

# TOLLEY EXAM TRAINING

# STUDENT HANDBOOK

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Tolley®

Tax intelligence  
from LexisNexis®



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## Welcome and Introduction

Welcome to your Tolley Exam Training Student Handbook.

This handbook has been designed to provide an introduction to your Tax Training Programme and outlines the key policies that apply whilst you are studying with Tolley. Tolley Senior Leadership Team are accountable for the implementation, review and reporting of progress of all policies in this handbook.

Tolley works in conjunction with your employer to deliver your Tax Training Programme, which is designed to give you the tax technical knowledge to develop in your current role. The Tax Training programme compliments any additional training organised and delivered by your employer.

### About Us

Tolley is the tax business of LexisNexis. We are the UK's only provider of practical tax guidance, in-depth reference material, ground-breaking training and learning resources and unique market insight.

Established in 1916, when Charles Tolley created the world's first tax tables, Tolley has a long-established history of working in partnership with the profession to facilitate an adherence to best practice and deliver financial efficiencies.

At Tolley, we have four product families designed for tax advisors working on the Front Line:

**Tolley Guidance** is our online service for tax professionals. Designed to provide practical and relevant tax information, from practice notes and legislation through to pro-forma documents and bite-sized video lectures.

**Tolley Library** contains all consolidated UK tax legislation alongside accountancy standards and principles. It is the most up-to-date source of UK tax cases, hosts all the HMRC materials in an easily accessible format and hosts the full breadth and depth of Tolley's eminent commentary and analysis.

**Tolley Exam Training** is a suite of ground-breaking training products delivered at a variety of levels. Our ATT (Association of Taxation Technicians) and CTA (Chartered Tax Adviser) pass rates far exceed the national average and we are the exclusive provider of training for ICAS Tax Professional (ITP) qualification.

**Tolley CPD / Development** brings critical news and analysis about the ever-changing face of tax through leading titles such as Taxation Magazine and Tax Journal, as well as delivering market leading continuous professional development (CPD) services (both online and face-to-face).

### Tolley Tax Training Programme

Our Tax Training Programme has been set up to reflect the Tolley values of:

#### Customer Focus

Everything we do is driven by our customers' needs. We want to be their indispensable partner. We have a passion for understanding and exceeding our customers' expectations. We are committed to providing demonstrably superior products and services with the highest level of quality and excellence. We are professional in all customer dealings. We are highly valued and respected by our customers.

### Valuing Our People

We put the highest priority on recruiting, developing, and retaining outstanding people. Our managers are directly responsible for the development of their people. We recognize and reward achievement. We enjoy what we do and we celebrate success. We empower our people to maximize their potential contribution. We respect our people and believe in open and honest communication. We behave in an ethical and principled manner.

### Passion for Winning

We are determined to outperform and beat the competition. We always want to be the best. We are a high energy, fast moving, decisive organisation. We have a strong propensity for action. We always execute well and deliver. We set aggressive goals and strive to beat them. We hold ourselves and each other accountable for outstanding results.

### Innovation

We welcome and push change; we challenge the status quo. We encourage our people to be entrepreneurial, take some risks and learn from mistakes. We are ready to make bold moves and decisions. We constantly look for new ideas and value 'out-of-the-box' thinking. We keep things simple and minimize bureaucracy.

### Boundarylessness

We welcome the global nature of our business and encourage people to work collaboratively across business units, hierarchy, and functions. We constantly strive to break down barriers between organisations. Our people are supportive of each other. We seek partnerships with customers and suppliers.

We hope you enjoy your studies with us and we will do everything we can to ensure you are successful. If you have any queries or comments about your Tax Training Programme feel free to get in touch using the **Key Tolley Contacts Information** at the end of this handbook.

Best Wishes,



Simon Groom  
Director of Tolley Learning

## Definitions

**Client Services** – Tolley Learning Client Service Team based in London and responsible for all student enrolment and administration throughout the Tax Training Programme

**Director of Tolley Learning** - Member of the Senior Leadership Team with direct responsibility for the Tolley Exam Training business

**Employer** – Organisation employing the student

**Senior Leadership Team** - Management team responsible for the Tolley business, led by the Director of Tax Markets

**Tax Training Programme** – Entire journey the student or apprentice has with Tolley Exam Training leading to the qualification/Apprenticeship Standard. The Tax Training Programme therefore covers all interactions a Tutor may have with the student

**Tolley** - Division of RELX (UK) Limited providing tax publishing, CPD and exam training services. All references to Tolley should be taken to also include LexisNexis and RELX (UK) Ltd

**Tutors** - Tutors employed by, and freelance Tutors engaged by, Tolley for the delivery of the Tax Training Programme

# Employer Engagement Policy

## Introduction

Tolley recognises the importance of delivering a range of comprehensive services to our employers in a way that meets their individual needs and provides consistent value for money. Tolley Learning has been working with employers for many years by providing bespoke training and tax qualification programmes.

Working with employers, we continuously evolve our services to adapt to employer requirements. We strive to ensure our services are relevant, well delivered and represent a good investment for our employers. Successful employer engagement means regular consultation and communication and excellent support by all members of the team.

Since 2017 Tolley Learning has also been offering Apprenticeships and is on the Register of Apprenticeship Training Providers (RoATP) as a Main Provider involved in the delivery of the following Government approved Standards:

- Level 4 Professional Accounting/Taxation Technician; and
- Level 7 Accountancy/Taxation Professional

These standards map to the ATT and CTA exams respectively and are recognised as delivering the 'knowledge' module of an Apprenticeship programme. As such Apprentices may attend classes in any location and will learn alongside non-Apprentices.

Tolley continues to engage with employers on a commercial basis (non-apprentices) but increasingly Employers are employing more students as Apprentices.

## Culture, Attitudes and Behaviours

At Tolley, we aim to create a professional and supportive environment and one which focuses on providing excellent service to employers. Tolley ensures that:

- Directors and managers are fully committed to delivering employer service excellence
- All tutors and employer service staff are empowered to deliver service excellence
- All tutors and staff understand and recognise who our employers are and put the needs of the employer at the heart of everything they do
- We will involve ourselves in the communities that we support and engage ourselves in a range of non-work community initiatives

## Employer communications

Effective communication (both internal and external) is an essential element of employer service excellence. To this end we will:

- Provide information to employers to support and develop their understanding of the services that are available to them
- Adopt innovative techniques and new technologies to provide both employers and staff with practical and modern solutions to service delivery.

- Ensure that we liaise with all members of the professional community, employers and other stakeholders and embed the principles of the equality and diversity in all our activities. In communicating and interacting with employers we will consider a range of different needs, including language, disability and other considerations. We will ensure that our services are designed to respect cultural and community diversity and be anti-discriminatory.
- Ensure that employers are given the opportunity to feel involved and listened to. We will actively listen to employers, collect their feedback and make changes to our programmes in response to their comments.
- Consider all forms of feedback such as employer complaints, comments and compliments and incorporate these into its decision-making process. Feedback will be passed to staff at all levels to ensure that they are employer focused and constantly thinking about and anticipating employer requirements.
- Measure and report on performance regularly based on what is important to employers. We will use Tolley Academy to capture all information and provide access to employers on a real-time basis.

### Developing programmes with Employers

Our business is secured through a combination of existing relationships and new enquiries.

Existing relationships are managed as follows:

- National: Chris Siddle, Head of Client Relations
- Birmingham: Duncan Harvey, Senior tutor
- Manchester: Karen Bullen, Senior Tutor
- Bristol: Liz Halford, Head of Learning Resources

New enquiries will be received by the Client Service team and either dealt with by the team where Employer is small and straightforward, or passed to the appropriate senior tutor as listed above where the Employer is mid-market/large and require a bespoke programme.

Enquiries requiring escalation can be referred to Simon Groom, Director of Tolley Learning or Victoria Davies, Director of Tax Apprenticeships.

In all cases we will work with employers to develop the best programme to meet their training needs and those of their students. This may be on a commercial basis or through an Apprenticeship programme.

Where there is a need to deliver in partnership with another provider, for example where an employer wishes their apprentices to undertake both the accountancy and the tax pathways of the apprenticeship standards, then we are happy to do so. We work with two other Main Providers: BPP and First Intuition. We will be flexible in discussions with employers and offer all alternatives. When explaining what is involved in an Apprenticeship we must ensure that the Employer fully understands their role and the time commitment required. In some cases, it may be more appropriate to work with them on a commercial basis and not through an Apprenticeship programme.

### Promotion of Apprenticeship Programme

We actively promote the Apprenticeship programme alongside all other Tolley products. Information on the programme is included in our Tolley Learning brochure and on our website. First Intuition and BPP will also promote our services in discussions with employers where appropriate.

We currently, through our Main providers, promote our apprenticeship programme, through the FATP website. We are intending to promote ourselves in our own right from September 2019.

### **Delivering training to Employers**

All students (apprentices and non-apprentices) will be managed through Tolley Academy and will largely follow the same procedure. For Apprentices, there will be additional administration requirements together with the delivery of the Skills and Behaviour programme, and in some cases, functional skills.

The day to day responsibility for managing Apprenticeship administration lies with the Apprenticeship Manager, who will liaise with the Employer Service Team, tutors and coaches as appropriate. All other students will be managed by the Employer Service Team.

All activity will be recorded through Tolley Academy.

### **Employer Account Management**

Account management is the responsibility of the Head of Employer Relations and team. National accounts will be managed by the Head of Employer Relations. In some cases, a dedicated senior tutor may also be allocated to the employer as additional support. Regional leaders will be responsible for managing regional accounts.

We will adopt a variety of techniques to communicate with employers and manage their account. These will vary from employer to employer and will be designed to fit with the culture and techniques favoured by our employers. These will include:

- Consultation with employers and interested groups when designing our services at the outset of contracts
- Frequent meetings with employers to ensure that we are meeting or exceeding expectations
- Internal meetings with tutors and the employer service team to collate feedback, experience and anecdotal feedback
- Surveys with students and employers

In addition, for apprentices the Apprenticeship Manager will monitor their performance and flag any concerns directly as soon as they are identified.

All Employer training managers will be given 'Training Manager' access to Tolley Academy so that they can also monitor their student progress on a real-time basis.

# Equality and Diversity Policy

## Introduction

Tolley recognises it is essential to provide equal opportunities to all without discriminating, and we are committed to encouraging equality and diversity, and eliminating unlawful discrimination.

This policy sets out Tolley's intention to deliver a range of qualifications and learning outcomes that are fair, accessible and do not include any unnecessary barriers to entry. This includes our apprenticeship programmes.

## Our responsibility

All Tolley staff involved in the delivery of apprenticeships and qualifications to learners and apprentices are fully aware of the contents of the policy. This is done through training during their induction into the company, and periodically afterwards by way of refresher training. .

## Review arrangements

The Director of Tax Apprenticeships will review the policy annually and revise it as and when necessary in response to employer and learner feedback, changes in our practices, actions from the regulatory authorities or external agencies (e.g.ESFA) or changes in legislation.

## Areas covered by the policy

- **Staff**

We commit to incorporating specific and appropriate duties in respect of implementing the equal opportunities policy into job descriptions and work objectives of all staff.

We will provide equality training and guidance as appropriate to our staff; including as part of their induction training. In addition, we will provide further on-going courses as identified via our internal staff performance review arrangements.

- **Apprenticeship Delivery**

We will ensure through a comprehensive initial assessment of all learners that all specific individual needs are taken into account when preparing the delivery programme for each apprentice. We will, as far as is reasonably practical, ensure fair and equal access to all apprentices to each of the apprenticeship standards that we offer. We will ensure that there are no features contained in course materials or the delivery of those materials that will disadvantage any individual or groups of learners.

- **Qualification Development**

We will ensure that there are no features of our apprenticeship delivery, irrespective of which apprenticeship standard, that could disadvantage any groups of learners or apprentices that share a particular characteristic or barriers to entry other than those directly related to the purpose of the units or qualifications. The nature of any such features or barriers will be stated and the inclusion of the requirements that create the barrier justified in terms why they are required for the particular unit or qualification.

- **Employers**

We expect the Apprentices employer to enable the apprentice to have equal access to training and assessment for qualifications irrespective of their sex, marital status, age, religion, colour, race, nationality or ethnic origin or disability. Assessment must similarly be undertaken without discrimination. Employers are required to have in place a policy to ensure that such discrimination does not occur directly, indirectly or as a result of pressure from other bodies. There should be arrangements in place to monitor its application and effectiveness.

Where complaints relating to issues of inequality cannot be satisfactorily resolved by the Employer, learners and apprentices must be made aware of their right to appeal to us via the arrangements outlined in our Appeals Policy.

### **Implementing the policy**

At Tolley we will undertake to ensure that all staff and learners are made aware of the contents of this policy, both at the commencement and during their employment or apprenticeship.

All staff will be trained in the implementation of the policy. This means that they will be given specific training to ensure that fully understand the contents of the policy, and how it relates to their specific role.

Likewise, all apprentices will also receive training to ensure that they understand how the policy relates to their role in their business. This training will form part of their induction, and also be reinforced at regular intervals as part of their reviews.

### **Monitoring the success and relevance of our arrangements**

Tolley is committed to complying with all current and relevant legislation and, which at the time of writing includes, but is not limited to the Equality Act 2010 and Northern Ireland Equality Law.

As part of the learner and apprentice registration and certification processes for qualifications and units we may collect information on diversity, requests for special considerations, access arrangements and feedback from learners and apprentices, centres and other stakeholders.

All relevant issues identified that suggests that our provision or services may have unnecessarily impacted on learners and apprentices will be reported back to our Principal who will be responsible for ensuring that relevant staff introduce, as appropriate, amendments to provision and/or services where necessary and in accordance with our documented procedures for developing and reviewing units and qualifications.

Details of our on-going reviews will be made available to the qualification regulators upon request.

### **Contact us**

If you have any concerns that this policy is not being properly implemented, or if you've any queries about the contents of the policy, please contact Victoria Davies at [Victoria.davies@lexis.nexis.co.uk](mailto:Victoria.davies@lexis.nexis.co.uk)

### **Implementation**

All staff at Tolley will read the policy and it will be placed on the student and employer learning portal.

Equality and diversity awareness is promoted in team meetings and by working in an environment where the individual student is supported.

Employers will be asked regarding their own equality and diversity policies at the annual audit visit and students will have equality and diversity included as a topic in their 10-12 weekly reviews.

With regards to recruitment of staff, Tolley comes under the equal opportunities policy of Dick White Referrals (DWR), which can be found in the colleague handbook.

## Accessibility Policy

At Tolley our values reflect our commitment to be a centre of study where there are high expectations of everyone. Students are provided with high quality learning opportunities so that each attains and achieves all that they can. Everyone in our organisation is important and included and we recognise learning in all its forms.

Our Accessibility Policy complies with current legislation and requirements as specified in the Equality Act 2010, relating to accessibility for disabled learners. The effect of the law is that Tolley cannot unlawfully discriminate against students because of sex, race, disability, religion or belief and sexual orientation.

According to the Equality Act 2010 a person has a disability if:

- They have a physical or mental impairment, and
- The impairment has a substantial and long-term (more than 12 months) adverse effect on his or her ability to carry out normal day-to-day activities

We recognise and value each employer's knowledge of their student's disability and its effect on their ability to carry out everyday activities and respects student's right to confidentiality.

Tolley will ensure that reasonable adjustments are made for students with specific health and wellbeing needs, so that they may undertake training and assessments on a fair and equitable basis with all other students.

## Attendance and Punctuality Policy

At Tolley we believe that all students benefit from the education we provide, and therefore from regular course attendance. To achieve this, we will take appropriate action to ensure that all students achieve the maximum possible attendance and that any problems, which may impede full attendance, are acted upon as quickly as possible.

It is recognised that students want to attend courses to learn and to take advantage of all the educational and social opportunities that Tolley provides.

Our agreed course attendance target is 100% and Tutors will encourage good attendance for all. Attendance levels for all students will be recorded and reported to the employer.

Attendances are reported monthly to the Designated Safeguarding Person as defined by the Children Act 2004.

We expect that all our students will:

- Attend each day of their course
- Arrive on time and be appropriately prepared for the day
- Be registered as attending by the end of first break

Tolley expects that employers will endeavour to keep work commitments and holiday dates out of course dates when possible. Where missing a course is unavoidable the student will be expected to catch up through the use of online materials, or attending another location.

## Behaviour and Learner Code of Conduct Policy

At Tolley we aim to create a welcoming and caring environment where relationships are based on respect and we encourage each learner to develop positive self-esteem.

Tutors and staff have high expectations of good behaviour as an essential contribution to the educational and social experience of its students and to their happiness and well-being while studying with Tolley.

Led by our core values, everyone is expected to maintain the highest standards of personal conduct, to accept responsibility for their behaviour and encourage others to do the same.

Under this policy we endeavour to:

- Create a culture of professional behaviour
- Ensure that all students are treated fairly, shown respect and promote good relationships
- Refuse to give students attention and importance for poor conduct
- Help students take control over their behaviour and be responsible for the consequences of it
- Build a community which values kindness, care, good humour, good temper and empathy for others
- Ensure that excellent behaviour is a minimum expectation for all

We expect our students to be ready to learn and work both in and out of the classroom, to be punctual, with appropriate equipment, phones on silent and out of sight. We expect all students to respect diversity and other people's choices and to follow Tolley **Health and Safety Policy** as outlined in this handbook.

Tutors and staff at Tolley will treat students as individuals and help them to learn and feel confident. Tolley will encourage students to self-regulate, develop working relationships with other students, sustain a passion for our subjects and inspire students to adopt behaviour that is appropriate and acceptable.

We constantly assess whether students are engaged and progressing and work to build mutual trust and partnerships with students.

It may be beneficial at times to hold a meeting with the student and the employer when a student's support needs have not been sufficiently identified at the time of joining. This will address the student's progress and achievement, learning needs, course choice, attitude, behavioural routines and personal organisation.

Continual displays of disruptive and or inappropriate behaviour will be discussed with the student concerned and the employer and may result in withdrawal from the course.

## E-safety Policy

Tolley recognises it has a duty to provide students with quality internet access as part of their learning experience and that students should have an entitlement to safe internet access at all times. Tolley also recognises its obligations under Prevent Duty and employs filtering/firewall systems to prevent Staff and students from accessing extremist websites and materials.

The e-Safety policy extends to the full range of electronic communications including the internet, mobile phones and wireless technology.

It is important to understand the benefits, risks and responsibilities of using information technology. These risks include:

- Access to illegal, harmful, extremist or inappropriate images or other content
- Unauthorised access to / loss of / sharing of personal information
- The risk of being subject to grooming by those with whom they make contact on the internet
- The sharing / distribution of personal images without an individual's consent or knowledge
- Inappropriate communication / contact with others, including strangers
- Cyber-bullying
- Access to unsuitable video / internet games
- An inability to evaluate the quality, accuracy and relevance of information on the internet
- Plagiarism and copyright infringement
- Illegal downloading of music or video files
- The potential for excessive use which may impact on the social and emotional development and learning of the student

Students will receive training on e-safety from their employers and it will include what internet use is, and is not, acceptable and will be given clear objectives for internet use and use of other new technologies.

If a student receives an offensive or bullying e-mail they must immediately inform Tutor or another member of staff who will report it to the Designated Safeguarding Person.

Mobile phones must not be used in classrooms unless specifically allowed to support learning and approved by the Tutor.

# Site Safety Policy

## Introduction

Tolley has a duty of care to ensure the physical safety of staff and students whilst studying onsite with Tolley. This extends to all training courses at Lexis House or externally hired venues.

All external venues undergo a due diligence process before being hired to ensure that they have adequate provision around tutor and student safety, safeguarding and Prevent Duty. Tutors are required to ensure that they are aware of location of fire exits, first aid officers and local lockdown policies when teaching at external venues.

## Entering and Exiting buildings

All staff and students should observe the venue's sign in/out procedures. In addition, students will be required to sign a daily course register. This information will mean that we are aware of the whereabouts of students at all times, and especially in the event of an emergency or lockdown situation.

## Emergency Situations

In the rare event of an emergency situation arising, students will follow the instructions of the tutor and the building facilities manager. In the event of a terrorist threat, all staff and students should follow the Government 'Run, Hide, Tell' policy and it is the responsibility of all individuals to ensure that they are aware of what this entails.

Tolley has a Business Continuity Plan which is updated regularly. Tolley will take responsibility for informing Main Providers and Employers in the event that their students are affected by an event.

# Data Protection Policy

## Introduction

As part of delivering training services to our students Tolley will need to hold personal data, as defined by the General Data Protection Regulations (“GDPR”) rules.

Lexis Nexis has a Privacy Policy and Preference Centre:

<https://www.lexisnexis.com/global/privacy/en/privacy-policy-uk.page>

<https://stayintouch.lexisnexis.co.uk>

The policy will allow us to:

- Collect and store relevant personal data
- Use personal data to deliver exam training services to all students
- Share information with Employers and relevant third parties
- Use the information to create statistical analysis/data to improve our delivery and marketing collateral (providing it is anonymised)
- Market relevant products to students during and at the end of their training period provided they have not already opted out

Broadly, under the terms of GDPR, we will:

- Make it clear to students the specific purpose for which their data is to be used
- Give students the ability to approve the use of their data only for a single specified purpose
- Obtain explicit permission from a student before their data can be used for any other purpose (or shared with any third party for any reason)
- Enable students to make a “Subject Access Request” to request access to their personal information
- Enable students to exercise their “right to be forgotten” (i.e. ensure that all personal data is completely erased from systems and records once the relationship ends)
- Notify students of any data breach affecting their data within 72 hours of the incident being discovered

## Storing Personal Data

All personal details are held on a secure server so that all details are protected from unauthorised use, modification or disclosure.

The padlock symbol in the web browser means that industry-standard secure server software, (SSL) is in place to encrypt any information that is sent. This ensures the safe processing of credit/debit card details when online orders are placed. Tolley does not currently store any financial details (debit/credit card numbers).

For more information you may contact our Data Protection Officer:

Merilyne Knox Data Protection Manager (LN UK)

Email: [merilyne.knox@relx.co.uk](mailto:merilyne.knox@relx.co.uk)

# Complaints Policy

## Introduction

This document sets out our complaints policy and procedure and is aimed at employers, learners and apprentices, and all interested parties who encounter a direct or indirect service from Tolley.

Our aim at Tolley is always to exceed the expectations of our customers. However, we recognise that there will be circumstances where delivery fall below those expectations. This policy sets out the processes for dealing with those circumstances.

It is important that anyone who feels that they have encountered a level of service that is below their expectations that they raise any concerns they may have with us immediately so that we may address them and learn how we can improve in the future.

## Scope

This policy covers complaints from learners and apprentices, employers and members of the public in relation to the delivery of apprenticeships, qualifications and other associated services offered by Tolley.

## How to make a complaint

All Tolley staff have been trained to help learners who have an issue that they need resolving. So learners are encouraged to try and resolve any problem at the earliest opportunity by speaking to the tutor / trainer, who will do their best to resolve the issue.

If the learner is not satisfied with the response provided by the tutor / trainer, or indeed if the issue is about them, then they should please submit a written complaint, normally within two weeks of the event they are complaining about, to the contact details outlined at the end of policy.

## What details to submit

When a complaint is made, the following details should be given:

- full name
- contact details including a daytime telephone number
- a full description of the complaint (including the subject matter and dates and times if known)
- any names of the people that have been involved so far
- what attempts have been made to resolve the issue
- copies of any papers or letters to do with the complaint

Sometimes a complainant will wish to remain anonymous. However, it is always preferable for them to reveal their identity and contact details to us. If an individual is concerned about possible adverse consequences of revealing their identity, then they should inform us that they do not wish their identity to be divulged to the person against whom the complaint is being made.

While we are prepared to investigate issues, which are reported to us anonymously we shall always try to confirm an allegation by means of a separate investigation before taking up the matter with those the complaint/allegation relates.

## What happens to your complaint

We will acknowledge receipt of the complaint within 48 hours, and we will let the complainant know who is investigating their complaint.

Our Director of Tolley Learning will be responsible for ensuring the investigation is carried out in a prompt and effective manner and in accordance with the procedures in this policy and will allocate a relevant member of staff to lead the investigation and establish whether or not the issue relating to the complaint has occurred.

At all times we will ensure that Tolley personnel assigned to the investigation have the appropriate level of training and competence and they have had no previous involvement or personal interest in the matter. If the [Job Role] has had an involvement in the complaint matter, they will not be responsible for allocating a member of staff to carry out the investigation or for overseeing and managing the investigation.

We aim to investigate the complaint within 10 working days. If the complaint is more complex or involves people who are not available at the time, we may extend this to 15 working days. We may contact the complainant within this period to seek further information or clarification (in some instances we may recommend a meeting). At the end of the investigation we shall write/email to inform the complainant of our decision, and the proposed outcome.

## Appealing against the decision

If the complainant is unhappy with the decision made regarding the complaint, then they have 7 working days to appeal. The appeal should be made in writing to the Director of Tolley Learning and should clearly set out the following:

- the reasons for the appeal
- what it is regarding the proposed outcome from the complaint that is unsatisfactory
- any further evidence or information supporting the appeal

The appeal will be considered by the Director of Tolley Learning within 10 working days, and a final decision will be communicated to the complainant within that timescale. There is no further appeal stage with Tolley beyond this, and the outcome of the appeal will be considered final by Tolley. Complainants are at liberty to pursue their complaint with the ESFA or other appropriate government agency if they wish.

## Review arrangements

We'll review the policy and its associated procedures annually, and revise it as and when necessary in response to employer and learner feedback. Additionally, the policy may be reviewed in the light of trends that may emerge in the subject matter of complaints received.

## Staff training

All staff involved in the delivery of apprenticeship or other training on behalf of Tolley will receive training on this policy, as part of their induction into the company. Further review training will take place on an annual basis.

## Contact us

Any queries about the contents of the policy should be forwarded to the Director of Apprenticeships – Tax at [Victoria.davies@lexisnexis.co.uk](mailto:Victoria.davies@lexisnexis.co.uk)

## Safeguarding Policy

Tolley is committed to provide a secure environment for learners, where learners feel and are kept safe. Wherever possible, we teach learners how to recognise when they are at risk, and exactly how to get help when they need it.

Most of our apprentices will be over the age of 18, however we recognise that we need to have a policy and procedure in place to cover all eventualities, including the possibility of an apprentice being under 18.

### Introduction

What is Safeguarding?

For the purpose of this policy, safeguarding is:

- The protection of children and adults with additional needs from maltreatment
- Preventing impairment of health and development, ensuring circumstances consistent with the provision of safe and effective care to ensure best possible life chances
- Taking action to enable children and adults with additional needs to have the best outcomes
- Additionally, we recognises its duty in a wider context to safeguard all learners

**Child Protection:** Child protection refers to the processes undertaken to protect children identified as suffering, or being at risk of suffering significant harm.

The term 'Child' includes everyone under the age of 18. This policy also includes all adults who could be defined as 'vulnerable' .

Safeguarding is everyone's responsibility. Tolley's Learner Safeguarding and Child Protection Policy applies to all of our learners, in particular learners who are children and adults with additional needs. This policy considers contextual safeguarding by taking into account environmental factors in a learners life, that might be a threat to their safety and or welfare (Working Together to Safeguard Children (2018) and in Keeping Children Safe in Education (2018) key objectives of the policy are to:

- Promote a safe environment for all of our learners to learn and achieve
- Actively promote the welfare of learners
- Identify any learners who may be experiencing abuse or harm in the workplace, at home, or in relationships
- Take appropriate action to ensure learners safety (Child and Adult Protection)

Tolley is committed to ensure that every learner has the right to learn, free from fear and safe from abuse. This policy has been developed in accordance with the principles established by the Children Act 1989 and 2004 and related guidance.

## Policy statement

All staff at Tolley have a duty to identify any learners who may be experiencing abuse or harm in the workplace, at home, through on-line computer networks or in relationships, and take appropriate action in accordance with this guidance. Tolley includes in these procedures, reporting and dealing with allegations of abuse against members of staff

- We acknowledge that education staff have a crucial role to play in helping identify welfare concerns and indicators of possible abuse or neglect at an early stage
- It is not the responsibility of any member of staff at Tolley to investigate suspected cases of abuse. Instead, all cases should be referred to the Tolley Designated Safeguarding Lead (DSL), who will decide on the appropriateness of making a referral to outside agencies (Children's Services, Police, Adult Services). Where appropriate, the DSL will make relevant inquiries within the organisation
- We hope that all learners will feel confident that their concerns will be taken seriously and that disclosure to any member of staff will be treated in a sensitive manner
- All children regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights of protection

## Staff responsibilities

The Board of Tolley is committed to ensuring that we fulfil its duties in relation to safeguarding and protecting children, and adults with additional needs. All safeguarding policies will be reviewed on an annual (minimum) basis by the Board, which has responsibility for the oversight of Tolley safeguarding and child protection systems. The Board will receive quarterly reports on safeguarding activities and systems.

Claire Oglesby is the Designated Safeguarding Lead (DSL), with special responsibility for safeguarding and child protection systems, paying special attention to children and adults with additional needs. To carry out this role effectively, the DSL will undertake appropriate and specific training to provide them with the knowledge and skills required to carry out this role. The DSL's training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods, e.g. bulletins, conferences, local meetings and other training at regular intervals, at least annually, to keep up with any developments relevant to their role.

Jessica DeMelo is the Designated Safeguarding Officer (DSO). The DSO will deputise in the absence of the DSL. The DSO will also be available to liaise with and make referral decisions alongside the DSL.

The Designated Safeguarding Lead is responsible for:

- Liaising with the Board over matters relating to Safeguarding and Protecting Children and Adults with Additional Needs
- Maintaining a confidential recording system for safeguarding and child protection concerns
- Ensuring the Board considers the Tolley Learner Safeguarding Policy annually
- Lead responsibility for ensuring that Tolley carries out its duties in relation to safeguarding all learners

- Informing the Board of how Tolley and its staff have complied with the policy. An annual report of how duties have been discharged, including (but not limited to) the training that staff have undertaken.
- Overseeing the liaison between agencies, such as the police/children's services in connection with any allegations against staff. This will not involve undertaking any form of investigation, but will ensure good communication between the parties and provide information to assist enquiries
- Undertaking ongoing training in relation to safeguarding
- Ensuring that parents and or carers of learners under the age of 18 are aware of Tolley Learner Safeguarding and Child Protection Policy
- To ensure that all staff receive awareness training in safeguarding and protecting children and adults with additional needs, and are aware of Tolley procedures and policies in relation to this
- Ensuring that Tolley deals with allegations in accordance with these procedures
- To resolve any inter-agency issues
- To ensure that Tolley liaises with workplace employers and relevant external agencies, so that appropriate safeguarding procedures are in place

All members of staff have a responsibility to:

- Identify and recognise children and adults with additional needs, who may be in need of extra help who are suffering, or are likely to suffer significant harm
- Provide help for children and adults with additional needs where appropriate
- Be aware of and take appropriate action to raise concerns regarding poor or unsafe practice or potential failures in the Tolley safeguarding arrangements
- Where appropriate, contribute towards, read and adhere to Tolley policies
- Respond and refer any concerns about children and/or adults in accordance with this policy
- Maintain an attitude of 'it could happen here' where safeguarding is concerned and to always act in the best interests of the learner

## Actions

What to do if you are concerned that a learner is being abused or harmed:

- All staff at Tolley are expected to take seriously the duty to be aware of, and respond to, concerns regarding learners who are, or may be, experiencing abuse and harm in any part of their lives. These concerns are to be passed on to the Designated Safeguarding Lead
- Where the learner is not a child or adult with additional needs, the learner will need to agree to the passing on of this information. The only exception to this is if the concerned member of staff considers the learner to be at risk of serious harm or danger

If a learner informs you that they are experiencing abuse:

- Respond calmly and listen carefully to what the learner is telling you.

- Explain as early as possible that you cannot keep total confidentiality on such matters, and that you may need to speak to the Designated Safeguarding Lead and/or Officer
- If the learner then decides not to continue talking to you, offer them advice about confidential helplines
- Advise the learner to find a quiet area to speak where they can avoid interruption. Do not deter the learner by asking them to call back later
- Encourage the learner to Tell, Explain or Describe (TED) as clearly as possible, but do not ask leading questions
- Record what the learner has told you, or ask them to write it down themselves (if you think this is appropriate under the circumstances). This is because they may not want to tell anyone again what they have shared with you. Record times, locations and any other relevant facts. Do not include your own opinions or views about the disclosure, although you can describe the manner or state of the learner when they present themselves to you.
- Ensure the learner is safe at work. Try to ascertain how safe they will be if they leave the workplace or return home
- Respect confidentiality and do not discuss the disclosure with anyone other than the Designated Safeguarding Lead / Officer. It may be appropriate to talk to your line manager in some circumstances, but you do not automatically need to do so. Be clear with the learner about who you are speaking to and when. Keep the learner informed of what is happening as a result of their disclosure and ascertain their wishes and feelings where possible
- Where a learner has made a disclosure of abuse, or a staff member has concerns about abuse, no contact should be made with the learner's parents or carers without consultation with the Designated Safeguarding Lead
- You may have concerns that a learner is experiencing abuse because of their behaviour, changes in their presentation, or that they are missing from work. Contact the Designated Safeguarding Lead / Officer to discuss your concerns
- A learner may disclose information that leads to concerns that another child and or adult with additional needs is experiencing abuse. You need to inform the learner that you will need to tell the DSL / DSO
- The DSL / DSO may need to contact you to request information about a learner. This is because Tolley may need to contribute information to Children's Services for an assessment or child protection investigation. The DSL will ensure that we are adhering to the government Information Sharing Guidance and will discuss with you what to inform the learner. Wherever possible, we will be as open as possible with the learner
- If you continue to be concerned about a learner after you have informed the DSL/DSO, contact the DSL/DSO again to let them know and request feedback
- In the event that you have only raised your concern to the DSO, you continue to feel concerned about the learner, and you feel that the DSO has not followed the concern up appropriately, you may contact the DSL directly. If you feel the DSL is not following up your concern appropriately then you may raise your concern further to the Board.

## Supporting Learners at Risk

Statistically young people or adults with identified needs e.g. behavioural difficulties and/or disabilities are more vulnerable to abuse. Tolley staff who work in any capacity with young people or adults with profound and multiple disabilities, sensory impairment and/or emotional and behavioural problems will need to be particularly sensitive to signs of abuse.

### Referral to children's social care

The DSL will make a referral to children's social care, if it is believed that a learner is suffering or is at risk of suffering significant harm. The learner (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

### Looked After Children (LAC)

The most common reason for children becoming looked after is abuse or neglect. Upon enrolment Tolley ensures that appropriate staff have, information about learners looked after status and care arrangements. The DSL will keep details of the learner's social worker and the name and contact details of the local authority's head for children in care.

### Staff Training and Information

At induction, all staff must read and store a copy of a mandatory list of policies and documents, Learner Safeguarding and Child Protection Policy, Behaviour/Disciplinary Policy,

We will monitor the usage of website and other on-line resources to ensure that learners of any age are not accessing materials of an inappropriate nature, or materials that are not relevant to their learning outcomes.

All staff must undertake on-line child protection training within one month of starting at Tolley. In-house training on safeguarding children and adults with additional needs is provided for all new staff and is ongoing throughout employment. This includes Safeguarding in FE e learning, Prevent in FE e-learning and where relevant safeguarding and safer recruitment e learning.

### Keeping records

Confidential chronology records will be securely held for all concerns relating to abuse. They should be passed to the Designated Safeguarding Lead/Officer and kept in the confidential store. The referring member of staff should keep no other records, including electronic records, which should be deleted upon referral.

### Questions / concerns

Any questions or concerns should be addressed to the DSL / DSO in the first instance.

## Prevent Policy

This policy provides a framework for dealing with concerns of vulnerability and exposure to radicalisation and extreme views and ideologies, which are provocative and against the Tolley ethos.

### Background

In 2011, the UK Government published the Prevent Duty. Prevent is one of four elements of the UK's overarching counter-terrorism strategy (CONTEST). CONTEST is organised around four work streams, each comprising a number of key objectives:

- Pursue – to stop terrorist attacks
- Prevent – to stop people becoming terrorists or supporting terrorism
- Protect – to strengthen our protection against a terrorist attack
- Prepare – to mitigate the impact of a terrorist attack

PREVENT is a key part of CONTEST. The aim of Prevent is to stop people becoming drawn into and supporting terrorism. Prevent is a method of early intervention by diverting people away from being drawn into terrorist activity. Prevent takes place before a crime can be committed. This is by recognising, supporting and protecting people who might be susceptible to radicalisation.

The Counter-Terrorism and Security Act (2015) introduced a package of further measures aimed at countering the risk of terrorism. Subsequently, it is compulsory for all further education institutions “to have due regard to the need to prevent people from being drawn into terrorism”.

Prevent deals with all forms of terrorism (including non-violent extremism) which can create an atmosphere conducive to terrorism. The government strategy explains that preventing people becoming terrorists or supporting terrorism requires a challenge to extremist ideology.

The HM Government Prevent Strategy defines radicalisation and extremism as:

- Radicalisation is the process by which people come to support terrorism and extremism and, in some cases, then participate in terrorist groups. The drive behind radicalisation is to favour extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind.
- Extremism is vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism, calls for the death of members of our armed forces, whether in this country or overseas (HM Government Prevent Strategy, 2011).

The Government has created a system of ‘threat level’, which represents the likelihood of a terrorist attack in the near future. The current threat level to the UK (England, Scotland, Wales and Northern Ireland) is severe which means that a terrorist attack is highly likely.

## Introduction

Tolley perceives Prevent as a natural extension of our responsibility to protect and safeguard our learners from risk of harm, abuse and danger. Prevent is an integral part of the Tolley safeguarding policy and procedures.

Tolley actively promotes the British Values, which are defined by the Department for Education (DfE) as democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and those without faith. These values are encouraged, implemented and maintained by our leadership and management team with guidance of various strategic themes.

To ensure we meet our statutory requirements, we have established a policy and process to ensure that wherever possible, our learners remain safe with the aid of:

- Effective support services which provide clear information, advice and guidance on preventing learners from being drawn into extremism and radicalisation
- Literature written in clear and simple language which promotes equality, diversity and inclusion and challenges extremist ideology
- Support for learners and staff via guidance on how to access support through community partners
- A reporting strategy to ensure that the learner voice is heard and concerns of the learner are acted upon
- Support for at risk learners through the safeguarding processes

The central aim and objective of the Tolley Prevent policy is to create and maintain a safe and supportive working and learning environment for learners, staff and visitors alike.

As part of the Tolley approach to safeguarding, Prevent and the promotion of fundamental British Values, we will:

- Promote fundamental British Values by fostering a culture of sincerity within our delivery and providing the chance for learners to explore what this means to them
- Challenge exclusion, promote cohesion and construct learner resilience with the aim of our learners and staff contributing enthusiastically to wider society
- Operate a transparent and consistent anti-bullying approach which challenges harassment and discrimination and permits learners and staff to feel safe and supported
- Provide support, advice and guidance for learners and staff who may be at risk of radicalisation. This may include referral to multi-agency support
- Make certain that staff, learners and employers are aware of their roles and responsibilities in preventing radicalisation and extremism
- Have a leadership team that actively promotes the core values of shared responsibility and well-being for learners and staff, ensuring that these are at the centre of everything that we do.

Wherever possible we aim to safeguard and protect all of our learners, paying due regard to children and adults with additional needs. We recognise the need to respond by taking appropriate action to prevent extremist views and ideologies developing while still providing a broad curriculum.

Our parents, carers and employers also need an understanding of the risks individuals face in the current climate. Tolley will make efforts at every opportunity to ensure that parents, carers and employers are clear about how we are dealing with such incidents, including how our curriculum and ethos underpins our actions.

Tolley will assist and advise employer mentors, parents and carers who raise concerns. This assistance will take place through providing appropriate information, advice and guidance, and sign posting to multi agency teams. This policy and these methods of support are available to parents/carers and in the learner handbook.

### Roles and Responsibilities

Staff are to report all concerns immediately to the Tolley Designated Safeguarding Lead using the reporting concerns about a child / adult with additional needs (appendix 3) of the learner safeguarding and child protection, policy.

Claire Oglesby is the Designated Safeguarding Lead (DSL).  
Jessica DeMelo is the Designated Safeguarding Officer (DSO) and will deputise in the absence of the DSL.

The DSL and DSO are responsible for making all decisions regarding referrals to the relevant Local Authority, including Channel.

As part of our wider safeguarding responsibilities, company staff will be alert to:

- Disclosures by learners of their exposure to the extremist actions, views or materials of others outside of Tolley, such as in their homes or community groups
- Graffiti symbols, writing or art work promoting extremist messages or images
- Learners accessing extremist material online, including via social networking sites
- Learners voicing opinions drawn from extremist ideologies and narratives
- Use of extremist or 'hate' terms to exclude others or incite violence
- Intolerance of difference, whether secular or religious or, in line with our Equality, Diversity and Inclusion policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture
- Attempts to impose extremist views or practices on others
- Anti-Western or anti-British views.

Tolley 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 or abuse, as defined within Keeping Children Safe in Education (2018).

## Staff Awareness and Training

The Designated Safeguarding Lead and Designated Safeguarding Officer are required to complete appropriate and relevant training modules. The DSO is Designated Safeguarding Officer trained and the DSL is Designated Safeguarding Lead trained. In addition to this training, refresher training for the DSL and DSO on knowledge and skills will be undertaken annually or as otherwise required in order to remain up to date.

All members of staff complete the relevant safeguarding training and the relevant Prevent training. Refresher training is undertaken at least every 2 years. Updates on safeguarding changes are sent as and when they happen and current policies and any changes in legislation are sent to staff annually. Oversight of the refreshed policy and guidance is recorded on a staff-training log.

Relevant leaders and managers will undertake Prevent for Leaders and Managers via e learning and Local Authority training.

Learner facing staff will undertake an online workshop on safeguarding for practitioners via e learning and this is refreshed every 2 years. Additionally, learner facing staff will attend face-to-face workshops.

Staff in support functions will undertake Safeguarding and Prevent training via e learning.

Mandatory Prevent and safeguarding training will equip staff with the ability to recognise signs of radicalisation and extremism. Additionally, this training will outline the process by which concerns should be raised.

## Managing and Responding to Risk

We ensure that there is a shared understanding amongst staff and learners of the risks posed within the training environment by extremist behaviour. This is done by raising awareness through training, courses and information sharing.

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

Risk assessments are undertaken on any external speakers. Clear guidance is 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.

Wherever possible, 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 our premises.

Tolley 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. This will be done 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 Tolley is engaged are found to be either in breach of the Equality Act 2010 or advocating extremist views or behaviour, this will be addressed as a safeguarding issue by the DSL.

# Health and Safety Policy

## General Policy Statement

It is our policy to give the greatest importance to the health, safety and welfare of all employees, learners, apprentices, others working on our premises and sites and people visiting our premises and sites or who may be affected by our work activity.

This policy has two basic objectives:

- To provide a safe working environment and to ensure that all operations are carried out safely.
- To secure the co-operation and involvement of all employees in achieving safe working.

Under the provisions of the Health and Safety at Work etc Act 1974 Tolley has a specific duty to, so far as is reasonably practicable:

- Provide and maintain plant and systems of work that are safe and without risks to health.
- Make arrangements for ensuring safety and the absence of risks to health in connection with the use, handling, storage and transport of articles and substances.
- Provide such information, instruction, training and supervision as is necessary to ensure the health and safety of employees.
- Maintain the place of work in a condition which is safe and without risks to health and to provide and maintain safe means of access to and exit from such places of work that are safe and without risks to health.
- Provide and maintain a working environment for employees that is safe and without risks to health and adequate as regards facilities and arrangements for welfare at work.
- Conduct the business in a manner which will not put at risk the health, safety and welfare of other persons not in our employment whether working on or visiting our premises.
- Ensure that each person is aware of their individual responsibilities and duties.
- Ensure that all quotations allow for the cost of the provision of adequate welfare facilities and safe working methods.
- Ensure that there is liaison between Tolley and local representatives of the Health and Safety Executive or local authority.
- Enforce a disciplinary system where a breach of this policy or some serious negligent act places persons in danger or affects their health.
- Bring this policy to the attention of all employees and ensure its compliance.
- Ensure full consultation on health and safety matters will take place between management and staff as and when required or when new and improved work practices are investigated.
- Provide the services of a competent health and safety adviser.
- Modify this policy as required by amended regulations

## Organisation

Senior staff within Tolley, including the CEO are responsible for health, safety and welfare, including but not limited to the following:

- The effective development and implementation of the company's health and safety policy.
- Providing and maintaining a working environment for employees, learners and apprentices that is safe and without risks to health and adequate as regards facilities and arrangements for welfare at work.
- Ensuring that each person is aware of their individual responsibilities and duties and complies with the company's safety rules and procedures.
- Providing adequate resources to meet the requirements of this policy including support for persons carrying it out.
- Enforcing a disciplinary system where a breach of this policy or some serious negligent act places a person in danger or affects their health.
- Modifying this policy as required by amended regulations, any new plant or equipment, new materials, equipment, changes to the organisation etc.
- Setting a personal example and fostering a positive culture within Tolley towards health and safety.
- Ensuring that all levels of staff within Tolley (including learners and apprentices) are given adequate instruction, information and training to carry out the health, safety and welfare requirements and responsibilities delegated to them and are able to effectively implement safe systems of work.
- Monitoring the health and safety performance of Tolley to ensure compliance with the safety policy standards set.
- Ensuring all personnel are aware of the health, safety and welfare equipment and facilities provided by Tolley and are familiar with the procedures for their use.
- Undertaking an identification of all hazardous activities carried out and hazardous substances used by Tolley. Undertaking a risk assessment of these hazardous activities and substances and where appropriate producing a safe system of work to eliminate or minimise any risk of injury to the worker or other persons affected by the work activity or substance.
- Ensuring adequate monitoring and health surveillance arrangements and procedures are undertaken where necessary.
- Ensuring that all injuries, diseases and/or dangerous occurrences are notified to the relevant enforcing authority in compliance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations and records kept.
- Carrying out investigations into injuries, cases of work related illness and near misses and identifying in each case why they happened and ensuring when appropriate steps are taken to prevent a reoccurrence.

## Accountability

HR Director has direct day to day responsibility for health, safety and welfare matters within Tolley and is responsible for:

- Ensuring that all personnel under his control understand and comply with the company's policy and procedures on health, safety and welfare.
- Communicating with other Directors, managers and the [job role] to ensure that the safety organisation and policy are monitored, reviewed and updated as appropriate in order to modify the policy, as required by amended regulations, any new plant or equipment, new materials, equipment, changes to the organisation etc.
- Providing and maintaining a working environment for employees that is safe and without risks to health and adequate as regards facilities and arrangements for welfare at work.
- Providing adequate resources to meet the requirements of this policy including support for persons carrying it out.
- Enforcing a disciplinary system where a breach of this policy or some serious negligent act places a person in danger or affects their health.
- Setting a personal example and fostering a positive culture within Tolley towards health and safety.
- Ensuring that all under his control are given adequate instruction, information and training to carry out the health, safety and welfare requirements and responsibilities delegated to them and are able to effectively implement safe systems of work.
- Monitoring the health and safety performance of Tolley to ensure compliance with the safety policy standards set.
- Ensuring all personnel understand Tolley procedures for the use and maintenance of all equipment, first aid and welfare facilities and are familiar with their use.
- Ensuring that all injuries, diseases and/or dangerous occurrences are notified to the relevant enforcing authority in compliance with the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations and records kept.
- Carrying out investigations into injuries, cases of work related illness and near misses and identifying in each case why they happened and ensuring when appropriate steps are taken to prevent a reoccurrence.
- Carrying out regular inspections and maintenance of the premises, facilities and equipment to ensure safety standards are maintained and keeping inspection records.

The person who has day to day responsibility for Health and Safety in Tolley is the Director of Tax Markets. They are responsible specifically to the Chief Executive and overall has responsibility for:

- Setting a personal example and fostering a positive culture within Tolley towards health and safety.
- Assisting Tolley in keeping up to date with changes in legislation and safe working practices through external sources such as the HSE, manufacturers, Trade associations and consultants.

- Ensuring that all staff, learners and apprentices are given adequate instruction, information and training to carry out the health, safety and welfare requirements and responsibilities delegated to them and are able to effectively implement safe systems of work.
- Communicating with Directors and managers to ensure that the safety organisation and policy is monitored, reviewed and updated as appropriate in order to modify the policy, as required by amended regulations, any new plant or equipment, new materials, changes to the organisation etc.
- Ensuring all staff, learners and apprentices understand Tolley procedures for the use and maintenance of all equipment, first aid and welfare facilities and are familiar with their use.
- Ensuring regular inspections and maintenance of the premises, facilities, plant and equipment are carried out to ensure safety standards are maintained and keeping inspection records.
- Carry out an identification of all hazardous activities carried out together with all hazardous substances used. Assisting Tolley in carrying out risk assessments of such activities and substances and producing safe systems of work to eliminate or reduce the risk of injury to the worker or any other persons who could be affected by the work activity.
- Carry out an identification of the key risks that apply to learners, apprentices and visitors. Identifying the key risks, and proposing mitigating steps to reduce them.
- Arranging for appropriate fire fighting equipment to be available and maintained.
- Ensuring methods of communication with staff learners and apprentices are established as to the way they can be contacted.
- Ensuring that training and refresher training are carried out in accordance with the Management of Health and Safety at Work Regulations 1999.
- Advising the Chief Executive, Directors, managers or the work force upon this policy.

The Director of Tax of Apprenticeships is responsible for:

- Liaising with the HR Director, and identifying risks that relate to apprentices
- As part of the risk identification / mitigation process, they should work with the HR Director to develop the mitigation outcomes, and reduce identified risks.
- Keep up to date the risk register as it applies to learners and apprentices
- Take responsibility for the effective management of situations when learners and apprentices have accidents or are ill. This to include:
  - Ensuring the safety / welfare of the learner / apprentice
  - Communicating with the next of kin / person responsible for the learner
  - Ensuring that the emergency services have been alerted (where appropriate)
  - Recording the incident / outcomes etc.

Managers are responsible to the Chief Executive and are responsible for:

- Setting a personal example and fostering a positive culture within Tolley towards health and safety.
- Ensuring that all those under their control understand and comply with the company's safety policy provisions and that they are being effectively carried out and adhered to.

- Inspecting machinery, equipment and structures regularly and if there are faults, preventing access by any person to the defective apparatus until the faults have been rectified.
- Ensuring that all those under their control understand and comply with the company's safety policy provisions for the use and maintenance of all safety/ personal protective equipment, first aid, fire and welfare facilities.
- Ensuring that employees are adequately instructed in the safe operation of equipment, machinery or apparatus.
- Advising the Director, health and safety co-ordinator or the work force upon this policy.
- Communicating with all those under their control the Director and the health and safety co-ordinator to ensure the distribution of health and safety information and attending any meeting as required in respect of health and safety.
- Ensuring that all under his control are given adequate instruction, information and training to carry out the health, safety and welfare requirements and responsibilities delegated to them and are able to effectively implement safe systems of work.
- Arranging for incidents, accidents, near misses and dangerous occurrences to be reported.
- Ensuring that those under their control do not take unnecessary risks.
- Assisting the company in carrying out an identification of all hazardous activities carried out together with all hazardous substances used. Assisting the company in carrying out risk assessments of such activities and substances and producing safe systems of work to eliminate or reduce the risk of injury to the worker or any other persons who could be affected by the work activity.
- Ensuring that all those under their control understand and comply with the company's safety policy provisions for the use and maintenance of all safety/ personal protective equipment, first aid, fire and welfare facilities.

All employees are responsible to their manager and are responsible for:

- Setting a personal example and fostering a positive culture within the company towards health and safety.
- Assisting Tolley in carrying out an identification of all hazardous activities carried out together with all hazardous substances used. Assisting Tolley in carrying out risk assessments of such activities and substances and producing safe systems of work to eliminate or reduce the risk of injury to the worker or any other persons who could be affected by the work activity.
- Working safely in the interests of both themselves and other persons.
- Adhering to safe systems of work procedures and practices and using appropriate safety devices, equipment and clothing provided.
- Reporting to the appropriate person all unsafe conditions, accidents, damage, 'near misses' – whether or not there are any personal injuries in order that remedial action can be taken.
- Familiarising themselves with and complying with all rules, regulations, practices and procedures affecting health and safety.
- Applying good housekeeping standards in the area in which they work.
- Attending safety training in accordance with requirements.

- Taking reasonable care for the health and safety of themselves and of others (including fellow employees, other persons working on or visiting the premises/sites) who may be affected by their acts or omissions at work.
- Co-operating with their employer in the steps taken to meet the legal obligations.
- Reporting to their immediate manager any physical condition, system or practice which they consider unsafe or potentially unsafe.
- Refraining from intentionally or recklessly interfering with or misusing anything provided in the interests of health and safety.

All learner, apprentices, sub-contractors or self-employed persons working on behalf of Tolley will be required to conform to all health and safety and welfare legislation and company instructions applicable to the work being undertaken. They will:

- Ensure compliance with the relevant statutory requirements.
- Ensure compliance with Tolley policies and procedures.
- Comply with instructions from Tolley and other staff regarding safe working practices.
- In the case of sub-contractors and self-employed persons, provide copies of their own health and safety policy, risk assessments, method statements, COSHH assessments together with a completed contractor's questionnaire form and any other safety documentation that has been produced which is relevant to the work being undertaken.

## Freedom of Information Policy

The Freedom of Information Act (FOI) 2000 imposes a duty on public authorities:

- To confirm or deny that the information requested is held
- If the information is held, to communicate it to the applicant

Tolley will only consider FOI requests that relate to its Tax Training Programme.

Students may make a request in writing for recorded information held by or on behalf of Tolley and we will comply promptly and in any case within 20 working days. Unless subject to one of 23 exemptions described by the FOI, the information must be provided.

The Information Commissioner's Office is the independent regulatory authority for the FOI, and the avenue of appeal for requests that have not been resolved to the applicant's satisfaction.

The Senior Leadership Team have overall responsibility for FOI in Tolley in the context of the Tax Training Programme. Operational responsibility for students is delegated to the Director of Tolley Learning who will log and track all FOI requests.

There are 23 exemptions from the right of access. Some are designated 'absolute', meaning that if an absolute exemption applies, the duty to provide the information does not apply. Most are known as 'qualified' exemptions and require a public interest test to be applied, to decide whether the public interest in withholding the information outweighs the public interest in disclosing it. Where an exemption is deemed to apply to some or all of the information requested, the applicant will be notified in writing.

Where a student makes a request for his/ her own personal data, the data is absolutely exempt and the request will be treated as a subject access request under the General Data Protection Regulations. (see **Data Protection Policy**).

If the information requested includes personal information about a third party, the information will be provided, unless disclosure would contravene any of the data protection principles or Section 10 or 17 of the Data Protection Act (or its successor legislation, as amended) or the data subject would not be entitled to receive the data.

All eligible FOI requests that cost less than £450 to process (the 'appropriate limit') will be complied with free of charge. If the estimated cost of compliance exceeds £450, the duty to comply with the request does not arise. Such requests may be refused.

Any written reply from the applicant expressing dissatisfaction with our response to a request will be treated as a complaint, whether or not the applicant has expressly stated a wish to have the decision reviewed. This includes appeals against decisions to withhold information and will be dealt with in accordance with the **Complaints Policy** outlined in this handbook.

## Special Education Needs Policy

Tolley is fully committed to inclusion and we will ensure that all students with Special Educational Needs (SEN) are given the individualised help, advice and support needed to be fully included in all aspects of professional education, to realise their potential and to feel valued.

Tolley is committed to:

- Ensuring the SEN, Equality Act and Department for Education Code of Practice and guidance are implemented effectively across the organisation
- Ensuring full entitlement and access for all students to a high quality of education with a broad, balanced and relevant tuition to the appropriate professional qualification
- Meeting the individualised needs of all people with SEN by offering the most appropriate and efficient use of available resources
- Working with the SEN assessment of young people from their employer as early and thoroughly as possible;
- Ensuring that there are rigorous procedures for tracking and monitoring student's progress
- Liaising with employers to meet their student's additional needs
- Ensuring that an inclusive environment is created and fostered where all members of the college community respect and care for each other

The Senior Leadership Team has overall responsibility for the day-to-day management of all aspects of Tolley's work including provision for students with Special Educational Needs.

Access to a balanced and broad based curriculum, meeting the specific needs of the student is achieved through classroom management, seating arrangements and the provision of suitable printed materials.

Reporting to and discussions with the employer will be held on a regular basis to ensure engagement with the learning process, and ability to access the curriculum and students to provide reflective feedback.

If a student or employer wishes to complain about the SEN provision or policy he/she should follow the **Complaints Policy** in this handbook.

## Supporting Learners with Medical Conditions Policy

Tolley wishes to ensure that students with medical conditions receive appropriate and reasonable care and support whilst with us in learning. Tolley is an inclusive organisation that aims to support and welcome students with medical conditions and we aim to make reasonable adjustments for those with disabilities. Tolley aims for the whole environment to be inclusive and favourable to students with medical conditions and will arrange for reasonable adjustments to assist with minimising or removing disadvantages where appropriate. This includes the physical environment, as well as educational activities.

All information in relation to medical conditions of the students will be kept strictly confidential.

We will ensure all staff are aware of their duty of care to students in the event of an emergency and know what to do in an emergency.

Tolley understands that certain medical conditions are serious and can be potentially life threatening, particularly if ill managed or misunderstood and therefore full disclosure of pertinent medical conditions is required from employers of their students' needs.

Tolley understands the importance of medication being taken as prescribed.

A qualified First Aider is always on site during operational hours.

## National Information Helplines

Organisation	Telephone Number
Alcoholics Anonymous	0800 9177 650
Acas	0300 123 1100
Benefits Advice	0800 055 6688
Childline	0800 1111
Citizens Advice	03444 111 444
National Careers Service	0800 0126 606
Disability Services	0800 882 200
Eating Disorders	0845 634 1414
Frank (drugs information)	0300 123 6600
Gay and Lesbian Groups	0845 330 3030
MIND (mental health)	0845 766 0163
National Self Harm Network	0800 622 6000
NHS Direct	0845 4647
NSPCC	0808 800 5000
Samaritans	0845 790 9090
Shelter (homelessness charity)	0808 800 4444
Refuge Services (domestic violence)	0800 2000 247
Young / Single Parents	0808 802 0925

## Key Tolley Contact Information

Name	Job Role	E-mail address and telephone number
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Client Services	Tolley Learning Client Service Team	<a href="mailto:examtraining@lexisnexis.co.uk">examtraining@lexisnexis.co.uk</a> Telephone: 020 3364 4500