

OXFORD  
GLOBAL

**Student Policy Handbook**

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## Introduction to the Policies

These policies are designed to protect students' welfare and safety before, during and after the Programme. They should be read in conjunction with the:

- Student Handbook
- Short Course Agreement
- Student Rules

These can be found at [www.oge-programmes.org/policies](http://www.oge-programmes.org/policies) and will be updated from time to time.

The policies set out clearly the duties we are responsible for under the terms and conditions and those that you will be your own responsibility. You are deemed by Oxford Global Exchanges (OGE) to have agreed to abide by these policies whilst attending one of our courses by agreeing to the terms and conditions.

We are aware that the majority of students taking part in OGE short courses are not UK citizens, nor residents in the UK. They may therefore be accustomed to a different legal system, but nevertheless must abide by UK law while they are in the UK. The Policy sets out the crucial aspects of the law that are applicable to their time spent with OGE.

## Student Welfare and Safeguarding Policy

Oxford Global Exchanges (OGE) is highly committed to create and maintain a positive, supportive and secure environment for all its students. OGE is also committed to take all allegations seriously and respond to them swiftly and appropriately for all the participants to feel safe and valued during their stay in the UK.

All members of the staff at OGE, including full time, part-time, associate staff and partners are responsible for safeguarding and promoting the welfare of our students.

### Principles to Safeguarding:

- Ensure a culture of ongoing vigilance towards students' welfare and safeguarding is upheld;
- Ensure the accommodation, teaching venues and activities are selected with regard for student welfare and to conduct risk assessments where appropriate.
- Ensure this policy is applied equally to all participants regardless of age, gender, ethnicity, disability, sexuality, faith or belief;
- Ensure awareness of safeguarding issues among all OGE staff and partners including full time, part-time, associates, and partners;
- Ensure a safe environment is established in which students attending the programmes know they can approach any staff at OGE - where their voice will be heard and they will receive a supportive, immediate, and consistent response;
- Ensure to provide students with clear procedures for identifying and reporting any safeguarding issues.

### Duty to Report

1. All staff / contractors involved in the delivery of our programmes and related services such as trips and activities and accommodations are expected to be aware of their duty to report.
2. All staff / contractors will be checked with respect to their understanding of their responsibilities and trained appropriately, where necessary.
3. Failure to comply with these responsibilities will be seen as a serious matter, leading to re-evaluation of the staff / contractor role in our programmes with the possibility of termination of cooperation in the case of serious breaches.
4. OGE will make available a 24-hour telephone number that students may contact in case of emergency and will ensure that this number is always monitored while

students are attending our programmes.

5. The ‘Designated Student Welfare and Safeguarding Officers’ of OGE are the Executive Director and the Course Director whose contacts will be informed to the students in the Health and Safety Induction during the first day of any OGE programme.

6. They are responsible for providing support and advice on student welfare and safeguarding issues with respect to the programmes organised by OGE.

Other aspects of their roles include:

- a. Obtaining information from staff / partners who have concerns relating to the safeguarding of students, and the recording of this information;  
Assessing this information quickly and carefully and asking for further information where appropriate;
- b. Making referrals to appropriate statutory protection agencies or the police without delay.

### **Reporting Procedures**

1. In all cases in which a student discloses issues relating to safeguarding and / or welfare, the informed member of staff / partner should contact one of the ‘Designated Student Welfare and Safeguarding Officers’ immediately and complete a ‘Student Welfare and Safeguarding Report Form’ (see below).
2. All staff to which a student discloses issues that may be related to safeguarding and / or welfare must keep a written record of concerns, as above. Such records must be kept securely, separate from the main student files, and in locked locations.

### **Allegations management of abuse against members of staff:**

1. Allegations of abuse, or concerns raised, against OGE staff or associates and / or its partners will always be treated seriously.
2. The allegation must always be referred to a ‘Designated Student Welfare and Safeguarding Officer’ who will take the appropriate steps to ensure the safety of the student, and any others who may be at risk. Where the allegation is against the Designated Safeguarding lead, it must be passed onto another Designated Safeguarding Lead. The allegation will then be handled by the Designated Safeguarding Lead in accordance with the rest of this policy and using professional judgement.
3. Designated Lead must:
  - a) Maintain confidentiality throughout the process.

- b) Provide the accused with a full opportunity to answer the allegations.
  - c) Complete the investigation within a month and within a week if unsubstantiated or malicious;
4. Suspension should happen where behaviour has been intolerable or there has been a disciplinary breach of sufficient weight.
  5. OGE has a duty to make reports and provide relevant information to the Disclosure and Barring service (DBS) where there are grounds for believing, following an investigation, that an individual may have committed misconduct. The responsibility for reporting cases to the DBS lies with the 'Designated Student Welfare and Safeguarding Officer'.
  6. The allegation, how it was followed up and resolved, and any actions taken must be recorded and shown to the individual against whom the allegation was made. If the allegation is a malicious one it should be removed from any records kept on the individual.
  7. At the conclusion of all cases the Designated Safeguarding Leads must review the case and whether any improvements can be made to procedures and practices to prevent a similar occurrence and improve processes.
  8. Records of all allegations and investigations are to be kept for 10 years.

## Student Welfare and Safeguarding Report Form

This form is to be used by anyone who wishes to report concerns about a student who i) has disclosed an allegation of abuse to them ii) they suspect may be / have been the subject of abuse. Please complete it as soon as possible and forward it to the Designated Student Welfare and Safeguarding Officer. If you do not have all the information asked for please fill in the parts you can and pass it on within the same working day. Please do not delay.

<b>1. Your Detail</b>	
Name:	
Position:	
Email:	
Phone;	
Address:	
<b>2. Details of Alleged Victim</b>	
Name:	
Email:	
Phone:	
Address	
<b>3. Details of the Alleged Perpetrator (If Known)</b>	
Name:	
Email:	



## Student Health and Safety Policy

Oxford Global Exchanges (OGE) is committed to maintaining safe and healthy studying conditions for all our students through regular assessments of risks in the living and study places; ensuring the safe handling and use of substances; and providing appropriate information, instruction, training and supervision.

### General

In accordance with our health and safety duties, we are responsible for:

- a) Assessing risks to health and safety and identifying ways to overcome them.
- b) Providing and maintaining a healthy and safe place to live and study and a safe means of entering and leaving our premises, including emergency procedures for use when needed.
- c) Providing information, instruction, training and supervision in safe working methods and procedures as well as studying areas and equipment that are safe and without risks to health.
- d) Ensuring that equipment has all necessary safety devices installed and that equipment is properly maintained.
- e) Regularly monitoring and reviewing the management of health and safety, and thereafter making any necessary changes and bringing those to the attention of all staff and students, as appropriate.

### Personnel responsible for the implementation of this Policy

1. The Executive Director has overall responsibility for health and safety and the operation of this policy.
2. All staff have a duty under common law to take care of students in the same way that a prudent parent would.
3. It is the responsibility of all staff (teaching and non-teaching), to ensure that the Executive Director is informed of any hazards present in programmes run by GE. In practice, this means 'if you see something which you consider to be a hazard,' report it. These reports should be confirmed in writing.

### Code of Practice

1. A clean and orderly environment is essential for students of OGE programmes. Residential staff have a particular responsibility for ensuring that student accommodation, and common areas are neat and tidy in order for cleaning staff to

undertake their duties. It is not the duty of the cleaning staff to tidy up the personal belongings of students.

2. Periodic checks of the contents and layout of rooms should be made by the Course Director and any other residential staff. Defective equipment, fittings and furniture should be reported immediately to the Course Director.
3. Key guidelines:
  - a) Ensure that all fire exit doors are unlocked, and that all doors including fire doors are easy to open and free from obstruction.
  - b) Ensure that free-standing furniture is not placed in such a position that it can be pushed over.
  - c) Avoid storing heavy equipment, materials etc. on top of tall cupboards and high shelves.
  - d) Ensure that all floors are kept clear of obstruction other than furniture so that cleaning staff are able to work safely and efficiently.
  - e) Report any insecure wall-mounted units.
  - f) Make sure that light sockets are not left without a bulb, to avoid the possibility of electric shock.
  - g) Do not leave electric power cables, leads etc. trailing across the floor.
  - h) Switch off and un-plug electrical equipment after use.
  - i) Edged or pointed tools (such as scissors, knives, and compasses) should be regularly checked for damage and stored safely.
  - j) Aerosol containers should be kept in a safe, cool place to which they should be returned after use. They should never be left in direct sunlight.

### **Emergency Evacuation and Fire Precautions**

1. If the fire alarm sounds the following guidelines will apply:
  - a) Students will be informed in the Health and Safety Induction on the first day of every programme and shown where the assembly point is.
  - b) All students and all Staff will proceed at once to the assembly area, remaining calm and walking quickly.
  - c) Close windows and doors as you go, but do not waste time doing so. Getting out is more important.

- d) Evacuate the building as quickly as possible at the nearest possible exit, including fire exits.
  - e) Do not stop to collect personal possessions.
  - f) Do not go back into the building until you are told it is safe to do so.
2. If the fire alarm sounds at any time, students should assemble according to their class groups where the Programme Coordinators will call out the names of those students to ensure that everyone is present.
  3. The Programme Coordinators should then report any missing students to the Course Director.
  4. In the event of a real fire, the persons calling the roll should then go through the lists again and make sure that every student is indeed present.
  5. In the event of a fire call 999 as soon as possible.
  6. No-one may re-enter the building until given permission by the Course Director, or the Executive Director in the event of a fire practice, or by the Emergency services (in the event of a fire).
  7. In accordance with the training statement above, all students will be trained to ensure they know what to do when they hear the fire alarm. If necessary, additional and repetitive training will be available.
  8. Never put yourself or anyone else in danger. You should operate the nearest fire alarm and, if you have sufficient time, call the Course Director and report the location of the fire.

### **Other Specific Hazards**

1. There are many potential hazards, this list outlines examples of some, but not all, of these hazards.
  - a) Litter must not be allowed to accumulate in such a way that could lead to a fire hazard.
  - b) Broken windows should be reported immediately. Students should NOT be pick up broken glass. If necessary, a temporary barrier could be erected using chairs.
  - c) Electrical work should be undertaken by persons who are employed to do so. This normally means external electrical contractors. Faulty equipment, loose, worn or frayed wiring, damaged plugs etc. should be reported immediately. Do not attempt to fix it yourself.

- d) Students must be clearly informed of the fact that traffic drives on the left in the UK as part of the Safety Induction.

### **Equipment**

No person should attempt to repair equipment unless trained and designated to do so.

### **Reporting for Students**

1. The Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) applies to schools. The Course Director will be responsible for reporting and investigating any incident under RIDDOR. Accidents which result in death or major injury must be reported immediately.
2. Major injury includes but is not limited to:
  - a) a fracture other than to fingers, thumbs and toes;
  - b) amputation;
  - c) dislocation of shoulder, hip, knee or spine;
  - d) loss of sight (temporary or permanent);
  - e) chemical or hot metal burn to the eye or any penetrating injury to the eye;
  - f) injury resulting from an electric shock or electrical burn leading to unconsciousness;
  - g) loss of consciousness caused by asphyxia or exposure to a harmful substance or biological agent;
  - h) either of the following conditions which result from the absorption of any substance by inhalation, indigestion, or through the skin:
    - i) an acute illness requiring medical treatment;
3. Any injuries that lead to a student of OGE being incapacitated for over 2 consecutive days (including weekends) needs to be reported. The report must be made within 24 hours of the accident.
4. Any reported cases of a work-related disease specified under RIDDOR, that affects a student and that a doctor confirms in writing.

### **Review of Policy**

Safety is an on-going concern. Additions to this policy can be made at any time in the future. Recommendations for any amendment to this policy should be reported to the Course Director and Executive Director. This policy will be continually reviewed to ensure that it is achieving its stated objectives.

## Medical and First Aid Policy

Oxford Global Exchanges (OGE) takes its duty of care to students very seriously and implements appropriate policies for the care of students who are unwell.

### General

1. OGE's appointed GP surgery is Banbury Road Medical Centre, 172 Banbury Road, Oxford, OX2 7BT. Students who require the attention of a general practitioner while in Oxford will be accompanied to the surgery by a staff member.
2. Prescribed medicines are given only to the student to whom they are prescribed.
3. Students allowed to self-medicate are assessed as sufficiently responsible to do so.
4. Any student who is unwell must inform a member of staff in a timely fashion, regardless whether medical attention is needed. This is an important safety rule to protect your welfare and that of other students.
5. Any matter requiring medication or the need to visit a doctor must be referred to the Course Director before action is taken, except in an emergency.
6. Major and minor accidents and illnesses are recorded.
7. There are first-aid boxes held by the Course Director in the OGE office and at the College Porter's Lodge. If you use items from these boxes, please inform the Course Director so that they can be re-stocked immediately.
8. OGE makes a 24-hour telephone number available to students while they are on one of our programmes.
9. OGE's accommodation and teaching venues in Oxford colleges have a first aider on site at all times.
10. OGE organises block travel insurance cover for students. In the unfortunate event of accident or illness, the student is strongly encouraged to contact the insurer. Contact details can be provided by the Executive Director.
11. Students are strongly encouraged to take out their own medical insurance as appropriate.
12. We recognise that, as legal adults, our students are entitled to take over-the-counter medication that they may consider appropriate. However, we **strongly encourage** students to check with a senior member of staff before taking any medication purchased in the UK, since labelling, doses, etc. may be unfamiliar to our overseas students.

### **Liability**

OGE is insured by Hiscox Insurance Company Limited for public liability claims of up to £1 million.

### **Confidentiality**

1. Students should be aware that they can discuss any matter with the Course Director or GP in complete confidence.
2. Any breach of that confidence would be discussed with the student first and only if it is thought that the health of other students at programmes of OGE was at risk, or that it was in the students' own interest to share the information.

### **Emergency Procedure**

1. Where necessary the emergency services should be called immediately (999) and the Course Director is informed:
  - a. A member of staff must accompany a student to hospital.
  - b. The Course Director should inform the student's parents and the Executive Director at the earliest possible opportunity.

## Anti-Harassment Policy

Oxford Global Exchanges (OGE) is committed to providing a safe and comfortable environment in which all students are treated with respect and dignity. Each student has the right to study in an atmosphere that promotes equal opportunities and prohibits discriminatory practices, including harassment.

### Definition of Harassment

1. Harassment, on the basis of a Protected Characteristic, is a form of discrimination and is strictly prohibited. Under this policy, harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment. It also includes treating someone less favourably because they have submitted or refused to submit to such behavior in the past.
2. Unlawful harassment may involve conduct of a sexual nature (sexual harassment), or it may be related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation, citizenship or any other characteristic protected by law or that of his/her relatives, friends or associates. Harassment is unacceptable even if it does not fall within any of these categories.
3. Harassment may include, for example:
  - a) Unwanted physical conduct or "horseplay", including touching, pinching, pushing and grabbing;
  - b) Unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
  - c) Offensive e-mails, text messages or social media content; mocking, mimicking or belittling a person's disability;
  - d) The effect of creating an intimidating, hostile or offensive work environment;
  - e) The purpose or effect of unreasonably interfering with an individual's work performance; or otherwise adversely affects an individual's employment opportunities.
4. A person may be harassed even if they were not the intended "target". For example, a person may be harassed by racist jokes about a different ethnic group if the jokes create an offensive environment.

5. Sexual harassment constitutes discrimination and is illegal under UK law. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favours and other verbal or physical conduct of a sexual nature when, for example:
  - a) In general terms, sexual harassment is unwanted sexual attention or conduct of a persistent or offensive nature made by a person who knows, or reasonably should know, that such attention or conduct is unwelcome or sexually offensive.
  - b) Sexual harassment does not refer to occasional compliments of a socially acceptable nature or even indications of affection, which are immediately ceased once a student indicates that they are unwelcome.
  - c) Sexual harassment, however, may include a range of subtle and not so subtle behaviours and may involve individuals of the same or different gender.
  - d) Depending on the circumstances, these behaviours may include, but are not limited to: unwanted sexual advances or requests for sexual favours; sexual jokes and innuendo; verbal abuse of a sexual nature.
  - e) body, sexual prowess or sexual deficiencies; leering, catcalls or touching; insulting or obscene comments or gestures; display or circulation in the workplace of sexually suggestive objects or pictures (including through e-mail); and other physical, verbal or visual conduct of a sexual nature.

### **Complaints Policy**

1. OGE never condones or approves of any conduct in violation of this policy. The Executive Director is responsible for assuring that no student is subjected to conduct that constitutes discrimination or harassment under this policy.
2. If you are being harassed or bullied, consider whether you feel able to raise the problem informally with the person responsible. You should explain clearly to them that their behaviour is not welcome or makes you uncomfortable. If this is too difficult or embarrassing, you should speak to the Course Director, who can provide confidential advice and assistance in resolving the issue formally or informally.
3. If informal steps are not appropriate, or have not been successful, you should raise the matter formally under OGE's Complaints Management Policy.
4. OGE will investigate complaints in a timely and confidential manner. The investigation will be conducted by someone with appropriate experience and no prior involvement in the complaint, where possible.
5. Details of the investigation and the names of the person making the complaint and the person accused must only be disclosed on a "need to know" basis. We will

consider whether any steps are necessary to manage any on-going relationship between you and the person accused during the investigation.

6. Once the investigation is complete, we will inform you of our decision. If we consider you have been harassed or bullied by a member of staff the matter will be dealt with under the Student Disciplinary Policy as a case of possible misconduct or gross misconduct. If the harasser or bully is a third party such as a tutor/contractor, other student or visitor, we will consider what action would be appropriate to deal with the problem. Whether or you're your complaint is upheld, we will consider how best to manage any on-going working relationship between you and the person concerned.

## Anti-Bullying Policy

We believe that all students have the right to live and be educated in an environment which is supportive, caring and safe, and where there is mutual respect, courtesy, kindness and co-operation. Bullying is anti-social behavior and it will not be tolerated in any form by Oxford Global Exchanges. This policy has been developed with regard to the duties and obligations under existing legislation and for the safeguarding and well-being of all students.

### Forms of Bullying

1. Bullying is deliberately hurtful behaviour to someone as a single incident or over a period of time. It can be either physical, verbal or indirect or a combination of any of these forms.
2. Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened.
3. Power does not always mean being in a position of authority but can include both personal strength and the power to coerce through fear or intimidation.
4. Bullying can take the form of physical, verbal and non-verbal conduct.
5. Bullying may include, by way of example:
  - a) Physical or psychological threats;
  - b) Overbearing and intimidating levels of supervision; or
  - c) Inappropriate derogatory remarks about someone's performance.
6. Cyber-bullying includes the use of Information and Communication Technologies (ICT) in the following ways:
  - a) Texting or emailing unpleasant, frightening, offensive or derogatory mobile phone messages;
  - b) 'Sexting', where sexually inappropriate mobile phone pictures and messages of one person are used by another person to upset, harass or demean the person in the pictures;
  - c) Posting abusive or demeaning comments on social networking sites such as Facebook, WeChat, and Twitter, or in chat rooms.
7. Sexual and sexist bullying includes

- a) Making any offensive, derogatory or demeaning comment or innuendo to a person linked to their gender, sexuality or sexual activity;
  - b) Displaying sexual or pornographic pictures on any electronic device with intent to insult, demean or harass another person; or
  - c) Any unwanted physical conduct or coercion into a sexual act.
8. Racist and religious bullying includes making any offensive, derogatory or demeaning comment to a person linked to their race, nationality, ethnicity, religion or belief, or cultural practices.
  9. Homophobic bullying includes making any offensive, derogatory or demeaning comment or innuendo to a person linked to their sexuality (or perceived sexuality) to upset, harass, humiliate or isolate that person.
  10. Disability bullying includes making any offensive comment or physical interference towards another person who has a mental or physical disability or a learning difficulty, whereby that disability or learning difficulty is exploited with the intent to upset, harass, humiliate or isolate that person.

### **Tackling Bullying**

All complaints of bullying will be taken seriously, investigated, dealt with appropriately, effectively, sensitively and as confidentially as possible, and responded to in a consistent manner.

1. Prevention - The following procedures are intended to discourage bullying in all its forms.
  - a) Un-authorized absence from class will be reported by the Tutor to the Course Director.
  - b) Poor academic performance is monitored and addressed by the Course Director.
  - c) Course Director will see any member of their group, by appointment, during the day, who wishes to discuss any personal problem with them.
  - d) Course Director will be informed of any one in their group who has reported or is suspected of being bullied or bullying, and asked to monitor the situation.
  - e) The issue of bullying and anti-social behaviour will be addressed in Course Director meetings,
  - f) Any student whose behavior is a cause for concern will be discussed at a meeting between the Course Director, and the Executive Director.

- g) Students will be advised that staff members do have the ability to stop bullying and are encouraged to speak to them.
  - h) Students will be advised that anyone who feels that they are being bullied, or who knows that someone else is being bullied, should tell any member of the academic, pastoral or residential Staff. The disclosure will be passed onto and dealt with by the Course Director in the first instance.
2. Preventative Measures to stop cyber-bullying:
- a) Guidance is offered on the safe keeping of names, addresses, passwords, mobile telephone numbers and other personal details.
  - b) Mobile telephones are to be used with discretion and not in lessons unless expressly for teaching purposes, as directed by the Course Director.
  - c) The use of cameras on mobile telephones is not allowed in seminars (unless with express permission) nor in washing and changing areas.
3. Recording, reporting and monitoring bullying:
- a) Students are encouraged to report incidents of bullying to any staff member of their choice.
  - b) Students may also choose to give information anonymously by a note.
  - c) All incidents of bullying should be recorded and reported to Course Director. The Course Director should be copied into all reports.
  - d) Where students have been involved in a bullying incident, they will be observed to ensure that the behaviour is not repeated.
4. Dealing with a report of bullying:
- a) Reports of bullying, where received by a named student should be reported to the Course Director.
  - b) The Staff Member receiving the report should ensure the immediate well-being of the student reporting the incident.
  - c) Where reports of bullying are made anonymously then they should be discussed in a confidential meeting of the Course Directors to establish whether the victim can be identified where they can procedures should follow as normal.
  - d) Where the student cannot be identified all Staff should continue to monitor their groups as normal for signs of bullying occurring.
  - e) All reports should be dealt with as confidential within the Staff body.

5. Dealing with observations of bullying:
  - a) If a Member of Staff observes, or believes they observe bullying then they must to intervene immediately to end the instant instance of the behaviour.
  - b) Staff should take the names of all involved.
  - c) Staff should ensure the immediate well-being of the suspected victims of the incident.
  - d) Students who have been bullied will be supported in the following ways:
    - i. Being offered an immediate opportunity to discuss what happened, particularly their feelings, with their Course Director or any staff member of their choice.
    - ii. Being reassured that they have done the right thing by reporting the incident, if applicable, and that OGE will be investigating the incident and taking it seriously.
    - iii. Being offered on-going and continuous support, if appropriate.
    - iv. Working together to restore their self-esteem and confidence, if appropriate.
    - v. Using the services of an external counsellor, if appropriate.
6. Students who have been bullied will be helped in the following ways:
  - a) Discussing what happened and discovering why they became involved.
  - b) Exploring different perspectives of the incident, as appropriate.
  - c) Establishing all hurtful and offensive behaviour and the need to change.
7. OGE will impose sanctions on students who have bullied in accordance with its Student Discipline Policy. The type of sanction will depend upon the severity of the incident. Where appropriate, and only with the consent of the victim, in addition to sanctions, OGE will arrange a conciliation meeting with the students involved in the bullying to facilitate their well-being and the cohesion of the group and the course.

### **PREVENT Policy - Radicalisation and Extremism**

1. Under the Counter Terrorism & Securities Act 2015 has a responsibility to have due regard to the need to prevent people from being radicalised or drawn into terrorism. This initiative is known as PREVENT and it is designed to try and reduce the likelihood of people supporting terrorism or becoming terrorists. It also aims to reduce the risk of radicalization happening within institutions.

2. PREVENT Terminology and Responsibility.
  - a) Radicalisation: the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind.
  - b) Extremism: holding extreme political or religious views which may deny rights to any group or individual. Can be expressed in vocal or active opposition to core British values. Extremism can refer to a range of views, e.g. racism, homophobia, right-wing ideology, any religious extremism.
  - c) Core British Values:
    - i. Democracy
    - ii. The rule of law
    - iii. Individual liberty
    - iv. Mutual respect and tolerance of different faiths or beliefs (compliant with the Equality Act 2010)
3. OGE meets this responsibility by educating staff in the terminology and the risks. If any member of staff is concerned that a student is showing signs of becoming radicalised and involved in an organisation which could ultimately harm the student, then this needs to be reported to the Designated Safeguarding Officers.

### **Guidance for Staff in Handling a Disclosure**

1. Suspecting a student may be at risk of harm

There will be occasions when you suspect that a student may be at risk, but you have no quantifiable evidence. In these circumstances, you should try to give the student the opportunity to talk or communicate in their preferred method. It is fine to ask the student if they are 'okay' or if you can help in any way.

2. If a student discloses to you

If a student communicates to you any risks around their safety or wellbeing you must let them know that you must pass the information on. During your conversation:

- a) Allow them to speak freely
- b) Remain calm with composed reactions
- c) Give reassuring nods or words of comfort
- d) Do not be afraid of silences

- e) Under no circumstances ask investigative questions
- f) At an appropriate time tell the student that in order to help them you must pass the information on
- g) Do not automatically offer any physical touch as comfort

## Equality, Discrimination and Disability Policy

All staff and students should be able to enjoy a work environment free from all forms of discrimination including race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation, age, disability, gender reassignment, citizenship, marital or civil partner status, pregnancy or maternity or any other characteristic protected by law (hereinafter referred to as "Protected Characteristics"); including harassment.

Thus, OGE strictly prohibits and will not tolerate any such discrimination or harassment by any of its staff or students. Any staff or student who feels they are a victim of such discrimination must follow the procedures set forth in this procedure and/or the Anti-Harassment Policy as applicable.

### Discrimination

1. Staff must not unlawfully discriminate against or harass other people including current and former Staff, job applicants, clients, students and visitors. This applies in the workplace, outside the workplace (when dealing with students, customers or other work-related contacts), and on off-site trips or events, including social events.
2. The following forms of discrimination are prohibited under this policy and are unlawful:
  - a) Direct discrimination: treating someone less favourably because of a Protected Characteristic;
  - b) Indirect discrimination: a provision, criterion or practice that applies to everyone but adversely affects people with a Protected Characteristic more than others and is not justified;
  - c) Harassment: this includes sexual harassment and other unwanted conduct related to a Protected Characteristic, which has the purpose or effect of violating someone's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. Harassment is dealt with further in our Anti-harassment and Bullying Policy.
  - d) Victimisation: retaliation against someone who has complained or has supported someone else's complaint about discrimination or harassment.
  - e) Disability discrimination: this includes direct and indirect discrimination, any unjustified less favourable treatment because of the effects of a disability, and failure to make reasonable adjustments to alleviate disadvantages caused by a disability.

### **Transgender Staff and Students**

1. OGE supports transgender students and staff in their right to be accommodated with students of the gender they identify with.
2. If a student defines as a gender non-conforming individual, including but not limited to non-binary or gender-fluid, they have the right to choose which accommodation they would like to be accommodated in.

### **Breaches of this Policy**

1. We take a strict approach to breaches of this policy, which will be dealt in accordance with our Student Disciplinary Policy. Serious cases of deliberate discrimination may amount to gross misconduct resulting in dismissal.
2. If you believe that you have suffered discrimination you can raise them through our Complaint Management Policy or Anti-Harassment Policy. Complaints will be treated in confidence and investigated as appropriate.
3. You must not be victimized or retaliated against for complaining about discrimination. However, making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our Student Disciplinary Policy.

### **Disabilities**

OGE is committed to equality of opportunity for disabled people in accordance with its legal duties. If you are disabled or become disabled, we encourage you to tell us about your condition so that we can consider what reasonable adjustments or support may be appropriate.

### **Definition of Disability**

Disability is defined as a physical or mental impairment that has a substantial and long-term negative effect on the ability to perform normal daily activities, as defined by The Equality Act 2010. This does not include addiction to, or dependence on, alcohol or non-prescription drugs.

### **Programme Participants**

1. It is the policy of OGE to ensure that no programme applicant or student receives less favourable treatment on the grounds of a disability. This applies to:
  - a) accessibility of application forms;
  - b) application requirements;
  - c) admission to the course;
  - d) terms of admission to the course, including cost;

- e) discrimination arising from a disability;
- f) harassment;
- g) victimisation; and
- h) dismissal from the course, discipline, and grievances.

### **Physical Access**

1. The College sites at which OGE courses are held, may include old buildings of more than one level and without lifts. Students are required to move around the site in order to access their lessons, activities, the common room and sleeping areas. Students with impaired mobility need to be notified to the Course Director immediately in order to make the necessary arrangements.
2. OGE will wherever possible make reasonable adjustment to mitigate against these necessary constraints.

### **Education**

1. Staff will continue to be made aware of students with disability or special educational needs by the Course Director.
2. Staff will need to adapt their teaching to the learning patterns of all the students according to their abilities and needs.
3. The implementation of reasonable adjustments to classroom management, teaching and expectations, should not prejudice the progress of other students or their health and safety.
4. OGE is not required under legislation to provide auxiliary support such as a classroom assistant, or auxiliary aids.

### **Welfare Awareness**

Staff and students are to be made aware of disability and understand its effects and accept and support disabled students as part of the programme's life. This should be emphasised at the start of each course in the Induction.

## Data Protection and Privacy Policy

Oxford Global Exchanges (OGE) is committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. We have always had a robust and effective data protection programme in place which complies with EU General Data Protection Regulation (GDPR) and the UK's Data Protection Bill.

OGE needs to gather and use certain information about individuals. These can include contractors, business contacts, staff members, tutors, students, and other people OGE has a relationship with or may need to contact.

"Personal data" means recorded information we hold about you from which you can be identified. It may include contact details, other personal information, photographs, expressions of opinion about you or indications as to our intentions about you. "Processing" means doing anything with the data, such as accessing, disclosing, destroying or using the data in any way.

### Data collection and purposes

1. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:
  - a) Identity data: includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
  - b) Contact data: includes billing address, delivery address, email address and telephone numbers.
  - c) Financial data: includes bank account and payment card details.
  - d) Transaction data: includes details about payments to and from you and other details of products and services you have purchased from us.
  - e) Technical data: includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
  - f) Profile data: includes purchases or orders made by you, your interests, preferences, feedback and survey responses.
  - g) Usage Data: includes information about how you use our website, products and services.



- never shared between staff members;
- b) if data is stored on removable media, these should be kept locked away securely when not being used;
- c) Data should only be stored on designated drives and servers and only uploaded to an approved cloud computing service;
- d) Data should be backed up frequently and the backups should be tested regularly;
- e) Data should never be saved directly to mobile devices like tablets or smartphones;
- f) All servers and computers should be protected by approved security software and a firewall.

### **How we deal with your data**

#### 1. Why we need your information

- a) Academic - We require the normal academic background information needed to assess initial suitability for admission to our programme. This information is used only to form a judgement as to your suitability for the programme and optimizing your programme learning experiences. All information about unsuccessful applicants' details is securely erased from our records forthwith.
- b) Non-academic – All other information we require is directly related to safety and welfare considerations, such as parental contact, medical and allergy information.

#### 2. How it is used

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- a) Where we need to perform the contract, we are about to enter into or have entered into with you.
- b) Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- c) Where we need to comply with a legal obligation.

#### 3. Who your information is disclosed to

- a) Your information is disclosed to the relevant staff dealing with the admission of students. Under no circumstances is your information disclosed to any third party except in circumstances required for the purpose of enhancing your

learning experiences on the programme, safety and welfare, accreditation requirements or demanded by law.

- b) Personal information about allergies and medical conditions will be made available to partners on the programme as required for your safety and welfare.
  - c) An aggregated version of participants' academic backgrounds may be shared with the staff of universities we will visit during the programme, for the purpose of better tailoring the visit to our students' overall needs.
  - d) The law allows for, in certain situations, personal data to be shared with law enforcement agencies without the consent of the data subject. In these circumstances OGE will disclose the requested data, but only after ensuring that the request is legitimate and where necessary taking legal advice.
4. Safeguarding measures to protect your information
- a) All your information is stored on password protected, up to date computers that have reliable antivirus and anti-hacking protection. Any hard copies are kept in secure locked filing cabinets accessible only by the directors.
  - b) We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

#### 5. Data Retention

We will only retain your personal data for three years unless we are reasonably required to hold the data for a longer period to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements or in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

#### 6. Your rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, as listed below.

- a) Request access to your personal data.
- b) Request correction of your personal data.
- c) Request erasure of your personal data.
- d) Object to processing of your personal data.
- e) Request restriction of processing your personal data.

- f) Request transfer of your personal data.
- g) Right to withdraw consent.

**International transfer**

1. We may share your personal data within OGE, and this may involve transferring your data outside the European Economic Area ("EEA ").
2. Whenever we transfer your personal data out of the EEA, we ensure an appropriate degree of protection is afforded to it by implementing suitable safeguards, and the data may be transferred only to the extent necessary for continuing our activities.
3. OGE will put contracts in place with overseas partners to ensure that data is processed to a similar standard of data protection as required by UK legislation.

## Complaint Management Policy

OGE is committed to providing a professional, efficient, courteous and helpful service to all our students. We welcome any comments or suggestions you may have on how we can improve. If you believe that things have gone wrong and you are dissatisfied with our service, we want you to tell us. Then we can resolve your complaint and try to ensure it does not happen again. This procedure tells you how to make a complaint about any of our courses, including excursions, activities and accommodation. Hard copies of this document are available on request in office.

### Complaints Procedure:

1. If there is any problem with your course, we want to be the first to hear about it:
  - a) If you're experiencing a problem during the course, then please contact your Course Director.
  - b) If you're experiencing a problem before or after the course, then please contact admissions at [exchanges@oge-programmes.org](mailto:exchanges@oge-programmes.org)
  - c) It is essential that you contact us as soon as possible so that we can try to rectify the situation on the spot. You may be able to resolve your complaint by taking it up immediately with the individual provider concerned.
  - d) In the unlikely event that the matter remains unresolved after 5 working days, then please contact us in writing to:  
Address: 208 Roger Dudman Way, Oxford, OX11GB.  
Email: [exchanges@oge-programmes.org](mailto:exchanges@oge-programmes.org)
  - e) Or you can ask to speak with a Senior Staff, and we will do our utmost to find a satisfactory solution.
  - f) You can also call us at 01865304033, although you may be asked to put the details of your complaint in writing.
2. When you make your complaint, you should include:
  - a) Your name and address;
  - b) The name and date of the course you attended;
  - c) Copies of any relevant correspondence about the complaint;
  - d) The name of any person who you have already written or spoken to, and when, in relation to the complaint, to help us find and relevant papers and/or phone logs etc as appropriate;

- e) Details about what has gone wrong or has not been handled properly; and an explanation of how you would like us to resolve your complaint.
  - f) Use objective language to clearly state the facts
  - g) Present information (where possible) in chronological order.
3. After you submit your complaint:
- a) We will respond in writing to your complaint, within 10 working days of receiving it.
  - b) If this is not possible, we will, within 5 working days, send you an acknowledgement explaining why.
  - c) we cannot provide you with an immediate response, including details of when you can expect a full reply. All complaints are logged on our database and then tracked to completion.
4. If an investigation is needed regarding to your complaint:
- a) The complaint should be investigated swiftly and without undue delay.
  - b) The investigation should be collaborative, with an aim of establishing the facts of the matter regarding which a complaint has been made.
  - c) Due attention should be paid to all other policies in the conducting of the investigation.
  - d) The investigation should be documented to a level sufficient for a clear review of its method and findings.
  - e) Following the investigation, and within one day of completion, the investigator will:
    - i. Where necessary, convene a meeting with the complainant in order to discuss the outcome of the investigation and any action to be taken;
    - ii. Send a full written response to the complaint detailing the outcome of the investigation and any action to be taken; and
    - iii. Inform the complainant of their right to a review if they are unsatisfied with the action taken.

## Student Attendance Policy

It is important that students are present for all compulsory activities and that staff are always aware of their whereabouts. Daily attendance taking must be adhered to by all staff and students:

1. All students must check-off their attendance in class by 9:30am
2. All students must check-in daily after they return to the accommodation in the evening by 9:30pm.
3. Programme Coordinators will check that all students are present at the beginning of every compulsory group lecture or activity. Students will be guided to and told in advance when and where they will be expected to be present
4. Students must sign-out with their designated Programme Coordinator when they are permitted unsupervised free time (such as on the weekends). They must then sign back in when they return.
5. In addition, all students must carry their mobile phone and provide the number in which OGE staff will always be able to reach each student if necessary. Students must remain contactable throughout the day, ensuring their phone is sufficiently charged.

## Student Discipline Policy

OGE requires all students to abide by a set of common rules, regardless of course type. All the rules are in place to protect students and to ensure that all our students are able to make the most of their time with us.

### General Guidelines

- a) Safety—don't do anything that could put yourself or others in danger. Make sure a member of staff always knows where they are.
- b) Respect – treat other people and the college with respect
- c) Organisation – be prepared for lessons and activities. Be punctual.
- d) Instructions – follow all instructions given by OGE staff and members of the college.
- e) Effort – make a good effort during the course to get the most out of it.

### Rules and Discipline

1. Failure to comply with the programme rules, provided in the Student Handbook, and Student Rules will lead to OGE taking disciplinary action. This includes a series of steps, clearly described below, which can lead to dismissal from the course depending on how bad the behavior.
2. OGE reserves the right to amend these rules as it sees fit. The rules are not designed to be exhaustive and where an action falls outside of the scope of these rules, OGE reserves the right to initiate disciplinary sanctions, which are listed below.

### Sanctions

1. Staff have full discretion in what level of sanction to apply. Being honest and genuinely remorseful may lead to less serious sanctions being imposed, whilst being dishonest may make matters worse. We will also consider your previous conduct and levels of engagement with the course when deciding the most appropriate sanction.
2. The levels of sanctions at OGE are: Warning, Minor Sanctions, Major Sanctions, Final Warning, and Dismissal.

### Warnings

1. Warnings can be given by any member of staff if they are unhappy with any aspect of your behaviour that goes against the rules. The staff member will make a record

of this, and may speak to the Course Director, but no further action will be taken if you don't break the rules again.

2. Warnings will be given for any behaviour contradictory to the five guidelines you have been given; Safety, Respect, Organisation, Instructions and Effort. Being late, behaviour likely to disturb others on college and other venues and being disorganised are examples of actions that will result in a warning.

### **Minor Sanctions**

Minor Sanctions may involve a loss of privileges or missing an activity. The Course Director will take the decision to impose minor sanctions and will decide what these sanctions will be. Minor sanctions may be imposed if:

- a) You have already been warned but you continue to break the rules, or
- b) There is a serious infringement of the rules.

### **Major Sanctions**

Major Sanctions are similar to minor sanctions but for a longer duration/greater impact and your parents will be contacted. Bullying, rudeness, and leaving site without permission are examples of behaviour that will lead instantly to a major sanction. They will be imposed if:

- a) You continue to break the rules after minor sanctions have been imposed, or
- b) There is a serious infringement of the rules, likely to have had an impact on others and/or your safety and/or wellbeing.

### **Final Warnings**

1. Final Warnings involve a meeting with the Course Director, and in certain cases the Executive Director. You will have to sign an agreement acknowledging that this is a Final Warning. Your parents/guardian will be informed. Further sanctions may also be imposed.
2. Possession of banned items will lead automatically to a Final Warning (and, potentially, instant dismissal) as will serious instances of bullying and rudeness. A Final Warning will be imposed if:
  - a) You continue to break the rules after major sanctions have been imposed, or
  - b) There is a very serious infringement of the rules which calls into question your suitability to remain on the Programme.

### **Dismissal**

1. Dismissal will be imposed for the most serious of disciplinary issues or sustained

unacceptable behaviour.

2. If you are dismissed from the course, you will be sent home at the expense of yourself, as early as practically possible.
3. You may be excluded from teaching and activities before you leave, and you may be required to move to a room off campus if you cannot be put on a flight back home that day.
4. You are likely to be dismissed if we believe you remaining on the course would pose a risk to your own or other students' welfare, or if you break UK law.

## **Trips and Activities Policy**

Programmes at Oxford Global Exchanges may contain off-site trips and activities. It is important that staff are aware of their responsibilities and that students' safety and welfare is upheld at all times.

### **Before the trip or activity**

1. If any visit involves any element of dangerous activity, the relevant risk assessment should be consulted.
2. The relevant risk assessment will be consulted before any day trip.

### **Staffing Matters**

1. Staff accompanying the trip are responsible for the behaviour and wellbeing of students.
2. Trips must be preceded by a staff brief covering:
  - a) Risk assessment
  - b) Timings
  - c) Emergency procedures
  - d) Student medical needs
  - e) Relevant contact numbers
  - f) Itinerary
  - g) The designated lead for each coach

### **The Trip**

1. A register must be taken at the following occasions:
  - a) Before boarding any transport
  - b) On arrival at the destination
  - c) On regrouping
  - d) At any point when the journey is broken
  - e) On departure
  - f) Once all the occupants are on the bus, the doors must be closed and a final name check and head count done. This is the responsibility of the designated

group leader of each bus.

2. Every check should be by name and not just by a “head count”.
3. When using transport staff must ensure all seat belts are fastened and students remain on their designated bus.
4. Staff are responsible for upholding good behaviour on any transport including:
  - a) Not dropping litter.
  - b) Abiding by drivers’ rules including food and drink.
  - c) Alcohol is not consumed on any transportation.
5. A staff member must be the first off the coach or out of the minibus to guide students off safely.

### **On Arrival**

1. A central meeting point is established and communicated to students.
2. Students are reminded:
  - a) What to do if lost
  - b) Emergency procedures
  - c) Timings they need to adhere to

### **Incidents**

All incidents should be dealt with and recorded according to the same incident reporting procedure used throughout the programme.

## Missing Student Policy

### Preventative measures

1. All staff members are always required to keep track of all students assigned to their group. If the student has free time, you must make it clear on when they are expected to meet with the group again.
2. Roll call your students by name, regularly. You must do this:
  - a) Every morning
  - b) Every evening
  - c) Before getting onto transport
  - d) After getting onto transport
  - e) Before going into a visit location
  - f) Before leaving a visit location
  - g) Whenever you have moved the group through a busy area
  - h) Use common sense in roll calling at necessary times
  - i) Have a list of your students for all trips and visits
  - j) Reinforce the policy that no student may leave his or her group for any reason without speaking to the supervising staff.
  - k) Reinforce the practice that other students in the group should tell the supervising staff if they notice that their course-mate or anyone else in the group is not present.
  - l) Do not become so involved in the activity at hand that the staff member loses track of the participants. Always know where everyone is.

### Should a student go missing

If a student goes missing, the following steps must be followed:

1. On a trip or visit:
  - a) Remain calm to avoid disquieting the other students
  - b) Call the student's mobile phone
  - c) Stop the activity and ask the students about the last time they saw the missing

student and if they know where he or she went. If no one knows, pull the group together, have them sit on the ground or floor, tell them that you will be right back to restart the activity, and leave them with one of the helpers. Never leave the group alone.

- d) Call for back-up if no helper is present. Call the Course Director and tell him or her that you are beginning a contained search in the immediate area.
- e) Don't hesitate in seeking help to track a student down. This could be a policeman in the vicinity, visit attraction employee, etc - I.e. anyone who can help secure the area and co-ordinate others to help. Provide the name, basic characteristics of the student (hair colour, age, size, weight), any description you may have that would help others search (such as clothing that he or she was wearing), and how long it has been since anyone has seen the student.
- f) Call the Course Director, Head Office or Executive Director. Make sure that you speak to someone. Don't just leave a message. Additional support will be brought to you as soon as possible.

2. Inside the college:

- a) Check with student's friends, roommate, all staff members etc. Have two staff members check the student's room.
- b) Search the immediate premises including halls, toilets, and other activity areas. Call the student's name as you search.
- c) Inform the porters to help watch the exits to prevent the missing student from leaving the site.
- d) Go outside and do a sweep around the perimeter of the building.
- e) If student is still not found and has not responded to calls/texts, inform the lodge.

3. In all cases:

- a) Keep calling the student's mobile
- b) Keep all staff up to date, at all times
- c) As soon as you feel that you have exhausted the obvious options, report the matter to Course Director/Head Office/Executive Director.
- d) Tell everyone involved as soon as the student is found.
- e) If the police become involved, the parent should be informed by OGE.

## Alcohol and Drug Misuse Policy

OGE is committed to providing a safe, healthy and productive environment. This includes ensuring that all students are fit to carry out their courses safely and effectively in an environment which is free from alcohol and drug misuse and that students are aware of, and abide by, the rules relating to alcohol and drugs.

### Key Principles:

1. All students are aware of their responsibilities regarding alcohol and drug misuse and related problems.
2. Students who have an alcohol or drug-related problem are encouraged to seek help, in confidence, at an early stage.
3. This policy applies to incidents or offences caused by alcohol or drug misuse at or outside colleges and living accommodations which may damage our reputation, and students who are likely to be dealt with under our Student Discipline Policy.
4. We will not accept students over 18 being under the influence of alcohol to the extent that it impairs/interferes in any way with their ability to engage with any aspect of the course. We will not accept students over 18 being under the influence of drugs at any point during their time with us.
5. This policy covers all staff, tutors, students, contractors and related workers.
6. Staff must not, under any circumstances, supply any student at OGE courses with alcohol outside of un-timetabled activities and never for under-18-year-olds.

### Searches

1. We reserve the right to conduct searches for drugs or alcohol on College and accommodation site premises, including, but not limited to, searches of lockers, filing cabinets and desks, bags, clothing and packages.
2. Any drugs or alcohol (if the student is under 18) found as a result of a search will be confiscated and action may be taken under the relevant disciplinary procedure.

### Student Consumption and Possession of Alcohol

1. Students over the age of 18 must not consume alcohol on the College or accommodation site unless it is in the Bar areas. Alcohol must not be consumed in students' rooms on the College site;
2. Any student who turns 18 whilst on the course will be considered to be under the age of 18 for the purposes of this policy throughout their time at OGE courses.

## Smoking Policy

OGE is committed to protecting the health, safety and welfare of all staff and students by providing a safe place of work and protecting all students, workers, service users, from exposure to smoke. All of our workplaces are smoke-free in accordance with the Health Act 2006 and associated regulations. All Staff, students and visitors have the right to a smoke-free environment.

### **Where is Smoking Banned?**

Smoking is not permitted at any time anywhere in the workplace, on the college site or (for course-delivery staff) in the presence or sight of students. The ban applies to anything that can be smoked and includes, but is not limited to, cigarettes, electronic cigarettes, pipes (including water pipes such as shisha and hookah pipes), cigars and herbal cigarettes.

### **Where is Smoking Permitted?**

On-course staff and students over 18 years of age may only smoke outside, outside of College and accommodation grounds and not in the presence of students during breaks. When smoking outside, staff must dispose of cigarette butts and other litter appropriately. Students under 18 years of age must not smoke at any point while at OGE programmes.

### **Breaches of this Policy**

Breaches of this policy by any staff member will be dealt with under our Student Disciplinary Policy and, in serious cases, may be treated as gross misconduct leading to summary dismissal. Breaches of this policy by students will be dealt with under our Student Discipline Policy, Student Rules and Short Course Agreement. Smoking in smoke-free premises or vehicles is also a criminal offence and may result in a fixed penalty fine and/or prosecution.