account or the term confidential appears in the subject line. MPA may access the computer network system and review communications within the system in order to maintain the system, investigate possible misuse, assure compliance with software copyright laws, comply with legal and regulatory requests for information, and other purpose deemed appropriate by MPA. Staff and Students should not expect the use of the MPA's electronic communications to be private. Staff and Students will not be given notice when MPA accesses electronic communications and are reminded that they should not share their

computer and passwords with anyone including students as this could allow non-employees to access the employer's sensitive information.

18.3 USE OF THE INTERNET - MPA provides full browsing access to the Internet for legitimate academic and business purposes; the internet is also available for limited personal use. Access to the Internet is monitored internally in the following ways:

- Downloads from websites are scanned for viruses
- And executable programme files; and
- Monitoring of size of files.

18.4 If downloads contain viruses or executable programmes or exceed a certain size the download will automatically be prevented and a warning message will appear on your screen.

18.5 If you are found to be in breach of any of the rules in this Policy you will have your Internet access removed.

18.6 Other than for legitimate academic purposes you must not use the Internet to access, view, download or distribute illegal or inappropriate material or material which may incur liability to MPA, including without limitation:

- Pornographic materials or other materials of a sexually explicit nature;
- Extremist or other terrorism-related materials;
- Material that may be viewed as offensive or degrading to others;
- Material that will incur a charge or other expense to MPA;
- Material which may create any criminal or civil liability to you, MPA or anyone else;
- Material containing executable programme files.

18.7 When a website is visited, devices such as cookies, tags or web beacons may be employed to enable the site owner to identify and monitor visitors. If the website is of a kind described in the paragraph above such a marker could be a source of embarrassment to MPA, especially if you have accessed, downloaded, stored or forwarded inappropriate material from the website. You may even be committing a criminal offence if, for example, the material is pornographic in nature.

18.8 You should also remember that text, music and other content on the internet are copyright works. You should not download or email such content to others unless certain that the owner of such works allows this.

18.9 The Internet is not a secure and confidential means of communication. In accessing sites you must not use confidential information of MPA or disclose your password or logon identification as this could be used to gain unauthorised access to the IT Systems.

18.10 Internet sites often contain documents and programmes that are infected by computer viruses. It is therefore imperative that you do not launch programs or documents directly from a web page

18.11 You must not download or use software on the IT Systems without the express consent of the Vice-Principal. Any breach of this rule renders the IT Systems vulnerable to

viruses and may make us and you liable for infringement of a third party's intellectual property rights.

18.12 Internal and External Emails - Other than for legitimate purposes, you must not transmit e-mails of the following nature:

- Abusive, aggressive or deliberately anti-social emails;
- Hoax virus alerts;
- Junk emails, chain letters and offers;
- Emails which could be construed as discrimination, racism or harassment;
- Emails of a defamatory nature;
- Emails misusing confidential or proprietary information;
- Emails in breach of copyright;
- Emails containing pornographic material;
- Emails containing material of a sexually explicit nature;
- Emails which are otherwise offensive or obscene;
- Emails containing extremist or terrorist-related material.

18.13 Limited reasonable personal use of the email system will be permitted. This should generally be done outside normal working hours and must not at any time interfere with MPA's business use. We reserve the right to withdraw this privilege if it is abused and/or take disciplinary action against you if you are found to be in breach of this rule.

18.14 Email is not an informal form of communication and what you write will be recorded in permanent form.

18.15 You must refer virus warnings to the Vice-Principal immediately.

18.16 Email accounts must be cleared regularly to prevent an excessive volume of messages building up in your email folders.

18.17 Staff are reminded that in the event that you are on annual leave or sick leave, you are responsible for ensuring that one or more of your colleagues has access to your incoming e-mails

18.18 Telephone System - Use of our telephone system, including facsimile functions, is primarily for business purposes only.

18.18.1 Reasonable limited personal use is permitted for local calls, provided this does not interfere with College use. If you are found to be abusing this facility you may be subject to disciplinary action.

18.18.2 Other than for academic and/or business purposes, long-distance or international personal calls are not permitted

18.19 Consequences of Breach of this Policy - If you breach or are suspected of breaching the rules and requirements of this policy, an investigation will be carried out and you may be subject to disciplinary action in accordance with our Disciplinary Procedures. Any sanctions that may be imposed on you will depend on the level of misconduct; however, a breach or repeated

breaches amounting to gross misconduct may result in you being suspended, expelled, dismissed, with or without notice.

## 19. Social Media Policy

This Policy is currently under consultation.

## 20. Staff Recruitment and Development Policy

This Policy is currently under review. Please see below for AY 2016/17 version.

### STAFF DEVELOPMENT POLICY

- 20.1 Introduction - MPA acknowledges that its staff are its most valuable resource, and it is committed to investment in their training and development.
- 20.2 The objectives of the policy are to enable staff to acquire the knowledge and skills to support them to perform effectively in their current roles; to enhance their performance in their current roles; support them to respond effectively to the demands placed upon them by internal and external change and development and develop their careers effectively at MPA.
- 20.3 In meeting these objectives, MPA seeks to apply the following principles:
  - All staff should have access to appropriate opportunities for initial professional development in their jobs, in accordance with MPA's equality and diversity policy
  - All staff should have access to appropriate opportunities for continuing professional development in their jobs, in accordance with their individual contracts of employment
  - The training and development opportunities provided should be relevant to the needs of staff for their employment at MPA
  - The training and development opportunities provided should be of appropriate quality.
- 20.4 Individuals are responsible for:
  - Reflecting at regular intervals upon their jobs and future career aspirations and identifying their needs for training and development.
  - Discussing these with their line manager with a view to establishing priorities.
  - Identifying appropriate opportunities for staff training and development.
  - Taking full advantage of such opportunities.
  - Applying newly-developed knowledge and skills to their work and to their careers.
- 20.5 Senior Management and the Directors are responsible for:
  - Ensuring that individuals have the opportunity at regular intervals to discuss their training and development needs.
  - Establishing priorities in relation to personal and institutional priorities and making appropriate provision to meet them within the resources available.
  - Regularly considering the development and training needs which will assist individuals or groups of staff to respond effectively to internal or external changes.

- In conjunction with staff, identifying appropriate opportunities for training and development.
- Where appropriate, approving attendance at relevant staff training and development activities and making appropriate provision for the release of staff from their duties.
- Ensuring equal opportunities in access to training and development is in accordance with MPA's Equal Opportunities Policy.

20.6 Heads of Department are responsible for:

- Identifying needs for training and development of staff arising from internal and external change by professional bodies and awarding partners.
- Providing appropriate training and development budgets.
- Liaising with Course Leaders to provide appropriate opportunities for staff training and development
- Liaising with staff to provide appropriate opportunities for staff training and development in response to internal and external change
- Ensuring that training and development opportunities are relevant to the needs of individual.
- Delivering, or arranging for the delivery of, appropriate training and development activities.
- Ensuring that such activities are conducted in accordance with MPA's policy on equal opportunities.
- Evaluating training and development activities in order to assure and enhance their quality

20.7 MPA is open and responsive to staff suggestions regarding individual and departmental staff development activity. For example, MPA has supported staff teams in initial teacher training courses and overseas conferences and performance.

20.8 All staff are encouraged to undertake first aid training, not only for their personal development but for the benefit of MPA, the students and their colleagues.

20.9 All support staff are eligible to attend external work-related and relevant workshops as part of their CPD.

20.10 Professionally qualified staff are also encouraged to maintain and improve their skills and knowledge by attending relevant continuous professional development workshops. Where specific in-house training and development activities are not available or appropriate, other solutions are explored e.g. external courses, coaching, mentoring, open learning etc.

20.11 Where possible, MPA will subsidise the cost of academic courses and/or provide study leave which will help to improve the opportunity for progression within the organisation.

20.12 All Academic staff are eligible to attend continuing professional development workshops provided by partner awarding bodies in accordance with MPA's individual contracts.

20.13 All Academic staff are encouraged to undertake research and publish their results in appropriate journals.

20.14 Where they are presented, all staff are required to submit Certificates of Attendance/Qualification to their line manager on completion of their workshop/course/ training.

20.15 STAFF REVIEW & APPRAISAL - PROCEDURE

- 20.16 This guide aims to provide staff with the opportunity to reflect on their performance, identify successes and identify the development objectives they may have. MPA recognises the need to develop all staff to allow them to meet their full potential and make a valued contribution to the institution as a whole. MPA's Staff Review and Appraisal scheme is a formal scheme designed to review performance and development needs on an annual basis enabling staff to develop their role in line with the aims of Metanoia Institute through the discussion, review and setting of clear, relevant and measurable objects in the short, medium and long term.
- 20.17 Review is not a stand-alone mechanism but should be part of a constructive feedback process and a key stage in the identification of staff learning and development needs.
- 20.18 When reviewing the learning and development needs of a member of staff it is important to remember that learning and development can be facilitated through a wide range of activities including on the job training/ shadowing/secondments/ mentoring/conferences for example, which may be appropriate to the needs of the member of staff, and MPA as a whole.
- 20.19 The Review & Appraisal Policy is not directly linked to procedures which determine pay or grading for which MPA has other identified processes which are discussed openly and transparently with staff at induction.
- 20.20 The outcome of appraisal will inform staff development at all levels within the College.
- 20.21 In its oversight of the appraisal system, MPA is committed to ensuring consistency of treatment and fairness and to stay within the prevailing legal framework applicable to all employers; for example, the Equality Act 2010, the Employment Rights Act 1996, the Part-Time Workers (Prevention of Less Favourable Treatment) Regulations 2000, the Fixed Term Employees Regulations 2002 and the Data Protection Act .
- 20.22 The appraisal process and the supporting documentation will be treated with strict confidentiality at all times. Only those who need access to such information will be granted access to enable them to discharge their responsibilities as directed by MPA.
- 20.23 The Directors/ Senior Management will monitor the operation of the appraisal system and review it at appropriate intervals via the TQE Committee.
- 20.24 This policy sets out the framework for a clear and consistent assessment of the overall performance of staff and for supporting their development needs within the College.
- 20.25 The Principal will be responsible for ensuring the review of the performance of every staff member in the College. The Directors will be responsible for the appraisal of senior management.
- 20.26 Appraisal meetings should be held during normal working hours and should be scheduled for at least 30 minutes or longer if necessary.

- 20.27 The purpose of the appraisal meeting is to review the staff members current role, their performance and their future plans. More specifically, the meeting will also be an opportunity to discuss how the staff member can contribute to the wider work of the College and to agree and set a number of objectives.
- 20.28 The Appraisal Period will be for 12 months from 1 September to 31<sup>st</sup> August. Mid-year review meetings may also be held if agreed and considered necessary.
- 20.29 Where a staff member starts their employment or transfers to a new post within the College part way through a cycle, managers will determine appraisal arrangements for the remainder of the appraisal period, with a view to bringing their cycle into line with the cycle for other staff as soon as possible.
- 20.30 Where a tutor is employed on a fixed term contract for a period less than 12 months, the length of the appraisal period will be determined by the duration of the contract.
- 20.31 The setting and agreement of objectives is fundamentally important to the effective operation of a performance management system. The job description can be a particularly useful place to begin the process of identifying relevant objectives for each individual job holder. However, the job description is just one 'reference document' that can be helpful context to the process of setting and agreeing objectives.
- 20.32 Objectives should be CSMART (C = Challenging; S = Specific; M = Measurable; A = Achievable; R = Relevant; T = Timed). Objectives should also be fair and equitable when judged across staff and their responsibilities. The objectives must be set such that they will contribute to the improvement of the College educational provision and performance and appraisers will therefore be expected to align individual objectives with MPA's priorities.
- 20.33 The purpose of the appraisal process at MPA is to develop staff and improve performance. It will facilitate a dialogue between managers and staff with a view to maintaining high standards and identifying where staff can develop their skills and effectiveness.
- 20.34 Please see appendix for template forms.

## **21. Conduct and Discipline Policy (Staff & Students)**

**Revised August 2018 (due for review August 2019, KC/TQE & BOD)**

21.1 **INTRODUCTION** - MPA adopts a management style which:

- Respects individuals and minimises hierarchy;
- Invites, whenever possible, those affected by decisions to participate in making them;
- Provides access to all information (except where it is confidential to an individual);
- Is clearly structured and reflects well-maintained boundaries;
- Encourages self-responsibility and the development of competence.

- 21.2 MPA's aim is to ensure that all staff and students are treated with respect and courtesy and, in return, treat with respect and courtesy other members of the MPA community (including their peers, other students, tutors, staff, the general public and anyone else within MPA). MPA staff and students are asked to be ambassadors for MPA, who are sensitive to our culturally diverse environment and profession.
- 21.3 This document is intended to provide fair and open procedures to maintain staff and student conduct and behaviour at MPA. These guidelines are made available to all staff and students during their time with MPA and it is the intention to allow this guide to encourage the development of mutual respect between staff and students. To this end it is important that both staff and students exercise their rights responsibly and with respect for others, and so contribute to the orderly running of MPA as a whole.
- 21.4 The aim of the Conduct and Discipline Policy is to set out the standards of conduct expected of all staff and students at MPA and to provide a framework within which managers and teaching staff can work with the student body and other staff to maintain those standards and encourage improvement where necessary.
- 21.5 It is MPA's policy to ensure that any disciplinary matter is dealt with fairly and in accordance with these guidelines. If you are in any doubt as to your responsibilities or the standards of conduct expected you should speak to the Principal or Vice-Principal.
- 21.6 **GENERAL NOTES ON CONDUCT AND DISCIPLINE - STUDENTS**
- 21.6.1 This Policy concerns the conduct and discipline of all members of the MPA community. Action taken under this Policy will supersede any action taken under any other rules relating to the conduct of those enrolled with MPA.
- 21.6.2 Students are accepted subject to their signed Terms, their Contract with MPA, as part of the enrolment process each year.
- 21.6.3 Students will observe all lawful regulations or directions in relation to their attendance and their studies which may be made or given by staff of MPA in order to support the effective organisation and management of the College; directives may be made or given by staff acting by authority of the Board of Directors (for example, regulations or directions in relation to safety, the use of the library, the use of facilities).
- 21.6.4 Students will inform MPA of their home address, telephone number and email address, and will inform them within seven days of any change to those details.
- 21.6.5 Students are expected to ensure that they understand and follow the MPA Code of Conduct. This includes observing all MPA policies, procedures and regulations which are notified to you from time to time by means of notice boards, e-mail, the website or otherwise; take reasonable care in respect of the health and safety; comply with all reasonable instructions given by staff and management; and act at all times in good faith and in our best interests and those of our students and other staff.
- 21.6.6 Failure to maintain satisfactory standards of conduct may result in action being taken under this Policy.

## 21.7 **GENERAL NOTES ON CONDUCT AND DISCIPLINE – STAFF**

21.7.1 Whilst working for MPA staff should at all times maintain professional and responsible standards of conduct. In particular Staff are required to observe the terms and conditions of agreed employment commitments, particularly with regard to dates/ hours of work as appropriate and issues of confidentiality.

21.7.2 Staff are expected to ensure that they understand and follow the MPA Code of Conduct. This includes: observing all MPA policies, procedures and regulations which are notified to you from time to time by means of notice boards, e-mail, the website or otherwise; take reasonable care in respect of the health and safety of colleagues and third parties; comply with all reasonable instructions given by HOD and management; and act at all times in good faith and in our best interests and those of our students and other staff.

21.7.3 Failure to maintain satisfactory standards of conduct may result in action being taken under this Policy.

## 21.8 **DEFINITION OF BEHAVIOURAL MISCONDUCT**

21.8.1 Please note, specific procedures exist already for dealing with the following matters (please see specific guidance and Academic Regulations documents for further information). These are:

- appeals against the decisions of the Assessment Board
- issues of academic misconduct;
- alleged harassment;
- alleged inequality of opportunity; and
- conduct which constitutes a criminal offence.

21.8.2 The following will constitute behavioral misconduct:

- Disruption of, or improper interference with, the academic, administrative, social or other activities of MPA, whether on College premises or elsewhere
- Obstruction of, or improper interference with, the functions, duties or activities of any staff or student of MPA or any contractor or visitor to MPA
- Violent, indecent, disorderly, threatening, obstructive, defamatory or offensive behaviour or language whilst on College premises or engaged in any MPA activity, taking account of attitude and context
- Fraud (or attempted), deceit, deception or dishonesty in relation to MPA or its staff or students or in connection with being a student of MPA
- Action which causes or is likely to cause injury or impair safety on MPA premises
- Breach of the provisions of MPA policies, as detailed in this Manual
- Damage to, or defacement of, College or associated property or the property of other members of the MPA community caused intentionally or recklessly or by negligence, and/or misappropriation of such property
- Misuse or unauthorised use of MPA premises or items of property, including misuse or unauthorised use of MPA IT-related infrastructure
- Behaviour which brings MPA (or relevant professions) into disrepute
- The deliberate false activation of a fire or panic alarm
- Minor breaches of our other policies (see Quality Manual)

- Minor breaches of your Terms of Enrollment / Terms of Employment;
- Damage to, or unauthorised use of, our property;
- Poor timekeeping/ Time wasting
- Refusal to follow instructions
- Excessive use of our telephones for personal calls/ excessive personal e-mail or internet usage
- Obscene language or other offensive behaviour
- Negligence in the performance of your duties
- Smoking in no-smoking areas.

21.8.3 This list is intended as a guide and is not exhaustive.

### 21.9 **MINOR MISCONDUCT**

21.9.1 Minor conduct issues can often be resolved informally between you and nominated senior management. These discussions should be held in private and without undue delay whenever there is cause for concern.

21.9.2 Where appropriate, a note of any such informal discussions may be placed on your personal records but will be ignored for the purposes of any future disciplinary hearings. In some cases an informal verbal warning may be given, which will not form part of your disciplinary records.

21.9.3 Formal steps will be taken under this procedure if the matter is not resolved, or if informal discussion is not appropriate (for example, because of the seriousness of the allegation).

21.9.4 You will not normally be dismissed for a first act of misconduct, unless we decide it amounts to gross misconduct.

21.9.5 If you have difficulty at any stage of the procedure because of a disability, you should discuss the situation with Senior Management.

### 21.10 **GROSS MISCONDUCT**

21.10.1 Gross misconduct is a serious breach of contract/ agreements which, in our opinion, is likely to prejudice our business or reputation or irreparably damage the working relationship and trust between us. Gross misconduct will normally lead to dismissal/ expulsion.

21.10.2 The following are examples of matters that are normally regarded as gross misconduct:

- Theft, or unauthorised removal of our property or the property of a colleague, contractor, customer or member of the public; or fraud, forgery or other dishonesty, including fabrication of expense claims and time sheets;
- Physical violence or bullying; or actual or threatened violence, or behaviour which provokes violence;
- Deliberate damage to our buildings, fittings, property or equipment, or the property of a colleague, peer, contractor or member of the public;
- Serious misuse of our property or name;
- Misuse or unauthorised use of MPA premises or items of property, including IT-related

infrastructure;

- Repeated or serious failure to obey instructions, or any other serious act of insubordination;
- Unlawful discrimination or harassment;
- Bringing the organisation into serious disrepute;
- Being under the influence of alcohol, illegal drugs or other substances during College / working hours;
- Causing loss, damage or injury through serious negligence;
- Serious or repeated breach of health and safety rules or serious misuse of safety equipment;
- Unauthorised use or disclosure of confidential information or failure to ensure that confidential information in your possession is kept secure;
- Accepting or offering a bribe or other secret payment.
- Possession, use, supply or attempted supply of illegal drugs;
- Serious neglect of duties, or a serious or deliberate breach of your contract/ terms or our operating procedures;
- Unauthorised use, processing or disclosure of personal data contrary to our Data Protection Policy; Giving false information as to qualifications or entitlement (including immigration status)
- Making a disclosure of false or misleading information under a Whistleblowing Policy or similar, maliciously, for personal gain, or otherwise in bad faith;
- Making untrue allegations in bad faith against a colleague/peer;
- Victimising a colleague/peer who has raised concerns, made a complaint or given evidence or information under another College policy;
- Unauthorised entry into an area of the premises to which access is prohibited

21.10.3 This list is intended as a guide and is not exhaustive.

## 21.11 **WARNINGS**

21.11.1 Where students or staff members engage in any activity which may constitute misconduct under this policy the following procedures will apply:

- Where issues concerning conduct and behaviour arise in the day to day running of the College, it is hoped that these issues will be resolved by the Head of the relevant Department
- A verbal warning may be issued by the Head of Department and the member/ student informed that a note regarding the fact that a verbal warning has been issued will be placed on their personal file
- Where issues concerning conduct and behaviour arise after a verbal warning has been issued, the issue should be drawn to the attention of the Principal who will issue a written warning. A note that a written warning has been issued will be placed on the individual's file
- Where issues concerning conduct and behaviour arise after a written warning has been issued, the issue should be drawn to the attention of the Principal and the student/ staff member informed that this will happen
- The Principal will convene a Conduct Panel consisting of the relevant Head of Department and two other members of Senior Management who will consider the gravity of the misconduct and will determine whether:
  - further action is necessary;
  - to issue a written warning;
  - to impose a charge in cases of damage or loss;
  - to deal with the individual concerned by setting up an appropriate disciplinary meeting, where the Head of Department will have authority to take any action listed

within this section. Should the student/ staff member fail, after reasonable notice, to attend such a hearing, the meeting may proceed to take any action listed within this section;

- to expel, exclude or suspend the member of staff / student.

21.11.2 The Conduct Panel will consider reported misconduct and determine whether to order the making good or restitution of damage or loss; and/or, expel, exclude or suspend the student.

21.11.3 Staff or Students who are the subject of a complaint of misconduct or against whom a criminal charge is pending or who is the subject of a police investigation may be suspended or excluded by the Management Team pending the relevant Hearing, Conduct Panel or trial

21.11.4 Accumulation of recorded warnings – MPA operates a warning points system. Where a staff member or student’s behaviour is being considered then warning points may be recorded according to the seriousness and nature of the behaviour. Offences, for the purpose of warnings, fall into different levels of seriousness classified on a four point scale: minor; serious; grave; suspension/expulsion.

21.11.5 A guide to the type of warning which might be issued is provided in the table below. It is expected that MPA will use their discretion and take into account the individual circumstances of each offence and vary the type of warning and/or penalty issued accordingly as required.

21.11.6 Where an individual accumulates four or more warning points within any period of 12 months (the period to start from the date of the first confirmed warning), then a Hearing/ Conduct Panel will consider the suspension or exclusion of the student. Before making a decision to suspend or expel a student, the Panel will consider the detail of the individual offences which have led to the accumulation of four or more warning points and will hear representations from the student.

21.11.7 **GUIDE TO WARNINGS LIKELY TO BE APPLIED** *(This is a guide only and serious cases of any behaviour may incur more serious action to that indicated.)*

<b>Warnings</b>	<b>Against property of MPA, staff, students/ candidates and visitors</b>	<b>Against the person</b>	<b>Against the work of MPA</b>	<b>Against the good name of MPA</b>
Minor Warning (1 Warning Point)	Negligent damage; Inconsiderate behaviour towards others.	Offensive language to other staff or students.	Disruption of the teaching/ learning environment through e.g. intoxication.	Offensive or disruptive behaviour affecting people adjacent to MPA’s premises.
Serious Warning (2 Warning Points)			Deliberate refusal to provide information required for statutory purposes	Knowingly making a false and vexatious allegation against MPA or against any student or staff member
Grave	Deliberate damage to property		Repeated disruption	Use/issue of fraudulent

Warning (3 Warning Points)	and goods; Deliberate false activation of a fire or panic alarm		of teaching	documentation NOT relating to qualifications / academic performance
Suspension/Expulsion (4 Warning Points)	Theft of MPA property, cash or goods, of the theft of property, cash or goods belonging to another; Fraud/attempted fraud; Deliberate misuse of MPA computer network, eg hacking; Deceit, deception or dishonesty which would bring MPA into disrepute.	Verbal or physical harassment or intimidation. Physical violence. Sexual assault; Deceit, deception or dishonesty which would bring a student, graduate, staff member or any other person engaged upon MPA business into disrepute.	Major disruption of academic programmes or the running of MPA. Serious plagiarism. Deceit, deception or dishonesty which would bring MPA into disrepute.	Sexual assault; Dealing drugs; Use/ issue of fraudulent documentation relating to qualifications/academic performance; Deceit, deception or dishonesty which would bring MPA or the related professions into disrepute.

### 21.12 CONFIDENTIALITY

21.12.1 Our aim is to deal with disciplinary matters sensitively and with due respect for the privacy of any individuals involved.

21.12.2 You, and anyone accompanying you (including witnesses), must not make electronic recordings of any meetings or hearings conducted under this procedure

21.12.3 You will normally be told the names of any witnesses whose evidence is relevant to disciplinary proceedings against you, unless we believe that a witness's identity should remain confidential.

### 21.13 INVESTIGATIONS

21.13.1 The purpose of an investigation is for us to establish a fair and balanced view of the facts relating to any disciplinary allegations against you, before deciding whether to proceed with a disciplinary hearing. The amount of investigation required will depend on the nature of the allegations and will vary from case to case. It may involve interviewing and taking statements from you and any witnesses, and/or reviewing relevant documents.

21.13.2 Investigative interviews are solely for the purpose of fact-finding and no decision on disciplinary action will be taken until after a disciplinary hearing has been held.

21.13.3 You do not normally have the right to bring a companion to an investigative interview. However, we may allow you to bring a companion if it helps you to overcome any disability, or any difficulty in understanding English.

21.13.4 You must co-operate fully and promptly in any investigation. This will include informing us of the names of any relevant witnesses, disclosing any relevant documents to us and attending investigative interviews if required.

## 21.14 **CRIMINAL CHARGES**

21.14.1 Where your conduct is the subject of a criminal investigation, charge or conviction we will investigate the facts before deciding whether to take formal disciplinary action.

21.14.2 We will not usually wait for the outcome of any prosecution before deciding what action, if any, to take. Where you are unable or have been advised not to attend a disciplinary hearing or say anything about a pending criminal matter, we may have to take a decision based on the available evidence.

21.14.3 A criminal investigation, charge or conviction relating to conduct outside work may be treated as a disciplinary matter if we consider that it is relevant to your employment/ College activities.

## 21.15 **OUTCOMES**

21.15.1 In some circumstances we may need to suspend you/ your studies. The suspension will be for no longer than is necessary to investigate the allegations and we will confirm the arrangements to you in writing.

21.15.2 'Suspension' normally refers to a total prohibition on attendance at or access to College and on any participation in activities unless you have been authorised to do so by the Board of Directors.

21.15.3 Suspension of this kind is not a disciplinary penalty and does not imply that any decision has already been made about the allegations.

21.15.4 'Exclusion' involves selective restriction on attendance at or access to the College or prohibition on exercising the functions or duties of any activity at MPA; the exact details will be specified in writing.

21.15.5 'Expulsion' involves the permanent withdrawal of the student from all activities concerned with MPA.

21.15.6 No individual will be suspended, excluded or expelled unless he or she has been given an opportunity to make representations in person. Where for any reason it appears to the relevant Hearing Panel that it has not been possible for the student to attend in person, he or she will be allowed to make written representations.

21.15.7 Where the case is judged to be one of great urgency a Director will be empowered to suspend or exclude an individual with immediate effect provided that opportunities above are subsequently given and the matter reviewed within five working days.

21.15.8 Suspension or exclusion will be reviewed in the light of any developments and of any representations made by the individual or anyone else on their behalf.

21.15.9 Any breach of an order of suspension or exclusion may lead to further disciplinary action.

## 21.16 **NOTIFICATION OF A HEARING**

21.16.1 Following any investigation, if we consider there are grounds for disciplinary action, you will be required to attend a disciplinary hearing. We will inform you in writing of the allegations against you, the basis for those allegations, and what the likely range of consequences will be if we decide after the hearing that the allegations are true. We will also include the following where appropriate:

- a summary of relevant information gathered during the investigation;
- a copy of any relevant documents which will be used at the disciplinary hearing;
- a copy of any relevant witness statements, except where a witness's identity is to be kept confidential, in which case we will give you as much information as possible while maintaining confidentiality.

21.16.2 We will give you written notice of the date, time and place of the disciplinary hearing. The hearing will be held as soon as reasonably practicable, but you will be given a reasonable amount of time, usually two to seven days, to prepare your case based on the information we have given you.

21.16.3 Further details will be provided to support this stage of the proceedings in all cases.

#### 21.17 **APPEALS AGAINST DISCIPLINARY ACTION**

21.17.1 If you feel that disciplinary action taken against you is wrong or unjust you should appeal in writing, stating your full grounds of appeal, to the Head of Academic Quality & Curriculum within one week of the date on which you were informed of the decision (but if suspended, you will remain suspended during the appeal process – please see full Appeals Policy).

21.17.2 If you are appealing against dismissal, the date on which dismissal takes effect will not be delayed pending the outcome of the appeal. If your appeal is successful however, you will be reinstated/ restart with no loss of continuity.

21.17.3 If you raise any new matters in your appeal, we may need to carry out further investigation. If any new information comes to light we will provide you with a summary including, where appropriate, copies of additional relevant documents and witness statements. You will have a reasonable opportunity to consider this information before the hearing.

21.17.4 We will give you written notice of the date, time and place of the appeal hearing. This will normally be two to seven days after you receive the written notice.

21.17.5 The appeal hearing may be a complete re-hearing of the matter or it may be a review of the fairness of the original decision in the light of the procedure that was followed and any new information that may have come to light. This will be at our discretion depending on the circumstances of your case. In any event the appeal will be dealt with as impartially as possible.

21.17.6 Where possible, the appeal hearing will be conducted impartially by the Head of Academic Quality & Curriculum. The Investigating Officer and a member of the Board of Directors/ Senior Management will also usually be present.

21.17.7 We may adjourn the appeal hearing if we need to carry out any further investigations in the light of any new points you have raised at the hearing. You will be given a reasonable opportunity to consider any new information obtained before the hearing is reconvened.

21.17.8 Following the appeal hearing we may:

- a) confirm the original decision;
- b) revoke the original decision; or
- c) substitute a different penalty.

21.17.9 We will inform you in writing of our final decision as soon as possible, usually within one week of the appeal hearing. Where possible we will also explain this to you in person. There will be no further right of appeal.

## **22. Peer Review Policy**

22.1 MPA is introducing a new initiative for the self and peer review of tutors and their tutoring practice. In as much as this might already exist within existing programs our understanding is this is informal and non-systematized. This initiative is to develop and implement a College wide process for a collaborative self and peer review of tutor practice, giving a softly structured, creative opportunity to critically reflect on current teaching practice and to develop possibilities for enhancement of this practice.

22.2 Given that all tutors are also members of departmental teams and are part of an overarching course we believe there are College wide implications to be considered as well as an individual's practice. For example, what are departments already doing to support and develop their tutors? Any peer review process should, therefore, include feedback to the Head of Department/ Course Leaders about what is needed at this level so that the onus for development and enhancement is not just an individual responsibility.

22.3 The collaborative peer review process is NOT part of a management observation scheme or any kind of performance review or staff appraisal. Equally, the process of self/peer review will be mandatory on a two yearly cycle. Course Leaders and Heads of Department have responsibility for setting the peer review process in motion and keeping a watching brief on its progress.

22.4 Please see Appendix for templates.

22.5 here are two necessary pieces to the peer review process (1) a reflective piece presented by the peer tutor being reviewed, sketching out the principles /values /ideas that inform their teaching practice an any areas they are seeking support in (2) Peer observation of teaching practice with reference to the above reflective piece.

22.6 The observation - The teacher facilitates the session as normal, having informed students in advance about the role of the observer. The observer watches both teacher and students, taking notes to capture observations, quotes and ideas.

22.7 Feedback or de-briefing - This is the key step in the reflective process and should enable the teacher to think critically about her/his practice through an interactive dialogue with the

observer. The conversation should focus on the original aims and aspects identified by the teacher but should also be informed by the observer's notes. The collegiality between them enables the teacher to explore personal actions and feelings, student reactions, ideas for change and plans for the future. It is important to keep the focus of the conversation on the teacher's reflective process.

- 22.8 The aim of this Policy is to contribute to the enhancement of good teaching practice by developing a culture of teaching observation for all academic staff.
- 22.9 The aim of teaching observation is developmental and outcomes should be discussed and agreed between observer and observee. The key objective of this process is to agree action and development that may be undertaken to enhance professional practice.
- 22.10 The purpose of peer observation is developmental and intended to enable lecturers to become better practitioners. Observation is expected to be beneficial to both for the observer and the observee and shall help to share good practice across MPA. The observation is non-judgemental, it is supportive, and it helps staff critically to reflect upon their teaching. It can result in staff trying out new ideas, reaffirming what is being done or modifying existing practices. Staff are encouraged to use peer observation to identify individual teaching related development needs and discuss these in their annual staff appraisal.
- 22.11 The observer shall contact the staff member to be observed and the observer and observee shall agree which session(s) shall be observed. They should agree what to observe e.g. type of teaching/learning session, type of student, full-time/part-time etc. The observation should ideally be an entire session but can be, for example, the first hour of a two-hour session, the staff involved should discuss the best scenario. The observer should also review the use of e-learning materials and formative assessment, where appropriate.
- 22.12 There should be a meeting (about ten minutes), preferably immediately prior to the observation, to discuss the learning objectives of the session and to give the observer any materials that the student shall receive (including the module handbook, where appropriate).

### **23. MALPRACTICE & MALADMINISTRATION POLICY**

- 23.1 MPA is committed to upholding the integrity of its courses, training and the qualifications it offers (in accordance with all Awarding Body policy/procedures). All policies and procedures are available to learners at induction and throughout their studies in handbooks and on request.
- 23.2 We are committed to ensuring that all learners undertaking a course of study have equal opportunities to demonstrate their abilities. Accordingly, MPA will not tolerate any act or omission, or attempted act or omission, that is or results in cheating, unfair practice or a breach of rules and regulations. Learners found to have committed any of the above will, at our/ the Awarding Bodies discretion, be disqualified from examinations/assessments.
- 23.3 The purpose of this policy is to:

- define malpractice and maladministration;
- set out the rights and responsibilities of MPA and our learners in relation to such matters; and
- describe the procedures to be followed in cases where there is reason to suspect malpractice or maladministration.

23.4 Definitions of Malpractice and Maladministration - Malpractice means any act or omission, or attempted act or omission, which:

- breaches the awarding bodies rules and regulations for its exams;
- compromises the process of assessment, the integrity of any qualification or the validity of a result or certificate;
- prejudices or otherwise damages the authority, reputation or credibility of the relevant awarding body as an independent exam board or damages the authority, reputation or credibility of MPA or its staff.

23.5 Malpractice can arise from a variety of reasons. It can be intentional, done with the aim of giving a candidate an unfair advantage in an exam or assessment. It can be unintentional or negligent, arising through ignorance, carelessness or forgetfulness about necessary rules and regulations. It can also arise through circumstances beyond the control of those involved, such as where disruption is caused to an exam by an external event or unplanned incident. Maladministration is a type of malpractice committed by a centre relating to the delivery of units and qualifications and/or administration of exams. Maladministration is usually unintentional and arises from mistake, ignorance, carelessness or forgetfulness about the necessary rules and regulations for exams.

23.6 Irrespective of the underlying causes of the malpractice or maladministration, or the people involved, all allegations of malpractice or maladministration in relation to Awarding Body exams and assessments need to be investigated by the relevant Awarding Body in order to protect the integrity of its qualifications and to be fair to all candidates and centres.

23.7 Candidate Malpractice means malpractice by a learner in the course of any assessment, including in the compilation of portfolios, the writing of any exam paper, and in oral and practical exams. Examples of learner behaviour which would be the subject of an investigation into malpractice are set out below. This is not an exhaustive list and as such does not limit the scope of the definitions set out in this policy:

- Behaving in such a way that enables the learner to gain an unfair advantage
- Altering official documentation such as exam report forms, individual marksheets and certificates
- Impersonating a candidate
- Failing to adhere to recommended security procedures as identified by the Awarding Body
- Providing a false form of identification
- Plagiarising texts from another source including the internet
- Cheating or attempting to cheat by copying another's work or allowing another learner to copy his/her work
- Colluding or attempting to collude with other learners
- Talking to, giving anything to or distracting another learner during the exam
- Being in possession of and/or using unauthorised aids such as notes or electronic devices in the exam room
- Obtaining or attempting to obtain confidential exam material (prior to and/or during the exam)

- Failing to comply with guidance for Reasonable Adjustments considerations
- Disseminating confidential exam material to others
- Making an audio or video recording of an exam (e.g. on a mobile phone)
- Attempting to influence the examiner's assessment by offering incentives of any kind or by using threatening behaviour before, during or after the exam session
- Attempting to influence the invigilator or other centre staff by offering incentives of any kind or by using threatening behaviour before, during or after the exam session
- In external or internal assessments, failure to apply the relevant Awarding Body recommended invigilation procedures
- Removing any materials other than the learners personal possessions from the exam room
- Using unauthorised photocopies (e.g. of exam scripts) in an exam.

22.8 Centre Malpractice - 'Centre malpractice' means malpractice committed by a member of staff at MPA. Examples of centre behaviour which would be the subject of an investigation into malpractice are set out below. This is not an exhaustive list and as such does not limit the scope of the definitions set out in this policy:

- Altering official documentation such as exam report forms, individual marksheets and certificates
- Attempting to influence the examiner's assessment by offering incentives of any kind or by using threatening behaviour before, during or after the exam session
- Attempting to influence others involved in the delivery of the exams
- Removing confidential exam material or retaining copies of such
- Disseminating confidential exam material
- Failing to keep exam papers secure before an exam session
- Tampering with learners papers or allowing learners to tamper with papers before or after the exam
- Assisting learners during exams by interpreting questions or providing answers
- Enabling learners to have access to forbidden material in the exam room
- Enabling learners to communicate during exam sessions
- Making an audio or video recording of an exam
- Allowing the impersonation of a learner
- Providing false supporting documentation, e.g. a false course attendance letter

22.9 Centre Maladministration - Examples of centre behaviour which constitute maladministration are set out below. This is not an exhaustive list and as such does not limit the scope of definitions set out in this policy:

- Not issuing full instructions to learners before the start of the exam
- Failing to provide the learners with sufficient information to complete the details on the question paper or answer sheet
- Failing to start the exam on time
- Not announcing and/or displaying the start and finish time for each exam
- Having no working clock visible in the exam room or having a clock at the back of the room behind students (not visible without turning round)
- Allowing learners to leave the room within the last 15 minutes of the exam
- Not checking that learners have completed their details
- Failing to remind learners of the time remaining in the exam
- Not carrying out ID checks as required by the Awarding Body
- Opening the security bag prior to entering the exam room or opening it in an incorrect manner (e.g. by pulling the bag apart in a way that suggests it has been tampered with)

- Failing to allocate the correct time for an exam or conducting the exam at a time different from the authorised time
- Seating learners too closely together or so that they are facing each other
- Learners being left unsupervised during the exam or the invigilator(s) not giving full attention to invigilating
- Allowing learners to leave the room unsupervised during an exam or between consecutive exams
- Allowing persons other than the invigilator or learners into the exam room during the exam
- Not completing the exam documentation accurately.

#### Reporting Suspected Malpractice and Maladministration

Cases of suspected malpractice and maladministration may be reported by a number of sources, such as:

- By the centre, e.g. in a report from the invigilator
- By the learner, e.g. in a letter to the Awarding Body
- By an assessor or Internal Verifier or External Examiner.

22.10 Investigation Procedure for Suspected Malpractice and Maladministration - MPA will notify the relevant Awarding Body of any incidents of malpractice/ maladministration as required. We will assist with all requests for information and co-operate fully with those investigations. Following this procedure, MPA will implement any actions during or after the investigation in accordance with recommendations.

22.11 Conflict of Interest - To avoid any potential conflict of interest, MPA will always consider course staffing decisions (tutors, assessors and Quality Assurance staff) carefully to ensure that we continue to provide a balanced, robust, quality service for our learners. We uphold fair assessment through the use of independent assessors and regular Quality Assurance communication. If MPA staff wish to gain qualifications through our provision, appropriate independent staff will be used to complete and quality assure the assessment process.

## **23 Academic Appeals Policy**

**Revised July 2018 (due for review July 2019, KC/TQE)**

### 23.1 Context and Scope

23.1.1 Students studying with MPA have the right to appeal against any disciplinary action brought against them and also to make a complaint about any aspect of their training. This policy also provides support for Students wishing to make an appeal against an assessment decision.

Students can appeal against an assessment decision relating to:

- The mark for an individual item of course work
- The final result of any element of assessment
- The result or outcome of any external assessment or moderation
- The final overall internal and/or external assessment decision for a qualification.

23.1.2 Please note: All Students are assessed against agreed and published Awarding Organisation criteria. Assessment decisions are made by assessors who are trained, experienced and/or appropriately qualified

23.2 It is the responsibility of the Student to notify the assessment staff of any medical problem which may affect performance adversely in the assessment process, so that a decision can be made for deferral, prior to the assessment date.

23.3 Confidentiality - All Appeals will be treated impartially and will not impact in any way on future assessment decisions on individual cases. The appeal process will be handled on a confidential basis.

23.4 Students are strongly encouraged however, to pursue any issue or grievance through informal channels, before following the formal procedures. Students should note that there are time limits for lodging appeals. Students are reminded that assessment is a matter of judgment and disagreement with an assessment judgment is not grounds for appeal. The Student should draw attention to any problems at the earliest opportunity, seek advice and take corrective action.

23.5 The grounds for appeal generally fall into one of following main types:

- The assessment was not conducted in accordance with the qualification and/or Awarding Body regulations
- Medical or other extenuating circumstances arose during the assessment process which affected the Student's performance
- There was inappropriate or irregular behaviour on the part of the Assessor
- Administrative or procedural error

23.6 Where the outcome of an appeal brings into question the accuracy of results for other students, MPA will take steps to protect the interests of all students.

23.7 Stages of the Appeals process - Stage 1 - The Student should firstly discuss the reason for the appeal with the Assessor or Moderator (if possible) on the day of the assessment. If this does not resolve the appeal the Student should complete the Appeal Form (available from Head of Academic Quality & Curriculum) and submit to the Principal within 5 days from the date of the assessment, including any supporting evidence. The Principal will investigate the appeal and respond in writing within 7 working days

23.8 Stage 2 - If the Student feels that the outcome is unsatisfactory they should complete the relevant section of the Appeal Form and re-submit to the Directors. MPA will notify the External Examiner and relevant Awarding Body at this stage. If the External Examiner was not present or is unable to resolve the appeal issue, the Student will be directed to the third stage of the appeals process.

23.9 Stage 3 - The Student should complete a written appeal directly to the Awarding Body (details in relevant course handbook).

23.10 The Awarding Body and/or the External Examiner will investigate the matter thoroughly and respond in writing within 21 working days.

23.11 If the Student feels that the External Examiner and Awarding Body have been unable to bring the matter to a satisfactory conclusion, the appeal may be escalated in accordance with the relevant Awarding Body procedure (and the OIA).

23.12 Stage 4 - The Student may be offered a formal appeals hearing depending on the circumstances of the appeal. This will be conducted within 6 weeks and may have nominal fees attached. The fee will be refunded if the appeal is upheld. Full written details will be provided at this stage.

23.13 Additional Notes: It is extremely difficult to investigate appeals without impartial evidence. Therefore appeals against referrals in practical assessments based solely on the Student's disagreement with the assessor's decision will only be considered when accompanied by a video recording. The Student has the right to video any aspect of their assessment using their own video recording equipment provided it does not interfere with the assessment process, other Students or the assessor's ability to carry out their role(s). In such instances, it is the responsibility of the Student to arrange a video operator.

23.14 An academic appeal is a request from a student for a reconsideration of a decision made by an Assessment Board regarding his/her assessment, progression or award. It relates to the outcome of an assessment or examination, or a student's progression, and may be based on:

- Extenuating or mitigating circumstances where, for good reason, the Assessment Board was not made aware of a significant factor relating to the assessment of a student when it made its original decision and/or;
- A material error, either in the conduct of the assessment itself, or in the proceedings of the Assessment Board, which significantly affected the Assessment Board's decision or;
- A penalty imposed for academic misconduct.

23.15 Successful appeal results in the Assessment Board reviewing its decision in the light of the new information initially provided by the student, although it does not necessarily mean that the original decision of the Assessment Board is changed. An appeal may only be made against a published assessment result which has been confirmed by an Assessment Board.

23.16 The principles and timescales outlined in these regulations will also apply to a group of students. Staff responsible for the management of the appeal will ensure that all members of the group are in agreement as to the nature of the appeal. Individual issues would normally be dealt with separately. With the agreement of the group, staff will respond to and liaise with a spokesperson. The outcome of the appeal will be communicated to all members of the group.

23.17 Students who have a complaint or grievance concerning the provision of a programme of study or academic service which they believe has affected the quality of their academic performance, should, before submitting an appeal, follow the Complaints Policy procedures. Explanatory notes and guidance for making a Complaint are available in the Quality Manual.

23.18 In most cases, students are advised to make every effort to discuss any problems with an appropriate member of the academic staff before submitting a formal appeal/ complaint. This may result in the matter being resolved informally and quickly.

23.19 Please note: there is a time limit of 28 calendar days from the date of the Assessment Board results being published for submission of a formal appeal to the Academic Board.

23.20 Learners studying with MPA have the right to appeal against any disciplinary action brought against them and also to make a complaint about any aspect of their training. This policy also provides support for learners wishing to make an appeal against an assessment decision.

Learners can appeal against an assessment decision relating to: the mark for an individual item of coursework e.g. worksheets/assignments and case studies; the final result of any element of assessment e.g. planning, teaching and/or evaluation; the external assessment (theory paper); the final overall internal/external assessment decision for a qualification.

23.21 All learners are assessed against agreed and published Awarding Body criteria. Assessment decisions are made by assessors who are trained, experienced and/or qualified.

23.22 All appeals will be treated impartially and will not impact in any way on future assessment decisions on individual cases. The appeal process will be handled on a confidential basis. Learners are strongly encouraged, however to pursue any complaint or grievance through informal channels, before following the formal procedures. Learners should note that there are strict time limits for lodging appeals. Learners are reminded that assessment is a matter of judgement and disagreement with an assessment judgement is not grounds for appeal. The learner should draw attention to any problems at the earliest opportunity, seek advice and take corrective action.

23.23 The grounds for appeal generally fall into one of following main types:

- The assessment was not conducted in accordance with the qualification and/or Centre/Provider regulations
- Medical or other extenuating circumstances arose during the assessment process which affected the learner's performance
- There was inappropriate or irregular behaviour on the part of the assessor
- Administrative or procedural error
- Where the outcome of an appeal brings into question the accuracy of results for other students, MPA will take steps to protect the interests of all students.

23.24 Stage 1 - The learner should firstly discuss the reason for the appeal with the assessor or internal verifier (if possible) on the day of the assessment. If this does not resolve the appeal the learner should complete the Learner Appeal Form (available from the Directors) and submit to the internal verifier within 5 days from the date of the assessment – include any supporting evidence. The internal verifier will investigate the appeal and respond in writing within 7 working days

23.25 Stage 2 - If the Learner feels that the outcome is unsatisfactory they should complete the relevant section of the Learner Appeal Form and re-submit to the internal verifier. The Centre will then notify the External Examiner. If the External Examiner was not present or is unable to resolve the appeal issue, the Learner will be directed to the third stage of the appeals process.

23.26 Stage 3 - The learner should complete a written appeal directly to Awarding Body. The External Examiner will investigate the matter thoroughly and respond in writing within 21 working days. If the learner feels that the External Examiner has been unable to bring the matter to a satisfactory conclusion, the appeal may be referred directly to the Director of Awarding at the relevant Awarding Body.

23.27 Stage 4 -The learner may be offered a formal appeals hearing. This will be conducted within 6 weeks and will be conducted by the appeals panel. Provision of an appeals hearing will incur a nominal fee. The fee will be refunded if the appeal is upheld.

23.28 Additional Notes - It is extremely difficult to investigate appeals without impartial evidence. Therefore appeals against referrals in practical teaching based solely on the learner's

disagreement with the assessor's decision will only be considered when accompanied by a video recording. The learner has the right to video any aspect of their assessment using their own video recording equipment provided it does not interfere with the assessment process, other learners or the assessor's ability to carry out their role(s). It is the responsibility of the learner to arrange a video operator. It is the responsibility of the learner to notify the centre where their assessment is taking place of any medical problem which may affect student performance adversely in the assessment process, so that a decision can be made for deferral, prior to the assessment date.

- 23.29 Appeals against referrals in the external theory result can result in the following action: Investigation into the centre's invigilation procedures/delivery; Hand marking of the theory papers; Investigation into the content of the theory paper by the Awarding Body.

## 24 Complaints Policy

**Revised July 2017; reviewed 2018 (due for annual review July 2019, KC/TQE)**

- 24.4 MPA is proud of its staff, faculty and quality of teaching. If students however, do have a complaint, they can expect it to be treated by MPA in accordance with this Procedure
- 24.5 Stage 1 - Informal Resolution - it is hoped that most complaints and concerns will be resolved quickly and informally.
- 24.6 If you have an issue that you wish to raise in relation to your classes/training please do so promptly, in the first instance, with your tutor. In many cases, the matter will be resolved straightaway to the learners' satisfaction. If the tutor cannot resolve the matter alone, it may be necessary for him/her to consult MPA management.
- 24.7 Complaints made directly to MPA will usually be referred to the relevant tutor unless MPA management deem it appropriate for them to deal with the matter personally.
- 24.8 The tutor will make a written record of all concerns and complaints and the date on which they were received. Should the matter not be resolved within one month, or in the event that the tutor and student fail to reach a satisfactory resolution, learners will be advised to proceed with their complaint in accordance with stage 2 of this Procedure.
- 24.9 **Please note: For complaints of an academic nature, relating to HE provision at MPA, please consult the HE study handbook for UCA complaints procedures.**
- 24.10 Stage 2 - Formal Resolution - If the complaint cannot be resolved on an informal basis, then parents/learner should put the complaint in writing to Principal. The Principal will decide, after considering the complaint, the appropriate course of action.
- 24.11 In most cases, the Principal will meet or speak to the parents/student concerned, normally within two weeks of receiving the complaint, to discuss the matter. If possible, a resolution will be reached at this stage.
- 24.12 It may be necessary for the Principal to carry out further investigations. The Principal will keep written records of all meetings and interviews held in relation to the complaint.

- 24.13 Once the Principal is satisfied that, so far as is practicable, all of the relevant facts have been established, a decision will be made and parents/learners will be informed of decision in writing. The Principal will also give reasons for his/her decision.
- 24.14 If learners prefer they can request a formal interview with the relevant Head of Department to discuss the issue. This meeting will be minuted. The Head of Department may request the presence of one of the directors at the meeting. The Head of Department will write to confirm the result of this meeting. If parents/students are still not satisfied with the decision, they should proceed to Stage 3 of this Procedure.
- 24.15 Stage 3 - Panel Hearing - If students seek to invoke Stage 3 (following a failure to reach an earlier resolution) they will be referred to MPA management/the Directors. Any communications at this stage would be best in writing and must in any case set out the reason for your dissatisfaction with the Head of Department's action in relation to your grievance.
- 24.16 The matter will then be referred to a panel consisting of the management and an independent person with appropriate background and experience. MPA will then acknowledge the complaint and schedule a hearing to take place as soon as practicable and normally within 14 days. Depending on the nature of the complaint, it may be necessary to involve the relevant Awarding Organisation at this stage. If the Panel deems it necessary, it may require that further particulars of the complaint or any related matter be supplied in advance of the hearing. Copies of such particulars shall be supplied to all parties not later than three working days prior to the hearing. The student may be accompanied to the hearing by one other person. This may be a relative, teacher or friend. Legal representation will not normally be appropriate.
- 24.17 If possible, the Panel will resolve the complaint immediately without the need for further investigation. Where further investigation is required, the Panel will decide how it should be carried out which may include referral to the relevant Awarding Organisations procedures (see relevant Complaints Procedures for further guidance). After due consideration of all the facts, the Panel will reach a decision and may make recommendations, which it shall complete within 14 days of the hearing. The Panel will write to the student informing them of its decision and the reasons for it. The decision of the Panel will be final. The Panel's findings and, if any, recommendations will be sent in writing to the student, MPA and, where relevant, the person/s involved in the complaint
- 24.18 The Directors will, if necessary, seek independent advice before reaching a decision on how your grievance should be resolved. Their response will be final. Please note: Any grievance against any of the Directors will be dealt with by the company's lawyers, including any appeal. Their response will be final.
- 24.19 You do have the right at any juncture to appoint a representative. Any involvement of a representative will mean your grievance may be dealt with by the company's lawyers.
- 24.20 Learners can be assured that all concerns and complaints will be treated seriously and confidentially.
- 24.21 MPA is proud of its staff, faculty and quality of teaching. If students however, do have a complaint, they can expect it to be treated by MPA in accordance with this Procedure

- 24.22 Stage 1 - Informal Resolution. It is hoped that most complaints and concerns will be resolved quickly and informally. For complaints of an academic nature, relating to HE provision at MPA, please consult the HE study handbook for UCA complaints procedures to be used once the internal mechanisms at MPA have been exhausted.
- 24.23 Stage 2 - Formal Resolution. If the complaint cannot be resolved on an informal basis, then parents/learner should put the complaint in writing to Principal. The Principal will decide, after considering the complaint, the appropriate course of action.
- 24.24 Stage 3 - Panel Hearing. If students seek to invoke Stage 3 (following a failure to reach an earlier resolution) they will be referred to MPA management/the Directors. Any communications at this stage would be best in writing and must in any case set out the reason for your continued dissatisfaction.
- 24.25 Learners can be assured that all concerns and complaints will be treated seriously and confidentially.
- 24.26 **Introduction** - MPA's complaints policy and procedure is designed for situations where a student/candidate/applicant is dissatisfied with the decisions and/or actions of the College, or its staff, in relation to programme content and/or delivery, learning and teaching, administrative policies, procedures and processes and/or the conduct of a member or members of staff.
- 24.27 This is different from an academic appeal (which covers assessment issues).
- 24.28 Our Complaints Policy seeks to provide guidance for individual students regarding the processes involved in submitting a complaint to MPA. You may also find it helpful to refer to the Student Complaints flowchart for an overview of the procedure (APPENDIX). The Policy can be found on the website, referenced in the Academic Regulations and in the Quality and Standards Manual.
- 24.29 Students are reminded that if problems arise, all parties are encouraged to try to resolve these as soon as possible. We are committed to learning from complaints, and to identifying enhancements to the overall student experience wherever possible. Complainants can be assured that all concerns and complaints will be treated seriously and confidentially. If a student wishes to make a complaint they should be assured that making a complaint will not influence their progress, studies or their learning, teaching or training experience
- 24.30 Admissions Procedure Complaints - MPA is committed to providing a fair and efficient admissions service and applicants will not be disadvantaged in any way because they have used this procedure.
- 24.31 A complaint may express serious concern about any aspect of the admissions process; however applicants are reminded that they have no right of appeal against a decision not to offer them a place at MPA. Complaints against a decision may only be submitted on grounds of procedural irregularity or if there is new information which may have affected the decision (with reasons why it was not made available at the time of application), or if there is evidence of any action or decision which is not consistent with the Admissions Policy or Equal Opportunities Policy.
- 24.32 **Informal Resolution: Stage 1**

24.32.1 In most cases, we expect and aim to resolve problems at an early opportunity and in the simplest way. The process we use is described by Early Resolution. Although this stage is informal we would recommend that you keep your own record of the key events, times, and people involved, both in relation to your complaint and, the steps taken to try and resolve it. We will also keep these records.

24.32.2 Steps to follow:

24.32.3 In the first instance if possible, you should discuss your complaint as soon as possible, directly with the person concerned. Alternatively you may wish to speak to your Head of Year or the Head of Welfare. In both cases Registry will be informed and keep an administrative record of communications (all Staff are asked to alert Registry of informal complaints for recording purposes)

24.32.4 Students are advised that if the matter cannot be resolved in this informal way detailed above, you can also contact the relevant Course Leader who will make notes about your complaint and speak with the member of staff concerned, keeping Registry informed of communications

24.32.5 Should you wish to notify MPA of your complaint, you are asked to inform Registry staff directly within 28 days of the event to which it relates (or, if it relates to a series of events, within 28 days of the last event in the series).

24.32.6 Where appropriate, and agreed by the parties involved, a mediation meeting will be set up to discuss the complaint and to see if it is possible to resolve it at this stage. This would be coordinated by Registry and the Head of Academic Quality & Curriculum.

### **24.33 Formal Complaint: Stage)**

**24.33.1** In the event that the process detailed above does not lead to a resolution, or if the complainant wishes to pursue the matter formally in the first instance, then the following procedure will apply; this allows for further and more structured investigation.

**24.33.2** Steps to follow:

**24.33.3** The complainant makes a preliminary submission to Registry for the Head of Academic Quality & Curriculum outlining a summary of the complaint within 10 working days of the meeting where the grievance could not be resolved.

**24.33.4** In order for a complaint to be considered at Stage 2, we ask that you use the Student Complaints Form (see Appendix), submitted directly to Registry. The purpose of the form is to help focus on the key areas of the complaint and on what you would like to happen. It also gives us a clear, formal record of the complaint.

**24.33.5** The Head of Academic Quality & Curriculum will investigate the complaint within 10 working days of the submission.

**24.33.6** More extensive details of the complaint may be sought from the complainant. These will then be forwarded to the person complained against for a response, who has 10 working days to respond to the complaint.

**24.33.7** The documentation will then be considered by the Head of Academic Quality & Curriculum. Please note that at this stage, materials are only made available to the parties themselves, the Head of Academic Quality & Curriculum and the relevant Course Leader for further consultation. If further clarification is required to confirm/ establish any facts or claims, the Head of Academic Quality & Curriculum will endeavour to acquire such additional information from either of the parties; this may involve a short interview with the parties concerned, at which they may be accompanied by another individual of their choosing (but excluding legal practitioners).

**24.33.8** After 15 working days following the consideration of all available information the Head of Academic Quality & Curriculum will make one the following decisions, (i) Complaint dismissed; (ii) Complaint upheld; (iii) Complaint partially upheld.

**24.33.9** The Head of Academic Quality & Curriculum is responsible for ensuring that the conditions are met within the agreed time frame.

### **24.34 Formal Appeal: Stage 3**

**24.34.1** In the event that the complainant is not satisfied, they may lodge a formal appeal for a further review of the complaint. If you are not satisfied with the outcome of the Stage 2 response you are able to request a further review of the complaint.

**24.34.2** Steps to follow:

- In order for a complaint to be considered at Stage 3, we ask that you complete the Student Complaints Form (see Appendix) and submit directly to the Head of Academic Quality & Curriculum. The purpose of the form is to help focus on the key areas of the complaint and responses that need further investigation. It also gives us a clear, formal record of the complaint and identifies any specific remedies the complainant is seeking.
- This request must be received by the Head of Academic Quality & Curriculum within 10 working days of receiving the outcome at Stage 2.
- The Head of Academic Quality & Curriculum will then appoint a Senior member of staff from the Management Team / Directors, not previously involved with the case, to convene a panel with a member of staff from the Teaching and Quality Enhancement (TQE) Committee to investigate the complaint within 20 working days of the submission.
- The documentation will then be forwarded to the Senior member of staff from the Management Team / Directors. Please note that at this stage, materials are only made available to the parties themselves and to appointed Senior staff and staff member from the Teaching and Quality Enhancement (TQE) Committee.
- The appointed staff will review all of the submitted materials and may decide conduct a hearing to which all relevant parties would be invited to give verbal statements. Questions may be posed to the complainant and the complained against by relevant Staff and / or the complainant. All parties may be accompanied to the hearing by another individual of their choosing (but excluding legal practitioners).
- After 15 working days following the consideration of all available information the appointed Senior staff member will make one the following decisions: (i) Complaint dismissed; (ii) Complaint upheld; (iii) Complaint partially upheld.
- The Senior staff member and nominated TQE staff member will submit a joint report in writing to the Head of Academic Quality & Curriculum who will inform the parties of the

outcome. Where a complaint is upheld with a number of conditions the reports should stipulate a timescale in which the issues that have been identified should be addressed.

- The Senior staff member and the Head of Academic Quality & Curriculum are both responsible for ensuring that the conditions are met within the agreed time frame.
- Once the Institute's internal procedures have been concluded a Completion of Procedures (CoP) letter will be issued.
- Please note that there is a separate process for handling Student Appeals relating to Academic issues, assessment, progression or awarding concerns.

#### **24.35 External Oversight (Stage 4)**

**24.35.1** In the event that the complainant is still not satisfied, they may lodge an external appeal with the Office of the Independent Adjudicator within three months of receiving notification that MPA's internal procedures have been completed.

**24.35.2** At this point, a student who is dissatisfied with the final decision concerning his/her case may be able to apply to the Office of the Independent Adjudicator for Higher Education (OIA) for a review of the case. Information and eligibility rules are available at: [www.oiahe.org.uk](http://www.oiahe.org.uk) or you can write to: Office of the Independent Adjudicator for Higher Education, Third floor, Kings Reach, 38-50 Kings Road, Reading, RG1 3AA, United Kingdom enclosing a copy of the final decision of MPA and stating the reasons for seeking redress from the OIAHE.

### **25 ANTI-CORRUPTION & BRIBERY POLICY**

25.4 It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

25.5 We will uphold all laws relevant to countering bribery and corruption. However, we remain bound by the laws of the UK, including the Bribery Act 2010, in respect of our conduct both at home and abroad.

25.6 The purpose of this policy is to: set out our responsibilities, and of those working for us, in observing and upholding our position on bribery and corruption; and provide information and guidance to those working for us on how to recognise and deal with bribery and corruption issues.

25.7 Bribery and corruption are punishable for individuals by up to ten years' imprisonment and if we are found to have taken part in corruption we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

25.8 In this policy, "third party" means any individual or organisation you come into contact with during the course of your work for us, and includes actual and potential students, clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

25.9 Who is covered by the policy? This policy applies to all individuals working at all levels and grades, including officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, homeworkers, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiary or their employees, wherever located (collectively referred to as "workers" in this policy).

25.10 What is bribery? A bribe is an inducement or reward offered, promised or provided in order to gain any commercial, contractual, regulatory or personal advantage. Examples: Offering a bribe - You offer a potential client tickets to a major sporting event, but only if they agree to do business with us. This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential client to accept your offer. Receiving a bribe - A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them. It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage. Bribing a foreign official - You arrange for the business to pay an additional payment to a foreign official to speed up an administrative process. The offence of bribing a foreign public official has been committed as soon as the offer is made. This is because it is made to gain a business advantage for us. We may also be found to have committed an offence.

25.11 Gifts and hospitality - This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. The giving or receipt of gifts is not prohibited, if the following requirements are met:

- it is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- it complies with local law;
- it is given in our name, not in your name;
- it does not include cash or a cash equivalent (such as gift certificates or vouchers);
- it is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- it is given openly, not secretly; and
- gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of a director.

25.12 We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

25.13 What is not acceptable? It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- give, promise to give, or offer, a payment, gift or hospitality to a government official, agent or representative to "facilitate" or expedite a routine procedure;

- accept payment from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them;
- accept a gift or hospitality from a third party if you know or suspect that it is offered or provided with an expectation that a business advantage will be provided by us in return;
- threaten or retaliate against another worker who has refused to commit a bribery offence or who has raised concerns under this policy; or
- engage in any activity that might lead to a breach of this policy.

25.14 Facilitation payments and kickbacks - We do not make, and will not accept, facilitation payments or "kickbacks" of any kind. Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official. They are not commonly paid in the UK, but are common in some other jurisdictions.

25.15 If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with [the compliance manager].

25.16 Kickbacks are typically payments made in return for a business favour or advantage. All workers must avoid any activity that might lead to, or suggest, that a facilitation payment or kickback will be made or accepted by us.

25.17 Donations - We do not make contributions to political parties. We only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of a director.

25.18 Your responsibilities - you must ensure that you read, understand and comply with this policy.

25.19 The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for us or under our control. All workers are required to avoid any activity that might lead to, or suggest, a breach of this policy.

25.20 You must notify a director as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a client or potential client offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business. Further "red flags" that may indicate bribery or corruption are set out in the 15.4.

25.21 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct. We reserve our right to terminate our contractual relationship with other workers if they breach this policy.

25.22 Record-keeping - We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

25.23 You must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to managerial review.

- 25.24 You must ensure all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with our expenses policy and specifically record the reason for the expenditure.
- 25.25 All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as clients, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No accounts must be kept "off-book" to facilitate or conceal improper payments.
- 25.26 How to raise a concern - You are encouraged to raise concerns about any issue or suspicion of malpractice at the earliest possible stage. If you are unsure whether a particular act constitutes bribery or corruption, or if you have any other queries, these should be raised with a director.
- 25.27 What to do if you are a victim of bribery or corruption - It is important that you tell a director as soon as possible if you are offered a bribe by a third party, are asked to make one, suspect that this may happen in the future, or believe that you are a victim of another form of unlawful activity.
- 25.28 Protection - Workers who refuse to accept or offer a bribe, or those who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 25.29 We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.
- 25.30 Training and communication - training on this policy forms part of the induction process for all new workers. All existing workers will receive regular, relevant training on how to implement and adhere to this policy.
- 25.31 Our zero-tolerance approach to bribery and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.
- 25.32 Who is responsible for the policy? The board of directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with the directors also have day-to-day responsibility for implementing this policy, and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of and understand this policy and are given adequate and regular training on it.
- 25.33 Monitoring and review - the board will monitor the effectiveness and review the implementation of this policy, regularly considering its suitability, adequacy and effectiveness. Any improvements identified will be made as soon as possible. Internal control systems and

procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

- 25.34 All workers are responsible for the success of this policy and should ensure they use it to disclose any suspected danger or wrongdoing.
- 25.35 Workers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to the compliance manager.
- 25.36 This policy does not form part of any employee's contract of employment and it may be amended at any time. Potential risk scenarios: "red flags". The following is a list of possible red flags that may arise during the course of you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only. If you encounter any of these red flags while working for us, you must report them promptly to a director:
- 25.37 You become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- 25.38 You learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;
- 25.39 A third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- 25.40 A third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- 25.41 A third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- 25.42 A third party requests an unexpected additional fee or commission to "facilitate" a service; A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- 25.43 A third party requests that a payment is made to "overlook" potential legal violations; a third party requests that you provide employment or some other advantage to a friend or relative;
- 25.44 You receive an invoice from a third party that appears to be non-standard or customised
- 25.45 A third party insists on the use of side letters or refuses to put terms agreed in writing;
- 25.46 You notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- 25.47 A third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us;

- 25.48 You are offered an unusually generous gift or offered lavish hospitality by a third party. "Third party" in the context can mean a student, a parent, an awarding body or any other person or organisation which is not an employee or contractor of the College.

## 26 Fitness to Study Policy

### 26.4 Introduction

- 26.4.1 MPA acknowledges its duty of care to its students, and its staff, and the importance of supporting the health and wellbeing in relation to academic progression, training and study requirements and a wider student and staff experience whilst with MPA. MPA strives to create and promote a safe, healthy and supportive environment in which to learn, study and work.
- 26.4.2 The purpose of this Policy is to clarify how MPA intends to positively and supportively assist students in the context of their health and wellbeing. It seeks to assist MPA management in operating fairly and transparently, in cooperation wherever possible with students, under a published process and by way of an alternative to other processes such as those in respect of attendance, academic progression and discipline.
- 26.4.3 This Policy seeks to ensure that students are supported from the earliest opportunity in order to minimise and avoid the escalation of the welfare difficulties they may otherwise experience. MPA will, wherever practicable, look to deal with fitness to study concerns by way of open and inclusive dialogue with students, through structured meetings and the formulation and implementation of wellbeing plans to reach mutually agreeable outcomes.
- 26.4.4 This Policy is intended as a supportive and positive process to manage concerns regarding student fitness to study. In implementing the Procedure, MPA remains mindful of its legal obligations including its duty of care, its obligations under the Equality Act 2010 and its duty to make reasonable adjustments for students with disabilities. It will remain mindful of the sensitive nature of information to which fitness to study matters can give rise and the need to deal with such information fairly and lawfully in accordance with its obligations under the Data Protection Act 1998.
- 26.4.5 This Policy applies to all students throughout their period of enrolment with MPA including those who are requesting a return to study under this Policy. MPA may pause this Policy and related activity at any point if it determines that such action is fair and reasonable and taking into account the best interests of the student or of other students and staff ( e.g. if the student is hospitalized). Such action would be decided by the Academic Board and Senior Management/ the Directors.
- 26.4.6 In implementing this Policy, MPA will ensure that it directs students at each stage of the process to appropriate sources of support such as those detailed in the MPA Academic Regulations.
- 26.4.7 MPA is not precluded from making any decision under this Policy by the absence of medical evidence; this is in contrast to the College's Academic Regulations.

26.5 Guidance - Concerns regarding a student's fitness to study on a course and/or as a member of the MPA community, arising in the context of a student's health or wellbeing, may occur where, for example (but not limited to):

- Staff are concerned the student poses a risk to his/her own health, safety or wellbeing and/or that of any other person(s)
- The student's behaviour is adversely affecting their own academic progression and/or that of others and/or the teaching, learning, study or research of other students or staff and/or the enjoyment by students of a positive student experience
- The student's behaviour is placing unreasonable demands on members of staff and/or affecting their ability reasonably to carry out their duties (e.g. where the amount of time spent supporting a student is significantly disproportionate and/or beyond the reasonable boundaries of service/working practices);

26.5.1 MPA recognises that the type of factors which may give rise to concerns about students' fitness to study can vary according to the circumstances of a matter and MPA will consider matters on a case-by-case basis.

26.5.2 The College recognises that concerns about students' fitness to study can be raised in a variety of ways, for example by a member of staff or by other students, friends or flat-mates. Any member of staff to whom a concern about a student's health or well-being is reported, or who has a concern themselves, may wish to discuss those concerns in the first instance with the Student Support Officer/ relevant Head of Year. In so doing, staff members will remain mindful of the sensitive nature of the matter being discussed.

26.6 In making decisions about a student's fitness to study under this Policy, MPA may involve other members of College staff and external health care or other professionals (such as the local Community Mental Health Team, GP or other medical professionals). In so doing, MPA remains mindful of its obligations under the Data Protection Act 1998 to process students' personal information fairly and lawfully and will seek the student's consent to sharing their personal information wherever practicable.

26.7 This Policy is intended to provide a supportive and positive process; Students are therefore encouraged to engage fully at all times. However, in the event that a student is unwilling or unable to participate in any stage of the process, MPA may nonetheless continue to deal with the matter and/or to reach decisions in connection with the student's fitness to study, where it is reasonable to do so and having taken into account any reason for the student's non-engagement.

26.8 MPA may require that a student temporarily interrupts his/her studies as a precautionary measure during this Policy. This decision will not be added to the student's record. The terms of any interruption and any access restrictions or conditions will be notified in writing to the student.

26.8.1 The student will be given the opportunity to make written representations against an initial or extended period of interruption and any conditions attached to such interruption, to the Directors, normally within 5 working days of the date the decision to suspend is notified to the student.

26.9 Minor, emerging or initial concerns about a student's health or wellbeing are often best dealt with under routine wellbeing processes such as regular meetings with tutors or signposting to

MPA support services. However, if there is a concern that the student's health and wellbeing is impacting on their fitness to study, this should normally be dealt with through an informal meeting.

26.10 At the informal level 1 meeting the Course Leader will explain to the student the nature of the fitness to study concerns which have been raised and the evidence in support of them and explore with the student how the concerns might be addressed including by way of the offer or provision of academic or pastoral support to the student. Where appropriate the student will be directed towards professional support available through MPA and/or externally. Depending on the facts of a particular matter, discussion at a level 1 meeting may include a discussion (and, if practicable, agreement) about acceptable behaviour or escalation to level 2, or an indication that escalation may be made should there be further cause for concern.

26.11 The Course Leader will determine whether or not the student's fitness to study is impaired. Where found, s/he will determine the outcome to be taken in response and will seek to agree the outcome with the student. There are a range of potential outcomes which may ensue (which may be decided upon by the Course Leader notwithstanding that any such outcomes have not been agreed by the student). These include, but are not limited to, one or more of the following:

- No further action is required and the concerns have been resolved
- The student is signposted to any appropriate MPA services e.g. Learning Support or to external services and sources of support
- A wellbeing action plan is put in place which may include conditions such as those relating to the student's future behaviour
- The student's progress is monitored formally for a specified period in accordance with a wellbeing action plan and regular reviews take place with a specified member of staff to ensure that the student is engaging with the plan and appropriate support is being provided. The wellbeing action plan will clarify that failure by the student to engage with the wellbeing action plan or to make progress towards the targets or comply with any conditions set may result in the case moving to level 3 of the Procedures.
- Referral of the matter to other procedures e.g. Student Conduct

26.12 The student will be informed in writing, normally within 5 working days of the date of the informal level 1 meeting, of the Course Leader's decision and any outcomes decided upon, with reasons. Where appropriate to do so, the Course Leader/Course Tutor will arrange for another meeting to be held to review the situation.

26.13 MPA will keep a record of the level 1 meeting and its outcome until such time as the student graduates or leaves College. This record will be shared on a 'need to know' basis only with such persons as is necessary in the circumstances of the matter and in accordance with the Data Protection Act 1998.

26.14 Level 2 – Formal: Student Support Review Meeting

27.11.1 On-going, further or serious concerns about a student's fitness to study will normally be dealt with at a formal level 2 meeting. This might be the case, for example, where there is continuing concern about a student's fitness to study following a level 1 meeting, or when there is a serious concern which MPA considers would be more appropriately dealt with under level 2 than level 1.

27.11.2 In such circumstances, ongoing, further or serious concerns about a student's fitness to study will be referred to the Welfare Committee Chair who will convene a level 2 meeting. The Chair will nominate a member of the Senior Management Team to act as a Secretary to the level 2 meeting and to provide procedural support to the Chair of the level 2 meeting.

27.11.3 The Chair will invite other interested parties to inform the discussion as appropriate to the circumstances of the case. The aim of the meeting is to reach agreement with the student on outcomes. Where this does not prove possible the Chair and the Course Leader will make decisions on the outcome of the level 2 meeting.

27.11.4 The Head of Welfare will ensure that the Chair of the meeting and the Course Leader of the student's course or their nominee and the student concerned are invited to attend the meeting. They will also ensure that any other staff that the Chair deems relevant in the circumstances (for example, a member of the academic staff, counsellor etc) are invited to attend. The student will be informed of the identity of such other staff invited to the level 2 meeting and also in what capacity those members of staff are attending e.g. in the capacity of decision-makers, in a procedural capacity such as secretary or note-taker, in the capacity of providing information relevant to the circumstances and in any other capacity such as support for the student.

27.11.5 The Head of Academic Quality & Curriculum will ensure that information and evidence of the concerns is gathered for consideration by the Chair and the Course Leader at the meeting.

27.11.6 The student will normally be given at least 5 working days' written notice of the formal level 2 meeting, which will include details of the nature of the fitness to study concerns which have been raised, the evidence in support of them and the purpose of the formal level 2 meeting.

27.11.7 The purpose of the formal level 2 meeting is to:

- consider the fitness to study concerns raised and the available evidence and determine whether or not the student's fitness to study is impaired
- hear fully the student's perspective on and response to the concerns raised and on any proposed strategies for managing them;
- consider (if relevant) what (if any) action(s) have already been taken to support the student and the effectiveness of those actions including the student's engagement or otherwise with any support offered or provided;
- identify what actions might be appropriate in order to ensure a co-ordinated and effective response;
- if relevant, clearly set out the consequences if either the student or MPA does not complete any actions and/or there is a continuation or any further cause for concern;
- arrange a date (where appropriate) to meet to review the situation.

27.11.8 Following the meeting, the level 2 meeting the Chair and the Course Leader will determine whether or not the student's fitness to study is impaired and will determine the outcome in response to such determination.

27.11.9 Potential outcomes of the level 2 meeting include, but are not limited to, one or more of the following:

- No further action is required and the concerns have been resolved
- The student is signposted to any appropriate services e.g. disability services or to Learning Development Tutors or to external services and sources of support
- A wellbeing action plan is put in place including which identifies any supportive interventions and set any targets or impose conditions to manage the matter
- The student's progress is monitored formally for a specified period in accordance with any wellbeing action plan and regular reviews take place with a specified member of staff to ensure that the student is engaging with the plan and appropriate support is being provided. (The wellbeing action plan will clarify that failure by the student to engage with the wellbeing action plan or to make progress towards the targets or comply with any conditions set may result in the case moving to level 3 of the Procedures)
- Referral of the matter to other procedures e.g. Student Conduct
- MPA requires the student to interrupt their studies for a defined period of time.

27.11.10 The student will be notified in writing of the decision of the Chair and the Course Leader following the level 2 meeting and the outcome, with reasons, normally within 5 working days of the meeting date. A copy of any wellbeing action plan will be held by Welfare and will only be shared with those with whom it is necessary to do so and in accordance with the Data Protection Act 1998. Where appropriate, the written notification will inform the student that any repeat or additional concerns could result in the student's fitness to study being further considered under this Procedure.

27.11.11 At any follow-up meetings, the Chair of the formal level 2 meeting with the Course Leader will assess how the student has been since the level 2 meeting, review progress with the actions in any plan and determine whether there are any further requirements for support. If the fitness to study concerns have been resolved, no further action will ensue. If concerns continue a further level 2 meeting may be held. If concerns have increased, the Chair may propose that a level 3 fitness to study panel meeting be convened.

27.11.12 If appropriate, the Chair of the formal level 2 meeting will nominate a member of the level 2 meeting panel to deliver the decision to the student as appropriate to the specific circumstances of each case.

27.11.13 MPA will keep a record of the level 2 meeting and its outcome until such time as the student graduates or leaves MPA. This record will be shared only with such persons as is necessary in the circumstances of the matter and in accordance with the Data Protection Act 1998.

## 27.12 Level 3 – Persistent or Critical Concerns - Fitness to Study Panel Meeting

27.12.1 Persistent and/or critical concerns about a student's fitness to study will normally be dealt with under level 3. This might be the case, for example, where there is continuing serious concern about a student's fitness to study which has not been resolved under level 1 or 2, or where there are critical and urgent concerns about the safety of the student or of other individuals or the impact on the ability of others to study or work in a healthy or effective environment. The decision to convene a level 3 fitness to study panel meeting will be taken by the Directors together with the Head of Welfare.

27.12.2 The Head of Welfare will convene a fitness to study level 3 panel meeting with the student and other concerned parties, allowing normally at least 5 working days' notice of the meeting to the student.

27.12.3 The purpose of a level 3 fitness to study panel meeting is to allow the student and the College to address in detail the concerns that have been raised about the student's fitness to study. It will provide an opportunity, where relevant, for MPA to consider what (if any) actions have already been taken to support the student and the effectiveness of those actions including the student's engagement or otherwise with any support offered or provided. It will provide the student with a full and fair opportunity to respond to the concerns raised.

27.12.4 In dealing with matters under level 3, MPA may, as it considers appropriate in the circumstances, involve relevant members of staff and/or ask such individuals to attend the Fitness to Study Panel meeting.

27.12.5 The Head of Welfare and Head of Academic Quality & Curriculum will be responsible for appointing panel members and will identify a member of staff who will be responsible for preparing the Fitness to Study case, confirming the witnesses to be called to the panel meeting on behalf of MPA, collating evidence including (where relevant) medical reports and presenting the case to the Panel.

27.12.6 The student will be notified in writing of the date, time and place of the fitness to study panel meeting normally at least 5 working days in advance, and provided with a copy of this Procedure.

27.12.7 At the event, the Panel may ask questions of the student, his/her representative, and any witnesses at any time and may recall any witness. At the end of the panel meeting the fitness to study panel will retire in private to deliberate. The panel will determine whether or not the student's fitness to study is impaired and (if found to be impaired) whether or not the student is fit to study. In the event that a student's fitness to study is determined to be impaired, or they are found to be unfit to study, the panel will determine the outcomes to be agreed or imposed.

27.12.8 The decision and outcome of the fitness to study panel, with reasons, will be notified to the student in writing normally within 5 working days of the date of the panel meeting together with details of any right of appeal and right to request a return to study under this Procedure.

27.12.9 MPA will keep a record of the level 2 meeting and its outcome until such time as the student graduates or leaves MPA. This record will be shared only with such persons as is necessary in the circumstances of the matter and in accordance with the Data Protection Act 1998.

### 27.13 Medical reports

27.13.1 A student may be asked at any stage of the Procedure to consent to a medical or similar report being sought and disclosed to MPA in order to assist in its consideration and determination of the fitness to study concerns which have been raised including by way of considering what support arrangements might be made for the student.

27.13.2 MPA may seek a medical report in relation to a student's medical condition, the symptoms that they are experiencing, medical treatment or support that they have been or are

receiving, their prognosis, and how a condition may impact on the students' ability to study and/or engage in student life. In dealing with any such reports, MPA will at all times have due regard to the sensitive nature of the information they contain and will be mindful of whether any such request could prove intrusive or unhelpful to the student's wellbeing.

27.13.3 MPA recognises that it may not always be necessary or possible to get medical evidence. MPA will seek at all times to work alongside the student in a cooperative and supportive fashion to obtain such evidence.

#### 27.14 Return to Study

27.14.1 The provision for a student to request a return to study following a period of interruption is specific to this Procedure.

27.14.2 Registry staff together with the Principal will be responsible for identifying when a student's period of interruption is coming to an end and will write to the student to invite them to make a request to return, should they so wish.

27.14.3 A student who wishes to make a request to return to study under the Procedure should write to the Principal.

27.14.4 Any student who has interrupted will be required to satisfy the relevant Course Leader and Principal that they are fit to return and to resume their studies and will be required to provide satisfactory evidence in support of their request.

27.14.5 The Course Leader responsible may seek such information and professional opinions internally, externally and from the student making the request to return to study and from members of staff as he or she considers reasonable in the circumstances in order to determine the request to return to study. The evidence required will depend on the circumstances of the case but might include information from a GP or reports from other professionals involved.

27.14.6 Any costs associated with obtaining an external report or other evidence would normally be met by the student. Any exception to this will be determined by the Directors.

27.14.7 Any student who has a continuous period of interruption of 24 months or longer will not normally be entitled to return, however in exceptional circumstances such a request might be reviewed at the discretion of the Directors.

27.15 Any student wishing to appeal against any decision related to this procedure for example to require them to interrupt or to deny them permission to return to study, may lodge a written request for appeal or complaint with the Head of Academic Quality & Curriculum. Please see Complaints Policy and Appeals Policy for further details.

## **24. Learner Support Policy**

Currently under review.

## **25. Academic Engagement Policy**

Currently under review.

### Appendix 1: Quality Management Cycle 2018-19

**The Quality Cycle** - The quality process involves a cycle of activities of which self-assessment and action planning are major parts. This process helps to inform future strategic planning and establishes evidence and review process in line with indicators/targets against which MPA is judged externally, by Ofsted, SFA/ EFA, QAA, HEFCE, TEF etc. The key elements within an average academic year include:

ACTIVITY/ EVIDENCE	ESSENTIAL TASKS	STAFF RESP.	TIME- SCALES	SUPPORTING DOCUMENTS	IMPACT SUMMARY
Staff review - observations of teaching & learning (& appraisal)	Full observation report, partial overview report, feedback/summary report following an observation (completion with teacher). This is a 2 tier system to assist with the balance between full time and freelance teaching staff.	Principal; HODs Directors	On-going	Form templates - Staff Observation; Class Overview; Staff Review (Appraisal)	Improved standards
Student evaluations	End of term survey questionnaires to student body (all years)	VP; HOAQ	Dec / Mar / June	Questionnaires & feedback comments	Enhanced student engagement
Staff completing assessment reports / feedback	Technique & performance reports (as scheduled) for formative & summative assessment tasks	Principal/ HOAQ	Dec, Feb & June	Reports	Quality feedback
Staff evaluations	Evaluation box available in staff room	HOAQ / HODs	On-going	Questionnaires & statistics/ comments	Enhanced staff engagement
Data analysis: Retention, achievement & progression reporting	Data scrutiny & KPI setting. Action planning as appropriate	HOAQ / VP	Jan & July	Annual report / Statistics for External partners	Quality evaluations in relation to competitors & industry
Producing self-assessment report / Annual Report	Identifying strengths & weaknesses, collating data, action planning for future	HOD; HOAQ; Directors	July	Review of previous years & relevant external reports	External & internal quality measure
Curriculum Planning & Review Committee co-ordinated tasks for course/ module evaluation	HOD task setting for staff in liaison with Head of Studies for departmental review; college wide review as required.	Principal / CL/ HOAQ	On-going/ termly	Minutes, policy, reports, updates to course handbooks etc	As above
Internal Moderation	Individual assessing staff sampling	Principal /	On-	Moderation	Confidence in

(formative assessments) – practical	& double marking where needed (according to planned matrix)	HOD	going	report	quality of assessment
Internal Moderation at final (summative) assessment – practical	Individual / panel assessing staff sampling & double marking where needed (according to planned matrix)	Principal / HOAQ / CL / HOD	As above	Moderation report	As above
Internal moderation of written assignments (sampling)	Individual assessing staff sampling & double marking where needed (according to planned matrix)	Principal / HOAQ / CL / HOD	As above	Moderation report	As above
External Examiner reports review at TQE meetings	Reports considered at relevant meeting	HOAQ / CL	July/ Sept.	N/A	As above
Internal Moderation reports review at TQE meetings	Reports considered at relevant meeting	HOAQ / CL / Principal	TBC	N/A	As above
Policy review	Updating of procedures in line with new / amended activities/ policy annual updates & review	HOAQ	August	All policies & minutes of any suggested alterations	Currency in education & industry
Moderation team create matrix for year	In CPR meeting – course discussion & assessment calendar planning needed.	HOAQ / Principal	Sept.	Previous documents	Reliable QA procedures.

## APPENDIX 2: Teaching Observation Forms (Review, Appraisal and Peer)

Notes: These are currently under review – please see the Principal for copies pertaining to each term in 2018/19.

- Full observation report
- Partial overview report
- Feedback/summary report following an observation (completion with teacher)
- Peer review template
- Peer review discussions notes
- Peer review record

## APPENDIX 3: Moderation

Assessment Moderation Matrix

BA (Hons.) Musical Theatre (UCA)  
Lv 6 Diploma in Musical Theatre / Lv 6 Diploma in Dance (TCL)

Internal Moderation record for academic year 2018/19.

Please see Course Leader / Head of Academic Quality & Curriculum for current versions.

Displays all students, all units of study and all assessments/ assessors annually.

**Assignment Mark Sheet**

Moderation / Second marking report sheet used with student assignments (following first marking).

**Practical Panel Assessment Observation**

Practical observation of panel assessment process and discussions to agree final mark.