

SRS General Training and Course Ground Rules

We will do all our training together based on, and always showing, mutual respect; striving for professionalism in every detail in every situation.

Our jobs, current and future, affect people in everything we do.

We are People to Trust.

During your development you can expect SRS to

- Be here for you and for your professional development
- Keep an open-door policy
- Ensure equal opportunities for all participants
- Contribute with our organisational and personal knowledge and experience
- Work within our boundaries
- Uphold the SRS Code of Conduct

During your development SRS expect you to

- Keep an open mind
- Contribute with your knowledge, experience and efforts
- Be professional and courteous
- Bring out the best in people around you
- Listen to others
- Keep a sound sense of humour

General course and class ground rules

- PERSONAL SAFETY COMES FIRST IN ALL SITUATIONS - ALWAYS
- Safety is everybody's concern - always
- These Ground Rules are everybody's responsibility - always
- We are understated and discrete, we do not discuss clients or real cases in detail
- We start and finish on time
- We come prepared
- We use no phones or computers in class unless instructed to
- We participate to the best of our abilities
- We demonstrate mutual respect
- We speak one person at the time
- We manage confidentiality and uphold integrity
- We keep and leave classrooms and rest areas tidy and clean
- We ask when we do not understand
- We uphold SRS Code of Conduct in all activities

SRS Code of Conduct

Human Rights

- As a leader within this kind of security services, SRS has a responsibility towards the countries and communities in which we operate. We must practise responsible corporate citizenship and comply with laws and regulations wherever we operate.
- SRS expresses support and respect for fundamental human rights and recognises our responsibility to observe those rights when we conduct our business.
- Freedom of speech, freedom from any kind of discrimination based on race, colour, nationality, ethnic origin, sexual orientation and religion are among the rights which we support.
- In all the operations in which SRS operate we respect the dignity of human beings and strictly adhere to all relevant international laws and protocols on human rights. We follow rules of international humanitarian law and human rights law that are applicable as well as all relevant international protocols and conventions.

Employees

- SRS business is based on trust. To make sure that we earn the trust of our clients it is required that all SRS employees respect and protect our ethical philosophy and basic values as reflected in this code of conduct.
- The relationship between SRS employees must be built on mutual respect and dignity. The connection between the unique competence of our employees and the results we achieve is obvious. One of our strategies is to continuously improve the quality of our personnel. To achieve this, we have to be an attractive employer that offers excellent working conditions as well as appropriate training.
- SRS is an equal opportunity employer. Discrimination based on ethnic origin, religion, sex or another distinguishing characteristic is never to be accepted at SRS.
- SRS promotes a productive working environment and does not tolerate bullying or harassment.
- SRS recognises the importance of a continuous social dialogue with all SRS employees.

Business Ethics

- The SRS trademark is based upon honesty, integrity and confidentiality and we are strongly committed to upholding and promoting the highest ethical business standards in all aspects of our business. SRS does not accept any form of bribes.

Treatment of Clients

- Mutual trust and confidence between SRS and our clients is vital. All SRS employees are constantly striving to deliver service excellence, meeting our clients' expectations and anticipating their changing requirements.

Compliance

- SRS adheres to the principles of this Code of Conduct and expects the same of our suppliers, clients, sub-contractors and partners.
- Compliance to the terms of this Code of Conduct is a condition of any agreement between SRS and any other party.

- In case of non-compliance with the standards in our Code of Conduct, we will require and assist with improvements to meet the standards.
- Where there are differences between the terms of this Code of Conduct and national or international laws or other applicable standards, SRS shall adhere to the higher or more stringent requirements.
- We expect and encourage all persons and companies working on behalf of SRS to prevent and report any abuses of human rights including prohibition of torture or other cruel, inhuman, or degrading treatment or punishment, sexual exploitation and abuse or gender-based violence, human trafficking, slavery and forced labour, the worst forms of child labour and unlawful discrimination.

SRS L&D Policies, excerpts.

As a Swedish company and training provider SRS follow EU and Swedish law and legislation. Furthermore, SRS recognise and adhere to national law and legislation where SRS operate and conduct business. Furthermore, SRS uphold the regulations regarding licence-linked training solutions as required by our Supervisory Agencies and Awarding Bodies.

Based on this SRS have formulated policies governing our training offers and your rights as a participant/learner.

Equal Opportunities L&D

It is SRS policy that we will:

- Provide a non-discriminatory high standard of service to all our employees, service users and learners and operate within legislation without compromise.
- Consult, develop, plan and deliver services that are accessible to all our employees, service users and learners and with reasonable adjustment, be responsive to their needs and preferences.
- Use influence to promote equality through all the services and practices and ensure that all forms of harassment and discrimination are challenged.
- Make informed and fair decisions in relation to recruitment, promotion and training. The decisions are made in according to core competencies.
- Foster a culture where equality and human rights are valued and the skills and talents of our employees, service users and members are used appropriately to the benefits of the community.
- Monitor and review all our employees, service users and learners and develop initiatives, nurture applications from an expansive cross section of the security community.

Health & Safety L&D

General Principles

SRS are committed to achieving high standards of health, safety and environmental practice.

SRS expects staff, learners, visitors, contractors and other employers to share this commitment by complying with SRS policies and procedures, and to understand that they too have legal and moral obligations to themselves and to one another.

SRS intend to ensure the health and safety of all persons who may be affected by our activities by:

- Consulting with and involving our staff and learners in matters relating to their own health and safety.
- Providing, managing and maintaining our workplaces, grounds, and properties so that they are, as far as reasonably practicable, safe and that risks to health are controlled.
- Providing adequate and appropriate facilities and arrangements for the welfare of staff and learners.
- Providing, managing and maintaining equipment so that it is, so far as reasonably practicable, safe and that risks to health are controlled.
- Identifying hazards and conducting formal risk assessments when appropriate in order to minimise the risk for all activities undertaken by SRS.
- Ensuring that emergency procedures are in place, effective, properly used, monitored and

maintained.

- Implementing systems of work that are safe and where risks to health are controlled.
- Providing the information, instruction and training as necessary to ensure that staff and learners are competent to undertake their activities and are aware of any related hazards and the measures to be taken to protect against them.
- Keeping up to date with best practice in relation to health and safety and complying with all relevant legislation and authoritative guidance.

Data Protection L&D

Introduction

Scandinavian Risk Solutions AB (SRS) holds and processes information about learners, corporate clients, and other data subjects for administrative, approval and commercial purposes. When handling such information, SRS and all staff or others who process or use any personal information, must comply with the Data Protection Principles which are set out in the Data Protection Act 1998 (the Act) and upcoming EU General Data Protection Act (GDPR). In summary these state that personal data shall:

- be processed fairly and lawfully,
- be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with the purpose,
- be adequate, relevant and not excessive for the purpose
- be accurate and up to date,
- not be kept for longer than necessary for the purpose,
- be processed in accordance with the data subject's rights,
- be kept safe from unauthorised processing, and accidental loss, damage or destruction,
- not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data, except in specified circumstances.

Notification of Data Held

SRS shall notify all staff and learners and other relevant data subjects of the types of data held and processed by SRS concerning them, and the reasons for which it is processed. The information which is currently held by the SRS and the purposes for which it is processed will be amended when processing for a new or different purpose.

Responsibilities

All people in which information is held.

- ensure that all personal information which they provide to SRS is accurate and up to date;
- inform SRS of any changes to information, for example, changes of address;
- check the information which SRS shall make available from time to time, in written or automated form, and inform SRS of any errors or, where appropriate, follow procedures for up-dating entries on computer forms. SRS shall not be held responsible for errors of which it has not been informed.

Staff shall ensure that

- all personal information is kept securely;
- personal information is not disclosed either orally or in writing, accidentally or otherwise to any unauthorised third party. Unauthorised disclosure may be a disciplinary matter and may be considered gross misconduct in some cases.

When staff supervise learners doing work which involves the processing of personal information, they must ensure that those students are aware of the Data Protection Principles, in particular, the requirement to obtain the data subject's consent where appropriate.

Learner Responsibilities

All learners shall

- ensure that all personal information which they provide to SRS is accurate and up to date;
- inform the SRS of any changes to that information, for example, changes of address;
- check the information which SRS shall make available from time to time, in written or automated form, and inform SRS of any errors or, where appropriate. SRS shall not be held responsible for errors of which it has not been informed.

Rights to Access Information

Staff, Learners, Corporate Clients, Approving or Awarding Organisations and other data subjects in SRS have the right to access any personal data that is being kept about them either on computer or in structured and accessible manual files. Any person may exercise this right by submitting a request in writing to SRS.

SRS will make a charge of 100SEK for each official Subject Access Request.

SRS aims to comply with requests for access to personal information from Staff, Learners, Corporate Clients, Approving or Awarding Organisations and other data subjects, as quickly as possible, but will ensure that it is provided within 40 days unless there is good reason for delay. In such cases, the reason for the delay will be explained in writing by the Information Security Officer to the data subject making the request.

Subject Consent

SRS may ask for information about particular health needs, such as allergies to particular forms of medication, or conditions such as asthma, arthritis. SRS will only use such information to protect the health and safety of the individual, for example, in the event of a medical emergency or in carrying out physical activities.

The Data Controller and the Designated Data Controllers

SRS is the data controller under the Act and is ultimately responsible for implementation.

Assessment Marks & Learner Certificates

Learners shall be entitled to information about their marks for assessments, however this may take longer than other information to provide.

Retention of Data

SRS and Awarding Bodies will keep different types of information for differing lengths of time, depending on legal, awarding or approving body and operational requirements.

Compliance

Compliance with the Act is the responsibility of all learners and members of staff. Any deliberate or reckless breach of this Policy may lead to disciplinary, and where appropriate, legal proceedings.

Any individual, who considers that the policy has not been followed in respect of personal data about him- or herself, should raise the matter with SRS.

Appeals L&D

Introduction

We provide a high-quality training solution. However, we recognise that problems, disagreements and disputes can occur. In order to ensure that these events are resolved promptly SRS have the following appeals policy in place.

All learners will be made aware of the SRS appeals procedure at the start of their course or qualification.

Procedure

All appeals shall be submitted in writing to SRS within 30 days of the occurrence which prompts the appeal.

SRS will acknowledge receipt of the appeal within 5 working days.

The usual appeal process within the SRS, will follow:

- Appeal with Trainer, if not resolved;
- Move to an independent Trainer/Internal Quality Assurer

SRS will then conduct an investigation into the circumstances of the appeal. The Appellant shall be notified in writing as to the outcome of that investigation within 15 working days from the date of acknowledgement

Escalation to Awarding Body

No more than 4 weeks from the date of the notification of the outcome of the investigation into the initial appeal shall pass before matters are escalated to the relevant Awarding Body, if required.

Malpractice & Maladministration L&D

Definition of Malpractice

Malpractice is essentially any activity or practice which deliberately contravenes regulations and compromises the integrity of the internal or external assessment process and/or the validity of certificates. It 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 SRS; or,
- the qualification or the wider qualifications community.

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. For the purpose of this policy this term also covers misconduct and forms of unnecessary discrimination or bias towards certain or groups of learners.

Definition of Maladministration

Maladministration is essentially any activity or practice which results in non-compliance with administrative regulations and requirements and includes the application of persistent mistakes or poor administration or payments within a centre (e.g. inappropriate learner records).

Examples of L&D Malpractice and Maladministration

The categories listed below are examples of centre and learner malpractice and maladministration. Please note that these examples are not exhaustive:

- Deliberate failure to maintain appropriate auditable records, e.g. certification claims and/or forgery of evidence
- Persistent instances of maladministration within the centre
- Fraudulent claim for certificates
- The unauthorised use of inappropriate materials / equipment in assessment settings (e.g. mobile phones)
- Intentional withholding of information from us which is critical to maintaining the rigour of quality assurance and standards of qualifications
- Collusion or permitting collusion in exams/assessments
- Learners still working towards qualification after certification claims have been made
- Contravention by centres and learners of the assessment arrangements specified for the qualifications
- A loss, theft of, or a breach of confidentiality in, any assessment materials
- Plagiarism by learners/staff
- Copying from another candidate (including using ICT to do so).
- Unauthorised amendment, copying or distributing of exam/assessment papers/materials
- Inappropriate assistance to learners by centre staff (e.g. unfairly helping them to pass a unit or qualification)
- Submission of false information to gain a qualification or unit
- Deliberate failure to adhere to, or to circumnavigate, the requirements of Reasonable Adjustments and Special Considerations Policy.

Process for Making an Allegation of Malpractice or Maladministration

Anybody who identifies or is made aware of suspected or actual cases of malpractice or maladministration at any time must immediately notify the awarding organisation. In doing so they should put the details in writing/email and enclose appropriate supporting evidence.

All allegations must include (where possible):

- centre's name, address and number
- learner's name and unique registration number
- centre/personnel's details (name, job role) if they are involved in the case
- details of the qualification affected, or nature of the service affected
- nature of the suspected or actual malpractice and associated dates
- details and outcome of any initial investigation carried out by the SRS or anybody else involved in the case, including any mitigating circumstances

SRS will immediately notify relevant awarding organisation if we suspect malpractice or maladministration has occurred as we have a responsibility to the awarding organisation and relevant regulatory authorities to ensure that all investigations are carried out rigorously and effectively.

In all cases of suspected malpractice and maladministration reported to, SRS will protect the identity of the 'informant' in accordance with our duty of confidentiality and/or any other legal duty.

Complaints L&D

Introduction

This document sets out Scandinavian Risk Solutions AB (SRS) complaints policy and is aimed at customers, learners and all interested parties who encounter a direct or indirect service from SRS. It covers complaints which learners, members of the public or customers may wish to make in relation to the qualifications and associated services offered by SRS.

If you are unhappy about the way an assessment was managed and you suspect malpractice may have occurred, you should send your concern to us in accordance with the arrangements in our Malpractice and Maladministration Policy.

How Should I Complain?

You should first try to sort out any problem at the earliest opportunity by speaking to the person who dealt with you. If they cannot help or you wish to speak to someone else, you can ask to speak to the Manager.

If this is not possible, or if you are not satisfied with the help provided by the Manager, please send a written complaint. You should complain in writing, normally within one month of the event you are complaining about and address it to us at the contact details outlined at the end of policy.

What Details Do I Give?

When you contact us, please give us your full name, contact details including a daytime telephone number along with:

- a full description of your complaint (including the subject matter and dates and times if known)
- the names of any of the people you have dealt with so far
- any copies you may have of papers or letters/emails to do with the complaint

What Will Happen?

We will acknowledge receipt of your complaint within 5 working days, letting you know who is investigating your complaint.

We aim to investigate the complaint within 30 days. If your complaint is more complex or involves people who are not available at the time, we may extend this to 60 days. We may contact you 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 you of our decision.

What Happens if my Complaint is Upheld?

If any part of your complaint is upheld, we will of course apologise and give due consideration to how we can improve our service and arrangements - for example, by reviewing our procedures to assess the impact on our arrangements and assessment process (if relevant) or arranging for staff training. In extreme circumstances, disciplinary procedures may be exercised where the performance or behaviour of our staff is deemed inappropriate.

What if I Disagree?

If you disagree with the decision the first point of call is the Manager. If you are still unhappy with the decision taken by SRS in reviewing the complaint you can then take the matter through our Appeal arrangements which are outlined in our Appeals Policy.

Contact Us

If you wish to make a complaint, please contact us on +46 (0)8 440 90 70 or via email at mail@srsgroup.se.

Reasonable Adjustments L&D

Introduction

This policy is primarily aimed at learners who are delivering/registered on or have taken a Scandinavian Risk Solutions AB (SRS) qualification or unit.

Each awarding organisation will have specific guidelines to follow when applying for reasonable adjustments for individual learners and what can be automatically approved by SRS.

SRS Responsibility

We ensure the following:

- Every learner is given the opportunity to achieve the qualification/unit without changing the assessment criteria or achievements.
- Identification of learners who require reasonable adjustments prior to delivery of course.
- Where identification of a learner who requires, reasonable adjustments, SRS will apply to the relevant awarding organisation for approval if required, see individual guidance provided by different awarding organisations.
- Where reasonable adjustment is approved, make necessary provision, however ensuring that assessment demand is not lowered.
- Inform Internal Quality Assurer of learners on a qualification that is completing the assessment using a particular reasonable adjustment method.
- Maintain accurate records of learners with reasonable adjustments as this will be monitored through the External Quality Assurance system.
- Supply information to the relevant awarding organisation on the use of reasonable adjustments with learners as requested.

Conflict of Interest L&D

Definition of a Conflict of Interest

For the purposes of this policy we have adopted the definition used by our Awarding Body AoFAQ in relation to conflict of interest. In essence a conflict of interest exists in relation to SRS where:

- its interest in any activity undertaken by it, on its behalf, or by a member of its staff have the potential to lead it to act contrary to its interest in the delivery of qualifications in accordance with the requirements of the regulator's Conditions of Recognition,
- a person who is connected to the delivery of qualifications at SRS has interest in any other activity which have the potential to lead that person to act contrary to his or her interests in that delivery and impact on our compliance with the requirements of AoFAQ,
- an informed and reasonable observer would conclude that either of these situations was the case.

Interests in presenting and assessment

SRS will take all reasonable steps to avoid any part of the assessment of a Learner (including by way of moderation) being undertaken by any person who has a personal interest in the result of the assessment. Trainers, Moderators and Markers should be considered if their actions could affect the validity of the qualification or assessment outcome.

If a person has a conflict of interest with the assessment of a learner, SRS will take reasonable steps to ensure the relevant part of the assessment is subject to scrutiny by another person.

Examples of potential Conflict of Interest:

Where the Trainer, Assessor, Marker or Moderator:

- is employed by the Learner
- is a close family relationship / close friend with the Learner
- has a business relationship with the Learner
- where the Learner is a Manager / Supervisor of the said person
- Financial gain either direct or indirect is involved

Conflict of Interest Principles

In implementing our approach to identifying and managing actual/potential conflicts of interest staff are required to abide by the following principles:

- All managers and staff must buy into and commit to identifying and managing all actual/potential conflicts of interest that may affect SRS and in doing so raise possible conflicts of interest with the Head of Centre if in doubt.
- Staff must be proactive in the identification and management of conflicts of interest that may affect our effectiveness, level of regulatory compliance and/or reputation.
- Staff must be open about the nature of any potential/actual conflicts of interest and not try to hide or present them in a better light – managing conflicts of interest is about preventing issues from occurring that may impact on our operational effectiveness and/or regulatory compliance.
- Strive to identify and deal with conflicts of interest sooner rather than later.
- Our controls to managing any potential conflicts of interest must be proportionate to the risks associated with the identified conflict(s).

If the breach is also classified as an Adverse Effect then the SRS Head of Centre will promptly inform the Awarding Body stating the reasonable steps that we have taken or intend to take to prevent, correct or mitigate the Adverse Effect. Including a detail of any reviews we are/will carry out.

Declaring a Conflict of Interest

- SRS will take all reasonable steps to ensure that a Conflict of Interest does not occur, if this is not possible:
 - A declaration of actual or potential conflicts of interest must be notified to the Head of Centre as soon as possible.
 - Where an actual conflict of interest has occurred, SRS will notify the Awarding Body
- SRS will keep a log of all actual or potential conflicts of interest.