Contents

Mission, Vision, Objectives

Vision

- **The Academy of Leadership & Management** aims to be a leading provider of executive education and key people development, through accredited programmes leading to high level qualifications and outcomes. Our programmes will be built around our core values of Integrity, Ingenuity, Inspiration and Impact.

Mission

- **The Academy of Leadership & Management** will deliver high quality impacts for our learners, through combinations of executive coaching, tutoring, high quality online and group learning and insightful assessment leading to both personal progression and high level qualifications. We aim to be the leading provider of qualifications based programmes, a key partner in delivery of other innovative programmes and qualifications and develop strong links to higher education.
  - **partners in design**
    - enhancing stakeholder value
    - encouraging results by design
  - **performance through delivery**
    - empowering growth for individuals and teams
    - encouraging action centred learning
    - driving personal development through a menu driven approach
  - **results through productivity**
    - encouraging results through feedback
    - striving for excellence and recognition
    - achieving results through managing learning

Objectives

- **The Academy of Leadership & Management's** objectives are: -
  - 300 high level qualifications achieved by our learners every year
  - Enhance people potential through recognition and personal growth
  - Development of new markets and qualification routes, including both domestic and international
  - Development of businesses and organisations through key people and organisational development
  - Development of key partnerships through which to deliver our aims and objectives

About this Policies and Procedures Manual

This Polices & Procedures Manual has been designed to articulate the company's policies under ten standards It is divided into **two** main sections: -

- **POLICIES** or in other words, what we believe in as a company, and have committed ourselves to

and

- **PROCEDURES** or, to put it simply, how we go about doing what we believe in.

Everyone in **The Academy of Leadership & Management** has a responsibility for quality. However, the directors have specific responsibility for making sure that our high standards are maintained. This means that at regular intervals, quality of provision is reviewed and measured. Also, to make sure that the Policies and Procedures Manual remains relevant to the everyday needs of our business, it will be reviewed by one of the directors every year, and changed or updated, as necessary.

Important note: Policies will be reviewed annually, by the Director responsible, and approved by the directors as required. Review dates are shown below the signature date on each appropriate page.

Strategic Management Policy

The Academy of Leadership & Management will, at all times have a current business plan, detailing where we are going and how we intend to get there. Everyone in the organisation should be involved in its development and have an understanding of our purpose and direction.

The Business Plan will be structured around the following areas: -

- **Strategic Management**
- **Quality Management**
- **Marketing and Customer Care**
- **Human Resources and Development**
- **Equal Opportunities**
- **Health and Safety**
- **Communications and Administration**
- **Guidance Services**
- **Programme Design and Delivery**
- **Assessment for Certification**

along with a narrative of the previous year's achievements, SWOT analysis and plans to achieve the company's aims and objectives in the short, medium and long term.

Strategic management will also be reviewed on a regular basis at the company's management meetings.

Policy affirmed by: -

John Parker, Director

Janet Parker, Director

June 2021
Review date: June 2022

Policy No.	1	**Update No.**	6	**Issue date**	06/21	**Issued by**	JIP	**Approved by**	JP	**Page no.**	1 of 1

Quality Management Policy

The Academy of Leadership & Management is a quality provider of training, development and business services. This means that our products and our people have to be of the highest standard we can produce. Quality improvement is the job of every single person in our company. Without quality, we can't believe in what we do.

The Academy of Leadership & Management is committed to the standards and expectations of:-

- **The Institute of Leadership and Management (ILM)**
- **The Small Firms Enterprise Development Initiative (SFEDI)**
- **The Institute of Enterprise and Entrepreneurs (IOEE)**
- **Northern Council for Further Education (NCFE)**

We have a clear commitment to quality throughout our organisation. We realise, however, that quality does not happen by itself. That's why we are committed to a system of regular review and improvement, both of our products and our resources, based on the standards and expectations of the above bodies. By doing this, we can ensure that the needs of our clients and students and our staff are met at all times.

Quality Management will also be reviewed on a regular basis at the company's management and team meetings and at internal quality assurance, (IQA), meetings.

Policy affirmed by: -

John Parker, Director

Janet Parker, Director

June 2021
Review date: June 2022

Policy No.	2	**Update No.**	8	**Issue date**	06/21	**Issued by**	JIP	**Approved by**	JP	**Page no.**	1 of 1

Marketing and Customer Care Policy

The Academy of Leadership & Management has a hard earned reputation for quality, excellence and delivery. Our products should be designed to reflect these values, and to meet the needs of our clients. This means keeping ourselves informed of developments in the marketplace and, where appropriate, actively leading it to recognise its needs within the context of our products and services. Our promotional material should be accurate and convey the quality image of our company that we wish to project. Our sales and marketing activities need to be regularly appraised for their success and relevance.

It is the responsibility of all personnel to look for, recognise and act upon opportunities within the marketplaces in which we operate, and to identify potential areas for development.

The Academy of Leadership & Management is committed to the care of its customers. Every client is allocated an account manager who is their designated first point of contact. Customer relationships are developed and maintained through regular communication and reviewed on a regular basis at the company's management and team meetings.

Similarly, all learners will have at least one named contact within the organisation who is responsible for ensuring that all their needs and issues are dealt with promptly, effectively and courteously.

Marketing and Customer Care will also be reviewed on a regular basis at the company's management and team meetings.

Policy affirmed by: -

John Parker, Director

Janet Parker, Director

June 2021
Review date: June 2022

Policy No.	3	**Update No.**	6	**Issue date**	06/21	**Issued by**	JIP	**Approved by**	JP	**Page no.**	1 of 1

Human Resources and Development Policy

We are only as good as our people. Our staff must be competent to deliver our training programmes to the high standards required. Recruitment and selection criteria must be appropriate to vacancies, and all staff will be given accurate job descriptions. We are also committed to a system of regular performance appraisals.

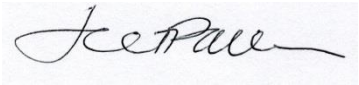
As a learning organisation, we place particular importance on staff development. Training needs are assessed on a regular basis and a budget is held for external training. New staff receive on-the-job induction training at the end of which, additional training needs are evaluated. We actively encourage our people to gain further qualifications, and in most cases, will provide financial assistance.

Our people are encouraged to seek, act out and evaluate learning opportunities within their current job role. The company considers the asking of questions to be a `virtuous activity', and actively encourages the free exchange of information in order to reach new levels of understanding.

Human resources and development will also be reviewed on a regular basis at the company's management and team meetings.

Policy affirmed by: -

John Parker, Director



Janet Parker, Director

June 2021
Review date: June 2022

Policy No.	4	**Update No.**	6	**Issue date**	06/21	**Issued by**	JIP	**Approved by**	JP	**Page no.**	1 of 1

Equality and Diversity Policy

The Academy of Leadership & Management positively welcomes and aims to support the growing diversity of the community we serve and the people we employ. Our diversity is our strength and we are committed to providing services to our many different communities, through a workforce that reflects the diversity of society.

We also acknowledge that we live in an unequal society in which many people face discrimination. **The Academy of Leadership & Management** believes that equality of opportunity and freedom from discrimination are fundamental human rights. We actively oppose all forms of discrimination and are committed to the principle that no person shall face discrimination by being treated unfairly or being denied access to services or employment opportunities.

We will not discriminate (indirectly or directly) on the grounds of race, gender, gender reassignment, marital status, sexual orientation, age, religious beliefs, HIV status, or disability (covering sensory and physical disabilities, learning disabilities and mental health status).

Discrimination as outlined above and harassment is unacceptable and contrary to our explicit aim of providing quality services and recruiting and retaining diverse staff.

The Academy of Leadership & Management recognises its responsibilities under the following equalities legislation and related Codes of Practice: -

- **The Sex Discrimination Act 1975 (updated 1986)**
- **The Equality Act 2010**
- **The Disability Discrimination Act 1995 and Amendments**
- **The Human Rights Act**
- **Employment Equality (Age) Regulations 2006**

Through Employment Equality regulations, **The Academy of Leadership & Management** recognises its responsibilities to promote equal opportunities in employment on the grounds of sexual orientation, religion or belief and age.

Equal Opportunities and Diversity Policy (cont'd)

We intend to promote equality, value diversity and prevent discrimination through our roles as

- Service Provider
- Employer
- Community Member

Our commitments

- We will identify, tackle and prevent any form of institutional discrimination.
- We will promote equality of opportunity and fair treatment for all.
- We will build on the strengths of diversity and aim to promote good relations between people, wherever possible.
- We will implement a positive approach to equality, promoting any and all schemes that link in with our core beliefs on the subject.
- We will ensure that all our partners and contractors are informed of our equality/diversity commitments and work towards the adoption of a shared code of practice.
- We will monitor and evaluate all aspects of service delivery and employment to inform our progress, objectives and review of outcomes. We will also initiate changes where necessary.
- We will ensure that all managers and staff are clear about their roles and responsibilities under equalities legislation and policy and are provided with learning and development opportunities to develop skills, knowledge and competencies to facilitate their roles.

Service delivery

We will work in partnership with staff and other stakeholders, in order to translate statutory requirements and local needs into meaningful and achievable equality/diversity objectives and outcomes. We will work to include the consideration and incorporation of diverse needs in all our key functions, policies and services. We aim to achieve this within a culture of continuous improvement. We aim to become an organisation where thinking about equality/diversity issues and objectives is integral to service delivery and review.

We will promote equal access to services and accessible information about services. We will work towards identifying, understanding and eliminating barriers to equality of access, equality of treatment and equality of outcome in the services we plan and provide and the staff we employ to deliver them.

Equal Opportunities and Diversity Policy (cont'd)

Employment
We will strive to achieve a representative and well-equipped workforce at all levels, to reflect and provide/commission services for the diverse local communities we serve. We aim to become an inclusive organisation, where diversity is valued, respected and built upon, so that we are able to recruit and retain the best staff to meet diverse needs.

We will strive to create an ethos of diversity and equality by reviewing working practices and procedures to ensure that they do not discriminate against any particular sections of the workforce.

We will also achieve this through the introduction of anti-discriminatory practice in all areas of work. We will not tolerate harassment or bullying of employees by other employees whatever their level and will take remedial action in accordance with our Policy Statements and Guidelines and revised Procedures for Dealing with Complaints of Harassment and Bullying.

Our employees are our greatest assets. We will work in partnership with them. Through a programme of learning and development and the provision of information, we will strive to ensure that employees are aware of their individual and collective responsibilities under our Equal Opportunities Policy.

Where appropriate and allowed in law, we will implement positive action initiatives as defined by the Equality Act 2010.

We will seek to provide equal pay for equal work by continuing to apply job evaluation schemes that objectively apply pay to job requirements, roles and responsibilities for implementation, monitoring and review.

The directors will champion and lead by example by using the equalities strategic framework to encourage the integration of equality/diversity issues in all aspects of our work. The directors and management will actively help to promote equality/diversity issues/actions.

Account managers will maintain an overview of their projects and ensure effective development, implementation and monitoring of equality/diversity. They will also ensure that the incorporation of key equality/diversity objectives arising from this work become incorporated within development plans.

Equal Opportunities and Diversity Policy (cont'd)

Managers will demonstrate commitment to equal opportunities by promoting them within their everyday roles, for themselves and their staff; identify appropriate training needs and provide training opportunities; monitor the effectiveness of equalities policies and programmes in their areas; feed into the equality/diversity objective setting and review processes.

Staff will be encouraged to demonstrate commitment to equalities by taking active steps to challenge discrimination and harassment; feed into the equality/diversity objective setting and review processes and support managers in their effective implementation.

Contractors will incorporate **The Academy of Leadership & Management's** equality/diversity policy commitments in all dealings and practices on behalf of **The Academy of Leadership & Management**.

Partners will need to be aware of **The Academy of Leadership & Management's** equality/diversity policy commitments and objectives and incorporate these within their work in all key and relevant areas.

Equal opportunities will also be reviewed on a regular basis at the company's monthly management and team meetings.

The Academy of Leadership & Management is also committed to the protection of vulnerable adults and young people who work within our programmes. At present, this issue is covered within our Equal Opportunities policies, as the organisation does not, in general, work with such individuals. However, it is the policy of the organisation to maximise protection of all its learners, and to bring such issues to the attention of clients. Therefore, **The Academy of Leadership & Management** expects discussion on issues of learner protection and disclosure to be discussed as part of monthly discussions on equal opportunities, and for clients to be informed of such issues at the start of any contract and during reviews.

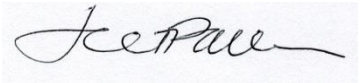
Equal Opportunities and Diversity Policy (cont'd)

The following statement has been adopted as a benchmark for inclusion in any communications with clients, especially in contracts.

"The Scottish Government has established a scheme to promote safer recruitment practices called Disclosure Scotland which may have implications for your business. You can find further information on the scheme and the Disclosure Scotland web site www.disclosures.org.uk

Policy affirmed by: -

John Parker, Director



Janet Parker, Director

June 2021
Review date: June 2022

Health and Safety Policy

The Academy of Leadership & Management is committed to health and safety in all areas of our operations. The company, its management and all employees will, at all times, endeavour to ensure that all reasonable arrangements and precautions are made to maintain high levels of safety. The company will maintain provision for health and safety at or above levels stipulated by government legislation.

All company employees (including those working from home) are responsible for Health and Safety in the workplace. Line managers are responsible for agreeing individual procedures for each workplace. Areas requiring attention and agreement include first aid provision, equipment handling, fire procedures, evacuation procedures, emergency procedures, compliance with current legislation, other requirements relevant to individual company circumstances.

The directors (Janet Parker and John Parker) are ultimately responsible for provision of health and safety. This is delegated to line managers and local representatives as appropriate.

All members of staff are responsible for health and safety as set out in their job description, the Procedures Manual & the various legislation that may from time to time be in force. In this respect, the cooperation of all employees is essential, and required by both policy and law.

All employees may be requested to inspect work and other areas. Where specialist knowledge or assistance is required, this will be requested of management and, where immediate assistance cannot be provided, management will make every effort to find and distribute the information.

It is the responsibility of all employees to record all accidents that occur within the workplace or training venues in the accident book. Details of accidents reportable under are detailed in our company procedures and accident reports are held on file by Janet Parker. It is the responsibility of all employees to ensure that they are aware of these regulations.

Health and Safety Policy (continued)

All employees must ensure that they are aware of evacuation procedures as applied to any building in which they are situated, and that all people in their charge are similarly aware. Evacuation procedures must be practised at least every six months.

All work areas must be inspected for health and safety regularly, at least annually, using the premises audit or project contract rider.

First aid provision must be made within the offices of the company. Health and safety training is to be undertaken on an ongoing, as required basis during individual and team meetings.

Health and Safety will be reviewed on a regular basis at the company's management and team meetings.

Visitors, Clients, Apprentices, Contractors Undertaking Work and Others

All visitors, clients, learners, contractors, contractor's mates and others, invited or expected to work on **Academy LM** premises are required to fully comply with this Health and Safety Policy and any other specific rules and conditions applicable to them throughout their period of engagement or visit.

All visitors / clients / learners / contractors / contractor's mates and others, whilst on the premises, shall:

Comply with all relevant health and safety legislation appropriate to their area of work activity / equipment / substance use and service provided.

Comply and co-operate fully with all instructions, safe working practices and guidance as supplied by **DA Training and Consultancy** Limited.

Ensure co-operation and co-ordination with **DA Training and Consultancy** Limited, providing any health and safety documentation requested.

Report to the First Aider / Emergency First Aid at Worker (EFAW) any incident, injury or potentially dangerous situation which could cause injury or ill health.

Ensure that any protective equipment is worn and enforced always.

Ensure sufficient information, instruction, training and supportive supervision is provided so that work can be conducted in a safe and healthy manner, without risk to either themselves, Academy LM employees or others that may be affected.
Academy LM have a particular duty of care towards any employed 16-18-year-old or delegate (but have not yet reached the age of 18). Each young person will fully comply with all the employees' general responsibilities, and shall:
Comply with the requirements of the individual 'Young Persons' Risk Assessment.

Comply fully with this Policy and any other Health and Safety guidance given by the Operations Director

When in doubt, advice should be sought from the Principal.

Apprentice Locations

All employer facilities and particularly apprentice facilities are subject to a full risk assessment by Academy LM. Compliance with relevant legislation is reviewed and the standard 10 completed. Employer insurances are checked for sufficiency and validity.
Each apprentice will receive the following from the employer, validated by Academy LM:

Risk assessment	Risk assessment of the workplace
Induction	Induction training, part of which will cover Health and Safety
Supervision	Supervisors should be trained to supervise young people and apprentices
Training	Health and safety training is an integral part of any apprenticeship
Protective equipment	Employer will provide and pay for appropriate protective clothing.

Employee Training:

- All staff are required to undertake mandatory training modules which includes health and safety.
- All new staff must undertake an induction (including health and safety components and and mandatory training.)
- Updates are provided to employees at monthly meetings or via specially called meetings should the ned arise
- Health and Safety training forms part of our skills matrix. Should areas be identified for training requirements, training is implemented.

Any other training deemed essential for the role/sector.

Policy affirmed by: -

John Parker, Director

Janet Parker, Director

June 2021
Review date: June 2022

Communications, Administration and Information Security Policy

Effective communication is of vital importance within a 'people' organisation like **The Academy of Leadership & Management**. That's why management and team meetings take place regularly. That's why all our staff are expected to have a monthly 'one to one' meeting with their line manager, and regular meetings with the rest of their colleagues. That's why we speak to our clients on a regular basis to make sure that we are meeting their needs and dealing with any problems. And that's why an integral part of our service is regular individual contact between tutor/coach/supervisor and learner.

We also realise that without effective administration we cannot function properly. It is our responsibility to our clients and ourselves, to ensure that our administration is of the highest possible standard. We must all constantly be looking for ways to improve the efficiency of this part of our business.

The Academy of Leadership & Management is committed to the integration of new technologies to maximise the effectiveness of our internal and external communication and administration.

Communications and administration will also be reviewed on a regular basis at the company's management and team meetings.

The Academy of Leadership and Management is also committed to information security, in line with GDPR and any other legislation that may from time to time arise. The next section of this policy relates to information security.

The Academy of Leadership and Management operates a learner management system, whereby learner journeys for all our programmes are managed by a team known as Learner Managers. We commit to providing clear guidance, support and communication to all learners engaged in our programmes, to include, but not be limited to, timetabling, communication, programme liaison, assessment systems, internal quality assurance, liaison with awarding bodies and materials providers, interfacing between learners and the programme teams and general support. We see this as one of our most important functions, as this gives learners the confidence to learn in a blended environment.

Communications, Administration and Information Security Policy (continued)

The directors and management of **The Academy of Leadership and Management** are committed to preserving the confidentiality, integrity and availability of all the physical and electronic information assets throughout the organisation in order to preserve our competitive edge, cash-flow, profitability, legal, regulatory and contractual compliance and commercial image. Information and information security requirements will continue to be aligned with our goals and the Information Security Management System, (ISMS), is intended to be an enabling mechanism for information sharing, for electronic operations, including e-commerce in future, and for reducing information-related risks to acceptable levels.

Our current strategic business plan and risk management framework provide the context for identifying, assessing, evaluating and controlling information-related risks through the establishment and maintenance of an ISMS. The Risk Assessment, Statement of Applicability and Risk Treatment Plan identify how information-related risks are controlled. The Operations Director is responsible for the management and maintenance of the risk plan. Additional risk assessments may, where necessary, be carried out to determine appropriate controls for specific risks.

In particular, business continuity and contingency plans, data backup procedures, avoidance of viruses and hackers, access control to systems and information security incident reporting are fundamental to this policy.

All members of our team and all subcontractors and associates are expected to comply with this policy and with the ISMS that implements it. All team members and appropriate external parties will receive appropriate training. The consequences of breaching the information security policy are set out in The Academy's disciplinary policy and in contracts and agreements with third parties.

The ISMS is subject to continuous, systematic review and improvement, in line with the organisation's quality system.

We have achieved certification of its ISMS to Cyber Essentials as certification of information security and will consider ISO27001:2013, should this be required.

This policy will be reviewed to respond to any changes in the risk assessment or risk treatment plan and at least annually.

Communications, Administration and Information Security Policy (continued)

In this policy, 'information security' is defined as preserving the availability, confidentiality and integrity of the physical and information assets of **The Academy of Leadership and Management.** These terms are further defined below:

Preserving - This means that management, all full time or part time team members, sub-contractors, associates, consultants and any external parties have, and will be made aware of, their responsibilities (which are defined in their job descriptions or contracts) to preserve information security, to report security breaches and to act in accordance with the requirements of the ISMS. All team members will receive information security awareness training and, where required, more specialized team members will receive appropriately specialised information security training.

the availability - This means that information and associated assets should be accessible to authorised users when required and therefore physically secure. The computer network must be resilient and **The Academy of Leadership & Management** must be able to detect and respond rapidly to incidents (such as viruses and other malware) that threaten the continued availability of assets, systems and information. There must be appropriate business continuity plans.

Confidentiality - This involves ensuring that information is only accessible to those authorised to access it and therefore to preventing both deliberate and accidental unauthorised access to **The Academy of Leadership & Management's** information and knowledge and its systems, including Office 365 systems and Moodle Virtual Learning Environment.

and integrity - This involves safeguarding the accuracy and completeness of information and processing methods, and therefore requires preventing deliberate or accidental, partial or complete, destruction or unauthorised modification, of either physical assets or electronic data. There must be appropriate contingency and data backup plans and security incident reporting. **The Academy of Leadership & Management** must comply with all relevant data-related legislation in those jurisdictions within which it operates.

of the physical (assets) - The physical assets of **The Academy of Leadership & Management** including, but not limited to, computer hardware, data cabling, telephone systems, filing systems and physical data files.

and information assets - The information assets include information printed or written on paper, transmitted by post or shown in films, or spoken in conversation, as well as information stored electronically on servers, website(s), extranet(s), intranet(s), PCs, laptops, mobile phones and PDAs, as well as on CD ROMs, floppy disks, USB sticks, backup tapes and any other digital or magnetic media, and information transmitted electronically by any means. In this context, 'data' also includes the sets of instructions that tell the system(s) how to manipulate information (i.e. the software: operating systems, applications, utilities, etc).

***Of The Academy of Leadership and Management* - The Academy of Leadership & Management** and its team, associates and subcontractors.

Communications, Administration and Information Security Policy (continued)

The ISMS is the Information Security Management System, of which this policy and other supporting and related documentation is a part, and which has been designed in accordance with the specification contained in Cyber Essentials and aligned with ISO27001:2013. It is integrated into the overall Policies and Procedures Manual for the Academy and can be found in the Communication, Administration and Information Security section of the system.

A **SECURITY BREACH** is any incident or activity that causes, or may cause, a break down in the availability, confidentiality or integrity of the physical or electronic information assets of The Academy.

See also 15. Privacy policy

Policy affirmed by: -

John Parker, Director

Janet Parker, Director

June 2021
Review date: June 2022

Guidance Services Policy

It is our responsibility as a learning provider to ensure that learners on our development programmes receive as much counselling and guidance as they need during their time with us. Wherever practicable, all learning programmes will be supported by some levels of individual guidance. As a minimum, this should include some means to contact members of the programme team. A preference for this is email, through a central mailbox arrangement.

Learners are also expected to have a personal development plan of some description. Also, consideration should be given to issues such as personal profile and learning style analysis when developing and delivering programmes.

Guidance services will also be reviewed on a regular basis at the company's management and team meetings.

The Academy is committed to supporting SEND / High Needs individuals. Each case will be handled on an individual basis and must include reference to the relevant awarding body.

The Academy is committed to supporting gifted, able or talented individuals on our programmes. Each case will be dealt with on an individual basis, with appropriate reference to the awarding body.

Policy affirmed by: -

John Parker, Director

Janet Parker, Director

June 2021
Review date: June 2022

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Programme Design and Delivery Policy

We are committed to the continuous assessment and improvement of our learning provision. All our programmes should be relevant to the needs of both our clients and our learners. They should also lead to the award of awards or qualifications wherever available.

The Academy of Leadership & Management programmes are all designed to enhance stakeholder value through managed learning, by: -

- Identifying objectives
- Design and planning
- Inspiring and motivating
- Tailoring the options
- Focusing on action
- Measuring progress
- Achieving results

By directly aligning people development with organisational objectives, we work in partnership with our clients to maximise performance and productivity.

It is our policy to ensure that any external policies relating to programme delivery are strictly adhered to. This includes, but is not limited to, Off The Job learning requirements for apprenticeship programmes and guided learning hour specifications from awarding bodies.

The Academy is committed to clear evaluation of learning, processes and assessment outcomes. Procedures for this can be found in the relevant sections of the manual. This will include, but not limited to, individual surveys of learners, IQA reviews of delivery and assessment activities, programme level evaluation and regular strategic review. Data from these activities will be stored on our secure server.

Programme design and delivery will also be reviewed on a regular basis at the company's management and team meetings.

Policy affirmed by: -

John Parker, Director

Janet Parker, Director

June 2021
Review date: June 2022

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Assessment for Certification Policy

It is **The Academy of Leadership & Management's** policy to associate all training and development activities to national standards, where these are available. The company will offer a range of academic and vocational qualifications in a number of fields and will adhere to the relevant awarding body standards at all times.

All learners will be made aware of the opportunities for accreditation of prior learning, and the company will support learners who require this recognition.

All learners will be given appropriate support and assistance to enable them to complete the course of study undertaken.

All Assessors, Internal Verifiers and other relevant staff employed by the company will be qualified to at least the awarding body's minimum qualification level.

All portfolio materials will be kept for the requisite time as detailed within awarding body procedures and then disposed of by either return to candidate or destruction.

The Academy of Leadership & Management is committed to the shaping of new and innovative awards and qualifications, in partnership with its awarding body partners.

Assessment for Certification will also be reviewed on a regular basis at the company's management and team meetings.

Internal Quality Assurance (IQA)
IQA forms an important element of awarding body quality assurance and is an important part of the procedures in place for centre recognition. It is a standard process, imposed on awarding bodies by regulators, so the process is the same for all awarding bodies with whom we deal. If there are any variations, these will be noted separately under individual codicils to this policy / procedure.

IQA is set up to ensure:

- An appropriate design of programmes to meet awarding body requirements
- Effective delivery that meets learner expectations of their learner journey
- Accuracy and consistency of interpretation of qualifications or standards
- Consisten assessments
- Maintenance of a documented audit trail to enable verification, certification and distribution of awards to learners
- Monitoring, review and evaluation for continuous improvement

IQA links to External Quality Assurance, (EQA), carried out through the arrangements applied by awarding bodies.

Assessment for Certification Policy

The Academy of Leadership and Management's IQA processes seek to follow best practice principles and the highest possible standards of design, delivery and assessment, in line with our aspirations for lowest risk recognition by awarding bodies. It should therefore follow the entire learner journey, from initial recruitment to certification. This means that there is an expectation that an individual learner will have been supervised, at least once, by an IQA person, known as an Internal Verifier.

Recognition of Prior Learning (RPL)

Recognition of Prior Learning, (RPL), is an assessment process that makes use of evidence of a learner's previous achievements, knowledge, understanding or skills that they already possess, to demonstrate competence against a unit or qualification. Through the RPL process, evidence of a learner's previous achievement, (learning), is assessed against the learning outcomes and assessment criteria of a unit. It is our policy to provide RPL to any candidate and to follow the procedures as set out in our Procedures Manual

The definition of RPL is quite specific and relates to assessment of experience, knowledge, understanding or skills leading to the award of credit. Assessment is conducted against the learning outcomes and assessment criteria of a unit and is subject to exactly the same internal and external quality assurance requirements as any other kind of assessment.

Policy affirmed by: -

John Parker, Director

Janet Parker, Director

June 2021
Review date: June 2022

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Plagiarism and Cheating Policy

Plagiarism
Plagiarism is a specific form of cheating which applies to assignments completed by students independently. It is the substantial, unacknowledged incorporation into a student's work of materials derived from published or unpublished work by another person.

We take all incidents of plagiarism seriously, especially those incidents which are a determined and deliberate attempt by the student to gain marks for an assignment without having done a substantial portion of the work themselves. Published work includes books, articles and materials found on the internet while examples of unpublished work could be a piece of work previously submitted by another student, or work about to be submitted by another student.

Examples of plagiarism include:

- Extracts from another person's work without using quotation marks and/or an acknowledgement of the source
- Summarising the work of another or using their ideas without an acknowledgement of the source
- Copying or using the work of another student (past or present) with or without that person's knowledge or agreement
- Purchasing essays or downloading them from the internet to submit them as your own work.

All students will be required to confirm the authenticity of their work for every submission. If this statement is untrue, the student acknowledges that an assessment offence has been committed. Plagiarism can result in a student being withdrawn from a qualification.

Guidelines
The following guidelines may be helpful:

- If you use someone else's exact words in your work, they must be in quotation marks. Use quotations sparingly and only when you feel the author has expressed something so well and so concisely that the words cannot be improved.
- When you have used a quote, you must provide the name of the author, the date of their work that you have referred to and the page number where you got the quotation from immediately after the quotation (e.g. Hill, 2004, p. 42) and also provide full details of the reference in the bibliography.
- You must provide a bibliography - a list of books, articles and any other sources you have quoted - at the end of your assignments.

Plagiarism and Cheating Policy (continued)

Guidelines (cont'd)

- The Harvard system for referencing sources is well-established and you can find guidance on how to use it on the internet.
- When making a reference to a book the Harvard format is: Hill, P. (2004)
- Concepts of coaching: a guide for managers. ILM, London. and for a reference to an article the Harvard format is: Grant, A.M. (2010) It takes time: a 'stages of change' perspective on the adoption of workplace coaching skills. Journal of Change Management, 10(1), pp. 61-77.

Cheating

Cheating is an attempt to deceive assessors, examiners and/or external verifiers. In the context of Academy of Leadership & Management accredited programmes, this may include:

- assistance or the communication of information by one candidate to another in an assessment where this is not permitted
- copying or reading from the work of another student or from another student's books, notes, instruments, computer files or other materials or aids, unless expressly permitted
- offering a bribe of any kind to any person connected with assessment impersonating or trying to impersonate a student, or attempting to procure a third party to impersonate oneself
- fabricating or falsifying data or results by individual students or groups of students

Actions

The Academy of Leadership & Management will allocate a tutor, assessor or other appropriate person to investigate any alleged incidents of:

Plagiarism or Cheating

This includes notifying the student that plagiarism or cheating is suspected, keeping the student updated on progress regarding the investigation, informing them of the outcome and explaining their right to appeal.

Plagiarism and Cheating Policy (continued)

If the outcome of the investigation shows that plagiarism or cheating did occur, a decision will be made as to whether is a determined and deliberate attempt by the student to gain marks for an assignment without having done a substantial portion of the work themselves. If it is a proven incident that will result in the student being withdrawn from the qualification, the Academy of Leadership & Management will inform the awarding body's Head of Quality Practice.

Sanctions for other incidents of plagiarism or cheating could include requiring the student to redo an assignment and, on resubmission, awarding a minimum pass mark.

Actions
If an External Verifier or External Assessor suspects that a student has plagiarised or cheated, he/she will notify the relevant awarding body Quality Manager and refer the incident to the centre for investigation (as above). Awarding body procedures will then apply.

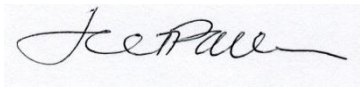
If it is found that there was a major incident of plagiarism or cheating, sanctions include:

- adjusting the marks given for the assessment
- requiring the student to re-do one or more assignments and re-submit for assessment
- refusing to accept further assignments for that student
- withholding full or unit certification
- withdrawing membership
- withholding certification, and withdrawing membership

A student can appeal against the sanctions imposed by the awarding body for plagiarism or cheating by following the Appeals policy which will be provided.

Policy affirmed by: -

John Parker, Director



Janet Parker, Director

June 2021
Review date: June 2022

Policy No.	11	**Update No.**	4	**Issue date**	06/21	**Issued by**	JIP	**Approved by**	JP	**Page no.**	3 of 3

Computer Usage policy

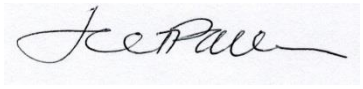
The company's computer systems i.e. all hardware and software belonging or leased to the company, are key tools of its business. All employees are expected to operate within the limits of their personal authorisation to access the system and input or remove data. All employees should inform their manager of any actual or potential breaches of computer security of which they become aware. If an employee intentionally misuses the company's computer systems or software to download offensive or pornographic images for example, they will be subject to the company corrective action procedure and could be summarily dismissed for gross misconduct. Forwarding of offensive or pornographic images or material to colleagues, clients or other personal or business contacts will also be subject to the company's corrective action procedure and could lead to summary dismissal for gross misconduct. It should be noted in these situations, that the definition of "offensive" relates not just to the content of the material in question, but also the recipient's reaction to it.

Personal i.e. non work related internet access in business time should be restricted to lunch breaks etc. Access outwith these times is not normally permissible without the permission of the employee's line manager.

The company reserves the right to screen incoming and outgoing email, internet activity patterns etc. for content and may use monitoring software for these purposes.

Policy affirmed by: -

John Parker, Director



Janet Parker, Director

June 2021
Review date: June 2022

Policy No.	12	**Update No.**	4	**Issue date**	06/21	**Issued by**	JIP	**Approved by**	JP	**Page no.**	1 of 1

Environmental

The directors of **The Academy of Leadership & Management** are committed to minimising the environmental impact of the company's activities via continuous improvement in environmental performance and will seek to develop an ethos of environmental responsibility in all its staff, participants and other stakeholders. The directors recognise that in pursuing our objectives, there is opportunity to protect our immediate environment and by exercising proper control over its activities we will promote the use of sustainable resources and discourage wasteful or damaging practices.

Accordingly, it is our policy to:

- comply with all relevant environmental legislation and take such additional environmental protection measures as it considers necessary.
- promote awareness and understanding of environmental issues among all staff and participants and the external community.
- integrate environmental management policies and practices into every level and every department of the company.
- manage and conserve energy and water efficiently within all premises.
- reduce waste of natural resources, promote waste reduction and recycling and through tendering and purchasing procedures promote sustainable development.
- regulate all waste production and disposal and discourage litter, graffiti and noise pollution.
- reduce and where practicable prevent pollution by avoiding the unnecessary use of hazardous materials and processes and take all possible steps to prevent damage to either public or ecological health where such materials are in essential use.
- promote the use of less environmentally damaging transport options.
- consider the environmental impact of any new development.
- consider the environmental impact of decommissioning and disposal of assets.
- encourage `bottom-up' initiatives to improve environmental performance.
- aim at eventual accreditation to a nationally or internationally recognised environmental management standard as a benchmark of good environmental practice.
- ensure that this policy and all reports and reviews of environmental performance are communicated to all staff and learners and are available to all other interested parties.

Policy affirmed by: -

John Parker, Director
June 2021
Review date: June 2022

Janet Parker, Director

Policy No.	13	Update No.	3	Issue date	06/21	Issued by	JIP	Approved by	JP	Page no.	1 of 1

Whistleblowing and Malpractice

Whistleblowing Policy & Procedure for Centre Staff

A worker for an Awarding Body Approved Centre may decide to make a whistleblowing disclosure to the Awarding Body to prevent harm or to hold an organisation to account.
What is Whistleblowing? Whistleblowing is a term used when an individual discloses information relating to malpractice or wrongdoing and/or the covering up of malpractice or wrongdoing. The malpractice or wrongdoing is often committed by the individual's employer, although this is not necessarily the case. Whistleblowing is distinct from both complaints and employment disputes. A **complaint** is an expression of personal dissatisfaction. An e**mployment dispute** is where a worker has a dispute about his or her own employment position or contract. If you are experiencing such a dispute you should take this up with your employer or another responsible body. Awarding Bodies cannot take action over grievances of this nature.

Any suspected malpractice should be reported to the Awarding Body immediately. Such reporting should follow the relevant Whistleblowing Policy from the Awarding Body.
The Public Interest Disclosure Act If a worker has made a disclosure which is protected under PIDA:

- The worker has the right not to be subject to detriment by his or her employer because of that protected disclosure
- The worker will not breach his or her employment contract in making that protected disclosure

Workers include employees, contractors and members of temporary agency staff and protection under the legislation is a matter between the worker and the employer. Awarding Bodies do not have a formal role in this.
The Content of the Disclosure Protected disclosures can only be made where the information being disclosed tends to show that:

- A criminal offence has been, is being or is likely to be committed
- A person has failed, is failing or is likely to fail to comply with a legal obligation
- A miscarriage of justice has occurred, is occurring or is likely to occur
- The health and safety of an individual has been, is being or is likely to be endangered
- The environment has been, is being or is likely to be damaged
- Information relating to any of the above has been or is likely to be deliberately concealed

Further Requirements for Disclosures to ILM
PIDA gives protection to whistleblowers for disclosures to a number of different people. Disclosures can be made to employers, to legal advisers, to Ministers of the Crown, to a number of prescribed regulators (for certain purposes) and to others in certain circumstances. ILM falls into the 'other' category and is responsible for the maintaining of the integrity and quality of both regulated and non-regulated programmes and qualifications awarded through an Awarding Body.

If a worker makes a disclosure to an Awarding Body, that disclosure may be protected under PIDA if:
• The disclosure is made in good faith
• The worker reasonably believes that the information disclosed, and any allegations he or she makes, are substantially true
• The worker reasonably believes that the disclosure relates to a matter for which ILM is responsible for

But the disclosure will not be a protected disclosure if the worker making it:
• Commits a criminal offence in making it
• Has received the information in the course of providing legal advice (legally privileged information)

What should you do? Normally, you may want to raise your concern with your employer first. If you feel that a concern you have raised internally has not been appropriately addressed or if you feel unable to raise your concerns internally you may want to make a disclosure to someone outside of your organisation.
An example of a whistleblowing disclosure being made to an Awarding Body might include:
• A worker for a centre making a disclosure about that organisation's malpractice or failure to comply with its approved centre status requirements

Centre Staff If you work for a centre, which is delivering Awarding Body programmes, including both regulated and non-regulated programmes, and you wish to make a whistleblowing disclosure to someone outside of your organisation, you should make your disclosure to the Awarding Body..

You may also wish to contact the Regulator and, in these circumstances, you should see the appropriate website for the Regulator for further information regarding how to make a disclosure. Please be aware the Regulator will normally ask the relevant Awarding Organisation to investigate and report on the subject of disclosure in the first instance.

Getting Advice on How Best to Proceed If you are unsure as to how best to proceed, consider doing the following:
Contact Public Concern at Work on 0207 404 6609 or by email at helpline@pcaw.co.uk.

Further information is available at Public Concern at Work's website which you can access at http://www.pcaw.co.uk

Whistleblowing Policy & Procedure for Students

A student undertaking a qualification governed by an awarding Body may decide to make a whistleblowing disclosure to the body, in order to prevent harm or to hold an Approved Centre to account.

What is Whistleblowing? Whistleblowing is a term used when an individual discloses information relating to malpractice or wrongdoing and/or the covering up of malpractice or wrongdoing. The malpractice or wrongdoing is often committed by the individual's employer, although this is not necessarily the case. Whistleblowing is distinct from both complaints and employment disputes. A **complaint** is an expression of personal dissatisfaction. An e**mployment dispute** is where a worker has a dispute about his or her own employment position or contract. If you are experiencing such a dispute you should take this up with your employer or another responsible body. ILM cannot take action over grievances of this nature. Any suspected malpractice should be reported to the Awarding Body immediately. Such reporting should follow the relevant Whistleblowing Policy from the Awarding Body.
The Public Interest Disclosure Act If a student has made a disclosure which is protected under PIDA:
• The student has the right not to be subject to detriment by his or her employer because of that protected disclosure
• The student will not breach his or her employment contract in making that protected disclosure

The Content of the Disclosure Protected disclosures can only be made where the information being disclosed tends to show that:
• A criminal offence has been, is being or is likely to be committed
• A person has failed, is failing or is likely to fail to comply with a legal obligation
• A miscarriage of justice has occurred, is occurring or is likely to occur
• The health and safety of an individual has been, is being or is likely to be endangered
• The environment has been, is being or is likely to be damaged
• Information relating to any of the above has been or is likely to be deliberately concealed

Further Requirements for Disclosures to Awarding Bodies PIDA gives protection to whistleblowers for disclosures to a number of different people. Disclosures can be made to employers, to legal advisers, to Ministers of the Crown, to a number of prescribed regulators (for certain purposes) and to others in certain circumstances. ILM falls into the 'other' category and is responsible for the maintaining of the integrity and quality of both regulated and non-regulated programmes and qualifications awarded under the name of the Awarding Body.

Approach your union or professional body and / or get independent legal advice.
What the Awarding Body will do Individual Awarding Bodies have their own policies, which can be found on their websites or by contacting them direct.. These policies are obliged to set out the course of action ILM will take in responding to and investigating an allegation of suspected malpractice relating to the assessment of its qualifications at approved centres based in the UK or internationally and/or the quality assurance of the assessment process conducted by approved centres.

Contact the Awarding Body Any member of centre staff, learner or other member of the public who suspects assessment malpractice at an approved centre may contact the appropriate contact at the Awarding Body. Details may be found on the Awarding Body websites.

Malpractice

Purpose

This policy applies to all Academy of Leadership and Management (ALM) employees and contracted staff. ALM will take all reasonable steps to prevent the occurrence of any malpractice or maladministration in the development, delivery and award of qualifications which it makes available or proposes to make available. Where it has not been possible to prevent this, it is in everyone's interest to ensure that all cases of suspected or actual malpractice/maladministration are dealt with quickly, thoroughly and effectively.

Introduction

Regulations requires ALM to establish and maintain procedures for dealing with malpractice and maladministration on the part of Learners, ALM staff or any others involved in providing the qualifications, and to take appropriate action to maintain the integrity of qualifications. This document fulfils that requirement.

This document:

- •Defines malpractice and maladministration in the context of delivery and assessments
- •Provides examples as to the types of incidents that may occur
- •Sets out the rights and responsibilities of ALM, ALM approved staff and Learners in relation tosuch matters

Definition of Malpractice and Maladministration

Malpractice

The term malpractice covers any deliberate actions, neglect, default or other practice that compromises, or could compromise:

- The assessment process
- The integrity of a regulated qualification
- The validity of a result or certificate
- The reputation and credibility of our awarding bodies
- The qualification or the wider qualifications community
- The confidentiality of assessment materials

Malpractice may include a range of issues from the failure to maintain appropriate records or systems to the deliberate falsification of records in order to claim certificates.

Maladministration

The term maladministration relates to any activity, neglect, default or other practice that results in ALM or our Learners not complying with the specified requirements for delivery of the qualifications as set out in the relevant codes of practice, where applicable

Types of Malpractice

The following list gives some examples of the types of incident that may occur, the list is not exhaustive:

Centre Malpractice

Examples of Centre malpractice could include:

- Insecure storage of assessment instruments and marking guidance
- Misuse of assessments, including inappropriate adjustments to assessment decisions
- Failure to comply with requirements for accurate and safe retention of Learner evidence, assessment and internal verification records
- Failure to comply with Awarding Body procedures for managing and transferring accurate Learner data
- Excessive direction from assessors to Learners on how to meet national standards
- Deliberate falsification of records in order to claim certificates.

Staff malpractice

Malpractice committed by a current or former ALM member of staff or contractor. It can arise through, for example:

- A breach of security (e.g. failure to keep material secure, tampering with coursework etc.)
- A breach of confidentiality (e.g. failure to maintain confidentiality of assessment materials)
- Deception (e.g. manufacturing evidence of competence, fabricating assessment or internal verification records)
- The provision of improper assistance to Learners (e.g. permitting the use of a reasonable adjustment over and above the extent of permitted Awarding Body policy, prompting Learners in assessments by means of signs or verbal or written prompts)
- Provision of inaccurate or misleading information to Centre staff about qualifications
- Failure to adhere to Awarding Body regulations / stated requirements.

Definition of Malpractice and Maladministration (contd)

Learner Malpractice

Malpractice by a Learner in internal assessment could occur in:

- The compilation of portfolios of internal assessment evidence
- The presentation of practical work
- The preparation and authentication of coursework
- Conduct during an internal assessment
- Conduct during an external assessment.

Examples of Learner malpractice could include:

- Plagiarism - failure to acknowledge sources properly and/or the submission of another person's work as if it were the Learner's own
- Collusion with others when an assessment must be completed by individual Learners
- Copying from another Learner (including using ICT to do so)
- Impersonation - assuming the identity of another Learner or having someone assume your identity during an assessment
- Inclusion of inappropriate, offensive, discriminatory or obscene material in assessment evidence. This includes vulgarity and swearing that is outside of the context of the assessment, or any material of a discriminatory nature (including racism, sexism and homophobia)
- Inappropriate behaviour during an internal assessment that causes disruption to others. This includes shouting and/or aggressive behavior or language and having an unauthorised electronic device that causes a disturbance in the examination room
- Frivolous content - Producing content that is unrelated to the question in scripts or coursework.
- Irrespective of the underlying cause or the people involved, all allegations of malpractice in relation to delivery and assessment need to be investigated in order to protect the integrity of the CMI qualification and to be fair to the Centre and all Learners.

Preventing and Dealing with Malpractice

Roles and Responsibilities

ALM takes its responsibilities in this area very seriously. As such, we have a set of responsibilities that are clearly defined. We also acknowledge the responsibilities placed upon our Awarding Bodies and have reproduced them here.

Academy of Leadership and Management

ALM approved staff and contractors are responsible for:
Immediately notifying our Awarding Bodies of any incidents, or suspected incidents, of malpractice/maladministration as required by Awarding Body policies
Complying with published Awarding Body malpractice procedures
Taking reasonable steps to prevent malpractice/ maladministration from arising
Advising Learners of the Awarding Body policy on malpractice/maladministration during their induction
Being vigilant to possible instances of malpractice and maladministration
Assisting with any Awarding Body requests for information
Co-operating with Awarding Body malpractice/maladministration investigations
Carrying out investigations of malpractice under the guidance of the appropriate Awarding Body
Implementing any actions required during and after investigation into a case of malpractice
Taking action required to prevent the recurrence of malpractice/maladministration.

Awarding Bodies

Our Awarding Bodies are responsible for:

- Taking all reasonable steps to prevent any malpractice or maladministration
- Ensuring it has written up to date procedures in place for the investigation of suspected or alleged malpractice or maladministration
- Carrying out or overseeing investigations of cases (or suspected cases) of malpractice/maladministration to establish whether it has occurred
- Promptly taking all reasonable steps to prevent (or mitigate) any adverse effects arising from the malpractice/maladministration
- Keeping under review Centre arrangements for preventing and investigating malpractice and maladministration
- Providing guidance to Centres (upon request) as to how best to prevent, investigate, and deal with malpractice and maladministration
- Taking steps to prevent any malpractice or maladministration from recurring
- Taking appropriate and proportionate action against those who are responsible for the malpractice/maladministration
- Applying appropriate sanctions in line with its published sanctions policy
- Informing Centres and other Awarding Bodies of the malpractice/maladministration, as appropriate
- In cases where there is the potential for an Adverse Effect or strong grounds for suspected malpractice and maladministration the regulators will be notified immediately
- Reporting the matter to the police, where they believe a criminal act has been committed, (especially where the malpractice has led to fraud).

Policy affirmed by: -

John Parker, Director

Janet Parker, Director

June 2021
Review date: June 2022

Policy No.	14	Update No.	2	Issue date	06/21	Issued by	JIP	Approved by	JP	Page no.	8 of

Privacy

The Academy of Leadership & Management is committed to data security and the fair and transparent processing of personal data. This privacy policy sets out how we collect, use, disclose, transfer, and store your personal information.
Please read this Policy carefully as it contains important information on:
- who we are, how and why we collect, store, use and share your personal data
- your rights in relation to your personal data
- how to contact us
- how to contact supervisory authorities in the event that you would like to report a concern about the way in which we process your personal data

Who we are
In this privacy policy references to *we*, *us* and *our* are to The Academy of Leadership & Management. References to *our Website* or *the Website* are to www.academylm.co.uk.
References to our *Virtual Learning Environment* are to our online learning platforms, or those that we are contracted to manage on behalf of clients.
For the purposes of the General Data Protection Regulation (Regulation (EU) 2016/679) (GDPR), The Academy of Leadership & Management is a 'controller' and 'processor' of learner personal data. The Academy of Leadership & Management is a private limited company, registered number SC402385. Our registered address is 24 Sandyford Place, Glasgow, G3 7NG.
The Academy of Leadership & Management provides, learning, training and certification products and services in relation to leadership and management and other related subject areas. If you have any queries about this policy, the way in which we process personal data, or about exercising any of your rights, you may contact our Privacy Officer by sending an email to info@academylm.co.uk or writing to Privacy Officer, The Academy of Leadership & Management, 24, Sandyford Place, Glasgow G3 7NG.

What personal data do we collect? When you register for a product or service from us e.g. a training course, we will normally collect the following information:

- Name – first name and surname
- Date of birth
- Gender
- Residential address
- Email address
- Telephone number
- Employer name and address

We may also collect other categories of personal data if required in relation to a specific qualifications, courses or products if required to carry our assessment, quality assurance processes, investigations, complaints and appeals. This personal data is provided to us in order for you to receive learning, training, and certification products and services provided by us.

In exceptional circumstances, we may collect sensitive personal data, such as information about your health, to enable us to administer requests for adjustments in relation to your learning and assessment where requested, or relating to an investigation, complaint, or appeal. Such information will only be provided to the awarding body that accredits or regulates your course or qualification if you have given your explicit consent.
When you visit our Virtual Learning Environment, we receive information about you in two ways:
Automatically: This includes your IP address and browsing behaviour.
Directly from you: This is usually your contact details and any other information you provide as part of your participation on a course or other learning product. We use this information to manage your learning, assessment and training on courses in which you are participating and to provide you with information, products or services that relate to your learning, where you have agreed to be contacted for such purposes.
We may also collect and process personal data if you:
 complete a form on our Website;
 complete a survey;
 correspond with us by phone, e-mail, or in writing;
 report a problem;
 sign up to receive our communications;
 enter into a contract with us to receive products and/or services,

This will normally include your name, e-mail address, postal address, telephone number and job role. If you visit our Website, we may automatically collect the following information:
 technical information, including the internet protocol (IP) address used to connect your computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 information about your visit to our Website such as the products and/or services you searched for and view, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

Information about other people If you provide information to us about any person other than yourself, such as your employer, your advisers or your suppliers, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.
Sensitive personal data In certain limited cases, we may collect certain sensitive personal data from you. However, we will only do so by explaining the reason why and on the basis of your explicit consent.

How do we use your personal data? When we ask you to supply us with personal data we will make it clear whether the personal data we are asking for must be supplied so that we can provide the products and services to you, or whether the supply of any personal data we ask for is optional.

Contract performance: We may use your personal data to fulfil a contract, or take steps linked to a contract:

- to provide the products and/or services for which you have registered
- to communicate with you in relation to the provision of the contracted products and services;
- to undertake assessment, quality assurance and administration in relation to the contracted products and services
- assess and provide reasonable adjustments in relation to your learning and assessment where requested
- provide you with a certificate, credential or other record of learning
- contact you directly in relation to our quality assurance processes, investigations, appeals and complaints
- provide you with information about events, offers and promotions, related to the products and/or services.

Legitimate interests: Where this is necessary for purposes which are in our, or third parties' legitimate interests. These interests are:

- providing you with newsletters, surveys, information, offers, and promotions, related to products and which may be of interest to you;
- communicating with you in relation to any issues, complaints, or disputes;
- performing analytics on sales/marketing data, determining the effectiveness of promotional campaigns.

You have the right to object to the processing of your personal data on the basis of legitimate interests as set out below, under the heading Your Rights.

Consent: where you have given your express consent to receive marketing communications, we may use your personal data to:

- providing you with newsletters, surveys, information, offers, and promotions, related to products and which may be of interest to you
- developing, improving, and delivering marketing and advertising for products and services offered by the Academy of Leadership & Management.

Where required by law: we may also process your personal data if required by law, including responding to requests by government or law enforcement authorities, or for the prevention of crime or fraud.

Who do we share your personal data with? We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations.

We may also share your personal data with trusted third parties including:
 service providers contracted to us in connection with provision of the products and services such as providers of IT services and customer relationship management services; and
 the body that accredits or regulates your course or qualification.
 The Institute of Leadership & Management (TILM) to enable TILM to offer you student membership in relation to leadership and management. You can find out more about TILM at http://www.institutelm.com
 service providers contracted to us in connection with provision of learning, assessment, and training products and services such as markers, moderators, assessors, certification or credentialing providers, IT services and customer relationship management services; and
 analytics and search engine providers that assist us in the improvement and optimisation of our Website.

Where a third party recipient is located outside the European Economic Area, we will ensure that the transfer of personal data will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the European Commission where the data protection authority does not believe that the third country has adequate data protection laws. We may also share personal data with law enforcement or other authorities if required by applicable law.

How long will we keep your personal data?

Where there is a contract between us, we will retain your personal data for the duration of the contract, and for a period of seven years following its termination or expiry, to ensure that we are able to comply with any contractual, legal, audit and other regulatory requirements, or any orders from competent courts or authorities. Where you have consented to marketing communications, you may change your preferences or unsubscribe from marketing communications at any time by clicking the unsubscribe link in an email from us.

Your rights

Under the GDPR, you have various rights with respect to our use of your personal data:

Right to Access You have the right to request a copy of the personal data that we hold about you by contacting us at the email or postal address given below. Please include with your request information that will enable us to verify your identity. We will respond with 30 days of request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing such information. Or if your request is manifestly unfounded or excessive.

Right to rectification We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up to date.

Right to erasure You have the right to request the deletion of your personal data where, for example, it is no longer necessary for the purposes for which it was collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using the contact details provided below.

Right to object In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data, or if your data is being processed for direct marketing purposes. If you would like to object to the pressing of your personal data, please contact us using the contact details provided below.

Right to restrict processing In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have contested the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted. Please contact us using the contact details provided below.

Right to data portability In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. If you would like to request that your personal data is ported to you, please contact us using the contact details provided below.
Please note that the GDPR sets out exceptions to these rights. If we are unable to comply with your request due to an exception we will explain this to you in our response.

Unsubscribing

You may unsubscribe from marketing communications at any time by contacting us at info@academylm.co.uk or by using the 'unsubscribe' functionality on any marketing communication sent to you.

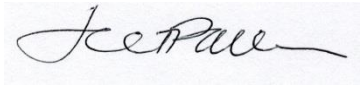
Contact

If you have any queries about this Policy, the way in which The Academy of Leadership & Management processes personal data, or about exercising any of your rights, you can contact our Privacy Officer by sending an email to info@academylm.co.uk or by writing to Privacy Officer, The Academy of Leadership & Management, 24, Sandyford Place, Glasgow G3 7NG. Our telephone number is 0845 890 2549.

If you believe that your data protection rights may have been breached, and we have been unable to resolve your concern, you may lodge a complaint the applicable supervisory authority or to seek a remedy through the courts. Please visit https://ico.org.uk/concerns/ for more information on how to report a concern to the UK Information Commissioner's Office.

Policy affirmed by: -

John Parker, Director



Janet Parker, Director

June 2021
Review date: June 2022

Policy No.	15	**Update No.**	4	**Issue date**	06/21	**Issued by**	JIP	**Approved by**	JP	**Page no.**	6 of 6

Conflicts of Interest

Tutors, Coaches, Assessors & Internal Verifiers
This document provides guidance on the principles and procedures for managing conflicts of interest within The Academy of Leadership & Management's (ALM) approved awarding centre.

It is the policy of ALM that tutors, coaches, assessors and internal verifiers acting on behalf of the ALM awarding centre for any of the above awarding organisations must be free from conflicts of interest that could adversely affect their judgement or objectivity to the organisation in conducting business activities and assignments. ALM recognises that tutors, coaches, assessors and internal verifiers may take part in legitimate financial, business, charitable and other activities outside of the ALM approved centre, but any potential conflict of interest raised by those activities must be acknowledged, disclosed, and in relevant cases properly managed.

It is the responsibility of each individual to recognise situations in which they have a conflict of interest, or might reasonably be seen by others to have a conflict; to disclose this conflict and to take such further steps as may be appropriate and set out in more detail under the procedure below.

Definitions
A conflict of interest may generally be defined as a conflict between the official responsibilities of a tutor, assessor, coach or internal verifier and any other interests the particular individual may have and as such could compromise or appear to compromise their decisions.

Condition A4 in the Ofqual General Conditions of Recognition 2016 states that a conflict of interest exists in relation to an awarding organisation where:

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

Examples of conflict of interest
It is not possible to provide a definitive list of examples of conflicts of interests, but the following are examples of situations that could lead to conflicts of interest:

- Tutors, coaches, assessors and internal verifiers working with a business outside of
- the ALM awarding centre that is in direct competition with ALM
- Tutors, coaches, assessors and internal verifiers involved in the ALM awarding
- centre approval processes who own business consultancies offering ILM
- qualifications or programmes
- Tutors, coaches, assessors and internal verifiers participating in the appointment,
- promotion, supervision or evaluation of a person with whom the person has close or
- familial ties
- Tutors, coaches, assessors and internal verifiers having a close or familial
- relationship with an ALM registered learner, or learners' family whilst being involved
- in decisions about the outcome of their qualification

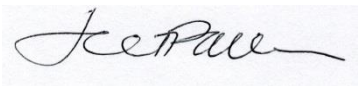
The existence of such interests as those outlined above, does not necessarily imply conflict, but is likely to give an appearance of conflict and as such should be declared.

Process
It is the duty of all tutors, coaches, assessors and internal verifiers to disclose any actual or potential conflict of interest. The process for doing this is documented below:

- All tutors, coaches, assessors and internal verifiers are issued with a conflict of
- interest form to complete on commencement with the organisation and it is a
- requirement of their contract that this is completed and updated on an annual basis.
- The information held on the conflict of interest form is then transferred to a register
- of interests document which is maintained by a designated member of ALM staff
- If the individual concerned has any changes to their declared circumstances, they
- must inform the ALM Head of Centre (John Parker) immediately in writing, so that
- the conflict of interest can be evaluated, and the register updated
- The form is to be completed even when the individual has no conflict of interest to
- declare
- The information submitted is then evaluated to identify if any further action is
- required and a written record of the outcome of the evaluation is kept.

Action
Most situations require no further action than the completion of the conflict of interest form. In some instances, however, the information declared on the form will require some follow up action, in order for the conflict of interest to be managed appropriately. The approach agreed between the Head of Centre and the tutor, coach, assessor or internal verifier will be documented and held in the centre.
Policy affirmed by: -

John Parker, Director



Janet Parker, Director

June 2021
Review date: June 2022

Safeguarding

The Academy of Leadership and Management is committed to the application of safeguarding and this policy and its associated procedures apply to all staff, non-executive post-holders and associates. In addition to the overarching safeguarding policy and approach adopted by The Academy of Leadership and Management this policy and associated procedure also identifies specific matters relevant to external recruitment activity and Learning activity provided by The Academy of Leadership and Management.

Our commitment

The Academy of Leadership and Management is committed to safeguarding the interests of children, young people and vulnerable adults and to the promotion of their welfare and protection. We expect all staff and associates to share this commitment and to ensure application of this Safeguarding Policy within all situations where activity involves contact with children, young people and vulnerable adults.

The Academy of Leadership and Management aims to safeguard children and vulnerable adults by:

- Valuing, listening to and respecting them
- Maintaining policies, procedures and codes of conduct (where applicable) for staff and representatives
- Recruiting representatives safely by ensuring all necessary checks are made in line with currentgovernment guidance and legislation
- Updating staff, associates and other representatives on relevant policies and procedures and providingaccess to relevant information
- Respecting confidentiality whilst sharing information about concerns with agencies who need to know
- Providing effective support and management for staff and representatives

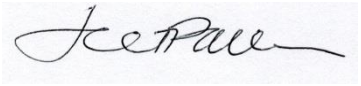
General application of policies and procedures

The Academy of Leadership and Management and all its people will:

- ensure that the organisation operates safe and fair selection procedures which are regularly reviewed and up-dated to reflect any changes to legislation and statutory guidance;
- promote the safety and wellbeing of children, young people and vulnerable adults at every stage of relevant activities;
- ensure that recruitment processes include appropriate checks; and
- monitor relevant contractors and associates compliance with this document and related requirements.
- Operate in line with procedures in place and agreed by the directors and with current legislation.

Policy affirmed by: -

John Parker, Director



Janet Parker, Director

June 2021
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Complaints

A complaint is an expression of dissatisfaction from you about our products, services or the complaints handling process where it is clear that you expect us to identify the cause of the problem and to take some kind of remedial action.

We aim to ensure that:

- making a complaint is as easy as possible
- we treat a complaint as a clear expression of dissatisfaction with our service which calls for an immediate response
- we deal with it promptly, politely and, when appropriate, confidentially
- we respond in the right way, for example, by giving you an explanation or an apology where we have got things wrong, and letting you know what action we've taken
- we learn from complaints and feedback and we use them to improve our service.

It is not possible to provide a definitive list of examples of complaints, but the following are examples of situations that would constitute a complaint:

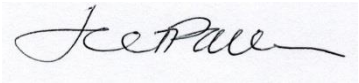
- the quality or management of our training programmes
- undue delay or non-compliance with published procedures, including certification
- poor administration, including lack of response to queries
- equality and diversity issues
- health and safety concerns (unless these are matters for the Health and Safety Executive)
- website and eLearning issues
- delay in certification or receipt of certificates

Separate procedures apply in regard to:

- assessment appeals
- maladministration / malpractice (whistleblowing)

Policy affirmed by: -

John Parker, Director



Janet Parker, Director

June 2021
Review date: June 2022

Policy No.	18	Update No.	2	Issue date	06/21	Issued by	JIP	Approved by	JP	Page no.	1 of 1

Prevent

Introduction

The purpose of this Policy is to provide everyone connected to The Academy of Leadership and Management (ALM) with a clear outline of our position with respect to the safeguarding of learners and staff under the Prevent Duty.

Prevent is a strand of the Government's counter-terrorism strategy CONTEST. ALM is, via its levels of engagement with learners of all ages and from a variety of cultural and ethnic backgrounds, able to contribute towards the aim of preventing individuals from being drawn into terrorism or extreme violence.
As an education and training provider, ALM has a statutory duty to prevent people being drawn into terrorism under the Counter-Terrorism and Security Act (2015).
Objectives
As part of ALM's approach to Safeguarding, Equality and Diversity and the promotion of fundamental British values, we will:

- Promote fundamental British values by ensuring that there is a culture of openness within our delivery and team and the opportunity for learners to explore what this means to them.
- Challenge segregation, promoting cohesion and building learner resilience with the aim of our learners and staff contributing actively to wider society.
- Operate a clear and consistent anti-bullying approach which challenges harassment and discrimination and enables learners and staff to feel safe and supported.
- Provide support, advice and guidance for learners and staff who may be at risk or radicalisation. This may include referral to Channel, the process by which multi-agency support is provided to individuals who are at risk of being drawn into terrorism.
- Ensure that staff, learners and employers are aware of their roles and responsibilities in preventing radicalisation and extremism.
- Have a leadership team which actively promotes the core values of shared responsibility and well-being for learners, and staff ensure that these are at the heart of everything that we do.

- ALM's Designated Safeguarding Lead (DSL) is the companies Prevent Officer.
- Deputy Designated Persons (DSP) will deputise in the DSL's absence.
- The DSL and the DSPs are responsible for making all decisions regarding referrals to Local

Prevent (cont)

Responsibilities

- ALM's Designated Safeguarding Lead (DSL) is the companies Prevent Officer.
- Deputy Designated Persons (DSP) will deputise in the DSL's absence.
- The DSL and the DSPs are responsible for making all decisions regarding referrals to Local
- All staff should be vigilant to extremist behaviour as a wider part of their safeguarding duties and report their concerns to the DSL or DSP in line with our wider safeguarding procedures.
- Learner facing staff will deliver learning and assessment which reflects fundamental British values.
- We will seek to actively safeguard all learners and provide welfare support at the point of need for learners identified to be at risk of harm as defined within Keeping Children Safe in Education (2015).
- We will implement anti-bullying strategies and challenge discriminatory behaviour. § We will respond to identified community needs.
- We will actively narrow the achievement gap between different groups of learners.
- We will promote a culture of vigilance and operate a whistleblowing blowing procedure which includes reference to the Prevent agenda.

ICT Use and Monitoring

IT equipment provided to both staff and learners is subject to monitoring. In addition to monitoring filters are applied to ALM systems which will restrict access to harmful content. A log will be kept and reviewed to enable patterns of inappropriate access to be identified and challenged. This log will be overseen by the Head of IT.

Staff identifying inappropriate use will report this to the DSL or DSP to enable this to be investigated for safeguarding purposes.

ALM operates an E safety policy which reflects the requirements placed upon us by the Prevent Duty.

Prevent (cont)

Risk

We will ensure that there is a shared understanding amongst staff and learners as to the risks posed within the training environment by extremist behaviour by raising awareness through training and information sharing.

Steps will be taken to mitigate the risk posed to staff/learners by individuals vulnerable to radicalisation on a case by case basis.

Referrals to Channel will be made on a case by case basis and with consideration being made to the need for a multi-agency approach in advance of any referrals.

We will operate a critical incident management plan in dealing with terrorist related incidents. This will form part of our Disaster Recovery Plan.

We will ensure that there are plans in place which respond to any direct threats within our buildings.

We will develop effective ILT policies which promote responsible use as well as seek to monitor usage.

Risk assessments will be undertaken on any external speakers and clear guidance will be issued as to levels of acceptable behaviour whilst on site. Where available, scripts will be approved before delivery to ensure that the content is consistent with fundamental British values and our approach to safeguarding.

All display materials, including externally produced leaflets and posters, will promote fundamental British values and have due consideration to the Equality Act. We will seek to promote this ethos within employer premises.

ALM will only promote its services within organisations that share its values for the need to safeguard, promote equality and prevent extremist behaviour. Where required risk assessments will be undertaken to consider the appropriateness of venues before agreements are made to provide information and advice to individuals within that organisation.

The culture of vigilance extends to our external relationships. Where employers with whom ALM is engaged are found to be either in breach of the Equality Act or advocating extremist views or behaviour this will be addressed as a Safeguarding issue by the DSL/DSP.

Prevent (cont)

Awareness and Training

The DSL and the DSPs will complete a Workshop to Raise Awareness of Prevent (WRAP).

Leaders and Managers will undertake Prevent for Leaders and Managers eLearning provided by Foundation on-line.

Learner facing staff will undertake WRAP (or the equivalent eLearning).

Staff in support functions will undertake Prevent for Support staff eLearning provided by Foundation online.

Mandatory Safeguarding Training will equip staff with the ability to recognise signs that a learner or colleague might be on the path to becoming radicalised and outline the process by which concerns should be raised.

All training will be refreshed on a three yearly basis or as required by legislation.

ALM will actively promote our Prevent Duty to staff and learners alike.

Policy affirmed by: -

John Parker, Director

Janet Parker, Director

June 2021
Review date: June 2022

Apprenticeships

The Commitment of the Academy of Leadership and Management

The Academy of Leadership and Management, (ALM), is fully committed to all aspects of apprenticeship provision. In particular:

- **General**
  ALM commits to supporting the concept, delivery and growth of apprenticeships, in whatever format, through our own provision and the support and active encouragement of others where appropriate, including, but not limited to, other providers, Ofsted and central and regional authorities as are, from time to time, responsible for strategic delivery. We commit to maintaining the highest quality of provision in line with our policies and procedures and to maintain a continuous improvement ethos, as is the case with all our other programmes.

- **Policies**
  ALM commits to meeting the requirements of all policies and processes as required from time to time by apprenticeship authorities, Ofsted and other agencies that have authority over provision.

- **People**
  ALM commits to providing high quality, appropriately trained and committed personnel for the provision of apprenticeships, in line with the maximum ratio of learners agreed in contracts with the ESFA and employers.

- **Provision**
  ALM commits to provide learning and assessment against the standards required by the apprenticeship standards being delivered. We commit to overseeing the minimum 20% requirements, maintaining appropriate records and allowing full access for external quality assurance arrangements by both Ofsted and awarding bodies as required.

- **Commitments to learners and employers**
  ALM commits to completion of the Commitment Statement, in line with the template provided by ESFA, covering Key Policies, Commitment to Programme and Plan of Training. In addition, we commit to providing each learner with an Individual Learning Plan, which will be updated regularly in line with the requirements of the standards and reported on to employer line management.

- **Commitment to End Point Assessment**
  ALM commits to supporting all learners through to entry to End Point Assessment and to providing them with the best possible opportunity to achieve a positive outcome in the process.

Apprenticeships (cont[d])

Continuity

The Academy of Leadership and Management, (ALM), is fully committed to maintaining continuity of provision for all apprenticeship programmes. Each programme will have a Continuation of Provision Plan prepared at its start, completed by the Lead Tutor and Operations Director and maintained by the learner management team. The plan will include sections on Information Technology, (IT), Personnel, Premises, Transport and Other.

Information technologies

ALM maintains a clear IT continuity policy designed to enable us to continue provision. We contract to two key agencies in this regard.

Certum are a large provider of IT infrastructure and they provide our cloud services, offline secure data storage, hardware and hardware support and ongoing IT support. They can be contacted through multiple media, both online and telephone based and provide a 1-hour response commitment. They link into Microsoft 365 data server, meaning the highest quality of provision, security and continuity of supply.

e-Learn Design are a well-established provider of elearning platforms through their Moodle servers. They have two sets of servers, each mirroring each other, meaning that, even if a catastrophic failure occurs in one set, the other can be brought online very quickly. These servers have high levels of security certified.

ALM maintains reserve technology to substitute for breakdowns.

Personnel

ALM has a fully trained team for Management, Delivery and Administration of programmes. Apprenticeships form an important element of our provision and we also provide other programmes, at the highest levels. We have a full set of procedures and materials, based around our Moodle Virtual Learning Environment. This means that we have trained and quality assured people, working flexibly, who can step into programme provision at very short notice if required, using our clear procedures and materials.

Premises

ALM commits to identifying premises for continuity of provision, should there be a catastrophic or temporary reason for being unable to use the facilities allocated specific programmes.

Apprenticeships (cont[d])

Continuity (cont[d])

Transport

ALM commits to providing transport arrangements from facilities that are not useable to those substituted for delivery at no cost to learners. This transport will be provided until the facilities have been restored or, in the case of catastrophic occurrences, until a new set of premises local to the original have been identified.

Other

Programme leaders will complete a risk assessment at the start of each programme and will note the outcomes and requirements within the Continuity Plan.

Policy affirmed by: -

John Parker, Director

Janet Parker, Director

December 2021
Review date: June 2022