

# Craol Community Radio Forum of Ireland

# **Policies and Procedures**

Craol

OMMUNITY RADIO FORUM OF IRELAND, MONKSLAND BUSINESS PARK, ATHLONE, CO. ROSCOMMON

# **Craol Community Radio Forum of Ireland Society Ltd Policies and Procedures**

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# **Appeals Policy**

# 1. Introduction

This policy sets out the principles, circumstances, grounds and possible outcomes of an appeal made by a learner or member of staff ('trainer') against a decision made by Craol Community Radio Forum of Ireland Society Ltd, hereafter referred to as Craol, or any higher education body, in regard to modules delivered by Craol trainers. All appeals are treated in confidence and details will not be available to other parties.

This policy is available on request by contacting Craol at:

The Project Coordinator Craol- The Community Radio Forum of Ireland Society Ltd, C/O Involve CLG, Monksland Business Park, Athlone, Co. Roscommon N37 VX52 Or by email to: qqi@craol.ie

#### 2. Scope of policy.

This policy applies to learners who wish to make an appeal against decisions made by Craol or any higher education body affiliated with Craol's modules, regarding assessment or marks/results. It also applies to all staff in the conduct of appeals decisions.

#### 3. Date of Issue and review

This policy was implemented on April 2008. This policy was reviewed in September 2022 and will be reviewed annually.

#### 4. Procedure for making appeals

Appeals should be made in writing to the Craol Project Coordinator at the above address, or via email, at <u>qqi@craol.ie</u>. Please use the Craol Appeals Form which is available from the module trainer and in the learner handbook.

Please mark your correspondence clearly as APPEAL and provide as much information as possible to enable a thorough investigation to be carried out.

#### Learners should include the following information:

- Name of learner.
- Name of trainer.
- Title of the Course
- Nature of the appeal.

# 4.1 Appealing results decisions

- All learners will be provided with details outlining the appeals process prior to assessment.
- A learner may make an appeal if they are unhappy with the grade they were awarded.
- Learner must submit the Appeal Form within fourteen days of receiving their provisional results.
- Appeals are subject to a fee of 20 euros which is refundable if the result is favourably adjusted.
- Only evidence that has been previously presented by the learner can be part of an appeal. No new evidence can be submitted.

- It is the responsibility of each center to ensure that all appropriate assessment evidence as required by the module descriptor is available for the appeal.
- Any evidence not available will be assumed not to have been complete.

# 4.2 Appeals Process

# In the case of an appeal regarding results:

- a) The learner should first raise the matter with the trainer and attend a meeting where both learner and trainer can discuss the matter.
- b) In the case that learner and trainer agree with the original mark the marking may stand. A report is written up, signed by the trainer and learner and submitted to the Project Coordinator.
- c) In the case that the learner is still dissatisfied with assessment decision and wishes to challenge the outcome of result, they are then required to submit the Appeals Form to the Craol Project Coordinator.
- d) An independent appeals panel is appointed to review the learner's work. Members of the appeals panel will not have been involved in the original decision.
- e) A report will be produced, and outcomes communicated to the learner and trainer by the Project Coordinator within 21working days of receipt of appeal.
- f) If your appeal is successful, the Project Coordinator will ensure that your grade is changed on the QQI system and will appear on your certificate and your fee will be refunded.
- g) The results of the appeals panel is final.

# In the case of an appeal regarding a Recognised Prior Learning decision:

- a) The prospective learner should apply in writing to the Craol Quality Assurance Committee within 5 working days, setting out their reasons for appealing the decision and any accompanying documentation.
- b) The Quality Assurance Committee will respond within 5 working days.
- c) The decision of the Quality Assurance Committed is final.

# 5 Administrative Process

In the case of results appeals the appellant will be contacted within 21 working days from the date of receipt of appeal by Craol. In the case of RPL appeals the appellant will be contacted within 5 working days. If no response to the appeal decision is received within 10 days of the decision being communicated to the appellant, Craol will close the appeal and no further correspondence will be entered into.



# **Learner Complaints Policy**

# 1. Introduction

This policy sets out the principles, circumstances, grounds and possible outcomes of a complaint made by a learner regarding issues other than assessment decisions, which are dealt with in the Craol Appeals Policy. Craol Community Radio Forum of Ireland Society Ltd, is hereafter referred to as Craol, Appeals Policy. All complaints are treated in confidence and details will not be available to other parties.

This policy is available on request by contacting Craol at:

The Project Coordinator Craol- The Community Radio Forum of Ireland Society Ltd, C/O Involve CLG, Monksland Business Park, Athlone, Co. Roscommon N37 VX52 Or by email to: qqi@craol.ie

#### 2. Scope

This policy applies to learners who wish to make a complaint relating to alleged discrimination, bullying, non-professional practice or complaints regarding facilities, i.e., training rooms, studio equipment etc. It also applies to all staff in the conduct of complaints processes and decisions.

#### 3. Date of Issue and review

This policy was implemented on April 2008 and reviewed on September 2022. The policy will be reviewed annually.

#### 4. Procedure for making a complaint.

Complaints should be made in writing to the Craol Project Coordinator at the above address. Or via email at: qqi@craol.ie. Please mark your correspondence clearly as COMPLAINT and provide as much information as possible to enable a thorough investigation to be carried out.

#### Learners should include the following information:

- Name of learner.
- Name of trainer.
- Course Title
- Name of advocate (if applicable)
- Nature of the complaint.

# 5. Complaints Procedures

- 5.1 Learners may bring the issue to the trainer. If they wish they may have an advocate accompany them. If the matter is resolved at this stage the trainer will record the nature of the complaint and the resulting outcome.
- 5.2 If the matter cannot be resolved by speaking to the trainer the learner may then approach the station manager. The learner may have an advocate accompany them at this stage. If the matter is resolved

the station manager will record the nature of the complaint and the resulting outcome. The advocate (if applicable) may contribute to this procedure.

- 5.3 If the matter cannot be resolved the learner may bring the issue to the Craol Project Coordinator, using the official complaint form. This form must be signed by the learner and module trainer. (See Complaint Form at bottom of policy.)
- 5.4 On receipt of the complaint the Project Coordinator will organize a meeting between a Craol representative, module trainer, learner and if the learner wishes an external advocate.
- 5.5 If the matter can be resolved in a timely and satisfactory manner the complaint and the minutes of the meeting will be documented in accordance with GDPR and Craol Data Protection and Data Retention guidelines.
- 5.6 Should the matter not be satisfactorily resolved at this stage; it will be referred to the CCC and/or Academic Committee.
- 5.7 If the matter cannot be resolved the learner has the right to take their complaint to the relevant external agency.

# Administrative Process

Learners will be informed of the result of their complaint in writing by the Craol Project Coordinator within 21 working days from the beginning of the process. If the leaner is unhappy or disagrees with the resulting outcome, they must respond to the correspondence within 21 working days. If no response to the decision is received within 21 days of the decision being communicated to the complainant Craol will close the complaint and no further correspondence will be entered into. All data relevant to the process will be maintained in accordance with Craol and GDPR guidelines.

# Contacting the regulatory authorities.

If a learner is unhappy with the decisions reached, they may contact the relevant regulatory authority.



# Malpractice & Maladministration Policy

# Introduction

Craol Community Radio Forum of Ireland Society Ltd, hereafter referred to as Craol, has a professional responsibility to ensure that any malpractice or maladministration is identified, reported, and dealt with in a transparent and consistent manner. Following a thorough and fair investigation, any non-adherence to this policy should be reported to the awarding organisation, QQI.

#### Scope of policy

This policy is directed to Craol learners, trainers, and station management. It is also aimed at all administration staff to ensure that they deal with all malpractice and maladministration investigations in a consistent manner.

This policy sets out the steps to follow when reporting suspected or actual cases of malpractice and maladministration.

This policy is available on request by contacting the Craol Project Coordinator at:

Craol- The Community Radio Forum of Ireland Society Ltd. C/O Involve CLG Monksland Business Park Athlone Co. Roscommon N37 VX52

Or by contacting Craol by email at <u>qqi@craol.ie</u>

#### Date of issue and review:

This policy was implemented on April 2008 and reviewed on September 2022. This policy may be updated in the light of operational feedback to ensure our arrangements for dealing with suspected cases of malpractice and maladministration remain effective. It will be reviewed annually in line with Craol's practice of regular self-evaluation arrangements and revised as and when necessary, in response to feedback, best practice and changes in legislation.

# **Definitions of Malpractice:**

Malpractice is any activity or practice which deliberately contravenes Craol, QQI or other statutory, voluntary legislative regulations and compromises the integrity of the assessment process and/or the validity of certificates. For the purpose of this policy this term also covers professional misconduct.

#### **Definition of Maladministration:**

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

In the case of malpractice regarding Equality Opportunity or Reasonable Adjustments and Special Considerations please see the following policies:

- Equality and Diversity Policy
- Disability Policy
- Reasonable Adjustments and Special Considerations Policy.

# Examples of malpractice and maladministration

The categories listed below are examples of malpractice and maladministration. These examples cover malpractice or maladministration that could be carried out by trainers, learners, or assessors. Please note that these examples are not exhaustive.

- Deliberate or persistent failure to adhere to documented procedures, policies, or expectations and/or actions.
- Deliberate failure to adhere to our learner registration and certification procedures.
- Falsifying assessment records.
- Falsifying administration records.
- Submission of false information to gain a qualification.
- Forgery of evidence in the case of assessments.
- Plagiarism of any nature by learners.
- Failure to carry out assessments in accordance with our requirements.
- Intentional withholding of information from Craol which is critical to maintaining the rigor of quality assurance and standards qualifications.
- Deliberate misuse of our logo and trademarks or misrepresentation of a trainer's relationship with Craol and/or its recognition and approval status with Craol.
- Collusion or permitting collusion in assessments.
- A loss, theft of, or a breach of confidentiality in any assessment materials.
- Unauthorised amendment, copying or distributing of assessment materials.
- Deliberate failure to adhere to or deliberately misuse the arrangements outlined in our 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 promptly notify the Craol Project Coordinator in writing. (See contact details above), or via email to qqi@craol.ie.

All cases of suspected malpractice and maladministration are treated confidentially, and Craol will protect the identity of the individual identifying the case. Cases of suspected malpractice brought anonymously will not be processed.

# **Responsibility for the investigation**

- The Academic Committee are responsible for ensuring that a full investigation is carried out promptly to establish whether malpractice or maladministration has occurred.
- Personnel who have a previous or personal involvement in the matter will not be permitted to take part in the investigation.
- The Academic Committee will take any steps necessary to ensure the prevention of the malpractice or maladministration from occurring again.

# Notifying relevant parties

In all cases of suspected or actual malpractice/maladministration the Academic Committee will notify the individuals involved. Where applicable, the Project Coordinator will inform the appropriate regulatory authorities and other awarding organisations, if we believe there has been an incident of malpractice or maladministration, which could invalidate the award of a qualification.

# Investigation timelines and summary process

We aim to resolve all stages of the investigation as promptly as possible on receipt of an allegation.

The investigation may involve a request for further information from relevant parties and/or interviews with personnel involved in the investigation. Therefore, we will:

- Ensure all material collected as part of an investigation is securely kept. All records and documentation concerning a completed investigation that ultimately leads to action being taken will be retained for a period of not less than I year.
- If an investigation leads to invalidation of certificates all records and documentation relating to the case will be retained until the case and any appeals have been heard.
- Expect all parties, who are either directly or indirectly involved in the investigation, to fully co-operate with us.

# **Investigation report**

After an investigation, we will produce a draft report for the parties concerned to check the factual accuracy where required. Any subsequent amendments will be agreed between the parties concerned and ourselves.

The final report will be made available to the parties concerned and to the regulatory authorities and other external agencies as required.

#### **Investigation outcomes**

On conclusion of a malpractice/maladministration investigation, the Craol Training and Quality Assurance Committee will propose a course of action which will be signed off by the Craol Coordination Committee before implementation. Any action proposed will be **proportionate with the gravity** of the malpractice/maladministration as determined by the outcome of the investigation.

Appeals can be submitted in writing.



# **Equality and Diversity Policy**

# 1. Introduction

This policy sets out Craol Community Radio Forum of Ireland Society Ltd 's, hereafter referred to as Craol, commitment to promote equality of opportunity for staff, learners and all interested external parties who are affiliated with the organization. Craol's Equality and Diversity Policy is based on the Equal Status Acts 2000-2018 which prohibit discrimination in the provisions of goods and services, accommodation, and education. The Acts cover the nine grounds of gender, marital status, family status, age, disability, sexual orientation, race, religion, and membership of the Traveller community.

Craol seeks to take all necessary action to ensure that this policy is effective and implemented. Craol seeks to ensure that all those affiliated with the organisation have rights and responsibilities in relation to the promotion of equality.

# 2. Scope

This policy is aimed at learners, staff, and all interested parties of the organization. Craol will not discriminate unfairly, either directly or indirectly, against any learner or employee, whether employed or voluntary.

# 3. Date of issue and review.

This policy was implemented on April 2008 and reviewed on September 2022. It will be reviewed annually in line with Craol's practice of regular self-evaluation arrangements and revised as and when necessary, in response to feedback, best practice and changes in legislation.

# 4. Aims of Craol Equality and Diversity Policy

4.1 Craol's Equality and Diversity Policy is designed in accordance with the organisation's commitment to the AMARC charter and to delivering social benefit to local communities affiliated with the organization including, delivering benefits that will enhance the lives of individuals socially, culturally or economically in terms of development, empowerment, and/or well-being, that otherwise would not have come about and ensuring a sense of confidence and creativity among minority and marginalized communities.

# 4.2 Craol's Equality and Diversity Policy ensures:

Equality of opportunity is delivered through their ongoing support of learners, trainers, staff, and volunteers regardless of gender, marital status, family status, age, disability, sexual orientation, race, ethnicity and religion.

- 4.2.1 Craol modules are audited regularly to ensure access is provided to all targeted learners in line with current Equality legislation.
- 4.2.2 Trainers are briefed and undergo training on Equality and Diversity to ensure that they fully understand the role they play in encouraging learners. This will form part of the trainer's induction training and written details will be included in the Trainer's Handbook.
- 4.2.3 A designated member of Craol has comprehensive training on equality and diversity in Ireland today. This will include training on delivery and planning of equality strategies.
- 4.2.4 That assessments are carried out fairly and based on demonstrable and justifiable criteria and judged against required standards while allowing for any adjustments necessary for individual learners.
- 4.2.5 That training is carried out in buildings which are safe and accessible for learners with special needs. The training environment will be inspected and particular attention given to wheelchair access.



# **Disability Policy**

# 1. Introduction

The Craol Community Radio Forum of Ireland Society Ltd, hereafter referred to as Craol, Disability Policy is designed to ensure that all persons who are affiliated with the organisation and who are considered to have a disability have access to equal and full participation in the organisation. The Policy is designed in accordance with the Disability Act 2005 which places a statutory obligation on public service providers to support access to services and facilities for people with disabilities and entitles people with disabilities to:

- Have their health and educational needs assessed.
- Have individual service statements drawn up, setting out what services they should get.
- Access independent complaints and appeals procedures.
- Access public buildings and public service employment.

# 2. Scope

This policy is directed to all Craol staff, learners and external interested parties. It is designed to ensure that procedures are carried out in line with current legislation and within the organisation's ethos of equality, diversity and inclusion.

#### 3. Date of issue and review

This policy was implemented on April 2008 and reviewed on September 2022. ? It will be reviewed annually in line with Craol's practice of regular self-evaluation arrangements and revised as and when necessary, in response to feedback, best practice and changes in legislation.

# 4. Aims and objectives of Craol Disability Policy

Under the Disability Act 2005 a person is considered to have a disability if he/she/they have a physical or mental impairment which has a substantial and long-term adverse effect on his/her/their ability to carry out normal day to day activities. Craol is committed to eliminating disability discrimination in the workplace and providing inclusion, full participation and independence to learners, staff and volunteers affiliated with the organisation.

- 4.1 According to the National Disability Inclusion Strategy 2017-2021 people with disabilities should have the same rights and opportunities as everyone else in Ireland. Disability discrimination occurs when:
  - For a reason related to their disability, a disabled person is treated less favourably than other people, and this treatment cannot be justified.
  - An employer fails to comply with the duty to make a reasonable adjustment in relation to the disabled person, and the failure cannot be justified.

- 4.2 Learners who are considered to have a disability are entitled to:
  - 4.2.1 Suitable access and egress to and from the training room, canteen/eating area, toilets and other areas within the training environment, e.g., ramps, easily accessible swing doors etc.
  - 4.2.2 Suitable accommodation within the training room, canteen/eating area, toilets and other areas within the training environment. e.g., space for wheelchairs, mobility appliances, disability friendly sinks, doorways etc.
  - 4.2.3 Unbiased information and support regarding any procedures developed that ensures that groups and individuals who might experience inequality are supported. This includes information on and inclusion in planning processes, staff/learner training and disability policies and procedures
  - 4.2.4 Information relating to adjustments in the case of disability. (See Craol Reasonable Adjustments and Special Considerations Policy for more information on this.)
  - 4.2.5 Have access to and protection of any personal or medical information they have provided to the organization. See the Craol Data Protection and Data Retention Policies.) Personal information can be accessed by submitting a request in writing.

# 5. Reasonable Adjustments and Special Considerations

Under Craol's Reasonable Adjustments and Special Considerations Policy the following criteria are considered for adjustments:

- Cognition and Learning Needs
- Communication and Interaction Needs
- Sensory and Physical Needs
- Social, Mental Health and Emotional Needs.
- 5.1 Reasonable adjustments apply to learners who have a permanent or ongoing disability or specific learning needs. Special considerations apply to learners who have a temporary disability, medical condition or learning needs. The above list is not exhaustive and learners are encouraged to apply for any assistance they require that is pertinent to them.

The Craol Disability Policy endeavors to provide fair and equitable opportunities to all persons affiliated with the organization. Information relating to this policy may be accessed by contacting the

Craol Project Coordinator

Craol- The Community Radio Forum of Ireland Society Ltd, C/O Involve CLG, Monksland Business Park, Athlone, Co. Roscommon N37 VX52

or by email to <u>qqi@craol.ie</u>



# **Reasonable Adjustments and Special Considerations Policy**

#### 1. Introduction

The Craol Community Radio Forum of Ireland Society Ltd, hereafter referred to as Craol, Reasonable Adjustments and Special Considerations Policy is informed by The Equality Employment Acts 1998-2015. It sets out the procedures that trainers/assessors should follow when implementing reasonable adjustments and special considerations. It also sets out the criteria for learners who wish to avail of reasonable adjustments and special considerations. This policy gives details of the services provided by Craol for these arrangements.

Craol treats all records of reasonable adjustments and special consideration arrangements in confidence and retains them in accordance with our GDPR obligations as set out in the Data Protection Policy and Data Retention Policy which are available on request by contacting the Craol's Project Coordinator. (see details above)

#### 2 Scope

This policy is designed for trainers and learners affiliated with Craol. Craol administration staff and assessors should also refer to this policy.

This policy is available on request by contacting:

The Project Coordinator Craol- The Community Radio Forum of Ireland Society Ltd. C/O Involve CLG Monksland Business Park Athlone Co. Roscommon N37 VX52

Or by email to: qqi@craol.ie

#### **3 Date of Issue**

This policy was implemented on April 2008 and reviewed on September 2022. It will be reviewed annually and updated as appropriate, in response to feedback from learners and teachers.

#### 4. Reasonable adjustments and special considerations.

Craol is committed to fair and equal assessment processes and promotes equal and fair access to all learners in the assessments we provide. Craol recognises that there will sometimes be a need for learners to have access to accommodations in order to meet their individual needs.

Reasonable adjustments apply to learners who have a permanent or ongoing disability or specific learning needs. Special considerations apply to learners who have a temporary disability, medical condition or learning needs or who are indisposed at the time of the assessment. The provision for reasonable adjustments and special consideration arrangements ensures that learners receive fair recognition of their achievement whilst maintaining the integrity of the assessment.

# 4.1 Reasonable adjustments

A reasonable adjustment is defined as a permanent disability or difficulty that will impact on the learner's assessment/examination process. The aim of a reasonable adjustment is to offset any disadvantage the learner may experience during assessment/examination.

Reasonable adjustments must not affect the integrity of the assessment. They may involve:

- Changing standard assessment arrangements for individual learners, e.g., implementing rest breaks between sections of an assessment. This provides the learner with extra time, without affecting the set time frame for the assessment.
- Adapting assessment materials, larger font.
- Allowing access to support workers during assessment, such as a scribe.
- Re-organising the assessment room, such as removing visual stimuli for an autistic learner.

Reasonable adjustments should be requested and approved by the trainer prior to the assessment. The use of a reasonable adjustment will not be taken into consideration during the assessment of a learner's work. Reasonable Adjustments apply to how the assessment is conducted not the assessment of the work.

Each request for a reasonable adjustment will be considered on a case-by-case basis. What is reasonable in terms of an adjustment to the assessment will depend on the individual circumstances, cost implications and the practicality and effectiveness of the adjustment.

# 4.2 Special considerations

Special considerations differ from reasonable adjustments as they apply to a temporary illness or adverse circumstance that could affect the learner's performance. Trainers will consider applications for special considerations based on the information provided on a case-by-case basis.

# 5. Submitting applications for reasonable adjustment arrangements

Requests for reasonable adjustments must be sent to the trainer at the beginning of the module.

A fully completed form for reasonable adjustment should be completed and given to the trainer at the beginning of the course. Craol reserves the right to refuse an entry from a learner if the adjustment required would affect the integrity of the module.

Each request should include the following information:

- The nature of the learner's disability/learning need.
- The special arrangements requested.

# 7. Special considerations

Special considerations are granted for a temporary illness or indisposition. This can be applied for before or during the module or assessment.

# 7.1 Submitting applications for Special Considerations

A learner may apply for special consideration prior to the assessment, e.g., in the case of an accident, a broken limb for instance.

Trainers and/or learners need to complete the form at the end of this policy and provide sufficient information to Craol regarding the request. Craol will then make a decision about how to process the application.

Examples of special consideration decisions include but are not limited to:

- Deferring the assessment to a later date.
- Allowing an adjustment to the assessment process these could be similar in nature to those granted for reasonable adjustments.



# **Reasonable Adjustment/Special Consideration Form**

Name of Learner	
Name of Trainer	
Name of Parent/Guardian, if applicable.	
Module Title	
Reason for application	
Date of request	
Signature of Learner	
Request granted/denied	
Signature of Trainer	



# **Recruitment Policy**

# 1 Introduction.

In accordance with Craol's commitment to delivering social benefit to local communities, the organization and Craol stations actively seek to promote equitable opportunities for recruitment candidates regardless of nationality, ethnicity, religious persuasion, social background, disability, age, and gender.

# 2 Scope

This policy is directed to all Craol staff including the Board of Directors (CCC), Craol trainers, contracted self-employed staff and external associated parties.

# 3 Date of Issue

This policy was implemented on April 2008 and last reviewed on September 2022. It is subject to annual review and can also be altered in accordance with changes in employment legislation.

# 4 Aims of Policy

Craol is committed to recruiting the best candidate for the position advertised. Criteria for each post is clearly identified within advertising. In accordance with delivering quality assured training Craol's advertising and recruitment ethos includes the following:

# Job descriptions and advertisement process.

- Job descriptions will be drawn up to clearly outline the duties of the position advertised.
- Job descriptions will be pertinent to the position advertised and any other duties that may be required will be clearly defined within the job specification.
- Qualifications, previous experience, and personal attributes will be clearly defined as either necessary or desirable.
- Garda Vetting (if necessary) will be clearly outlined at the advertising stage of the process. This applies specifically to trainers.
- Vacancies can be advertised on Craol website and Craol social media platforms.
- A Craol trainer's application form must be completed as part of the application for trainer positions.
- References will be required.

# **Interview process**

- Interviewees will be introduced to the interview panel and the interview process will be explained prior to the interview commencing.
- All interview questions will be based on the information required in the job advertisement and the information given in CV's/Application forms filled in by interviewees.
- Interview questions will be agreed on prior to the interviewee by the interview panel.
- A scoring sheet will also be used to match interviewees to the position/s advertised and each interviewer will have a copy.
- Interviewees will be informed of when they can expect to hear from the organisation regarding their interview results.
- Interviewees will be informed as to how their identities, qualifications and references will be verified.
- In accordance with Craol's ethos of fairness and equality accommodation will be made for interviewees with disabilities.
- After the interview, the panel will meet and evaluate the interviewee based on the question scoring sheet, the interviewees experience, and qualifications and subject to the uptake of reference.
- Successful and unsuccessful interviewees will be notified in writing. All interviews will be treated with strict confidence.
- Interviewees who have not been successful will have access to their interview results, including the marking scheme if they require them.



# **Data Protection Policy**

# 1 Introduction

This Policy sets out the obligations of Craol Community Radio Forum of Ireland Society Ltd, (hereafter referred to as Craol), in regard to Data Protection. It outlines the responsibilities of Craol in maintaining and ensuring the rights of all staff both employed and voluntary, Craol learners, trainers, assessors, member and associate members and all other interested parties in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation ("GDPR").

GDPR defines "personal data" as any information relating to an identified or identifiable natural person ("a data subject"). An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

#### 2 Scope

This policy applies to all personal data created or received by Craol in all formats. It sets out Craol's obligations regarding collection, processing, transfer, storage and disposal of personal data for all Craol station staff affiliated with Craol, learners and other interested parties. The procedures and principles set out herein must always be followed by the organisation (both employed and voluntary) and by external agents, contractors, or other parties working on behalf of the organisation.

#### 3. Date of Issue

This policy was implemented on 25<sup>th</sup> May 2018 and was last reviewed on September 2022. No part of this Policy shall have a retroactive effect and shall apply only to matters occurring on or after this date. It will be reviewed annually or subject to changes in GDPR.

# 4 Data Protection Principles

As a Data Controller, Craol is responsible for, and must be able to demonstrate compliance with Data Protection Law. This means complying with and demonstrating that the key principles of Data Protection are met according to The 'General Data Protection Regulation' (GDPR). GDPR sets out the following principles with which any party handling personal data must comply. All personal data must be:

- 4.1 Processed lawfully, fairly, and in a transparent manner in relation to the data subject.
- **4.2** Collected for specific, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes. This includes processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.
- **4.3** Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
- 4.4 Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay.
- **4.5** Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which personal data is processed.
- **4.6** Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or Organisational measures.

# The Rights of Data Subjects

GDPR sets out the following rights applicable to data subjects.

- 5.1 The right to be informed. (Section 13.)
- **5.2** The Right of access. (Section 14).
- **5.3** The Right to rectification. (Section 15).
- 5.4 The right to erasure (also known as the 'right to be forgotten'). (Section 16).
- 5.5 The right to restrict processing. (Section 17).
- **5.6** The right to data portability. (Section 18).
- 5.7 The right to object. (Section 19).

# 6 Lawful, Fair, and Transparent Data Processing

- 6.1 Craol seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. Craol follows the GDPR guidelines which state that the processing of personal data is lawful if least one of the following applies:
  - 6.1.1 The data subject has given consent to the processing of their personal data for one or more specific purposes.
  - 6.1.2 The processing is necessary for the performance of a contract to which the data subject is a party.
  - 6.1.3 The processing is necessary for compliance with a legal obligation to which the data controller is subject.
  - 6.1.4 The processing is necessary for the purposes of the legitimate interests pursued by the data controller or a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child or vulnerable adult.
  - 6.1.5 The processing is necessary for archiving purposes and in the public interest, scientific or historical research purposes, or statistical purposes in accordance with Article 89 (1) of the GDPR.
- 6.2 For the processing of 'special category information' (sensitive personal data) for example, data concerning the data subject's race, ethnicity, politics, religion, genetics, biometrics (if used for ID purposes), health or sexual orientation GDPR guidelines which state that at least one of the following conditions must be met:
  - 6.2.1 The data subject has given explicit consent to the processing of that personal data for one or more specified purposes.
  - 6.2.2 Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law.
  - 6.2.3 Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.
  - 6.2.4 The processing is necessary for the conduct of legal claims or whenever courts are acting in their judicial capacity.

# 7 Specified, Explicit, and Legitimate Purposes

7.1 Craol collects and processes the personal data collected directly from data subjects and personal data obtained from third parties.

- 7.2 Craol will only collect and process personal data for and to the extent necessary for the specific purpose or purposes of which data subjects have been informed.
- 7.3 Data subjects are always kept informed of the purpose or purposes for which Craol uses their personal data.

# 7. Accuracy of Data and Keeping Data Up to Date

**8.1** Craol will ensure that all personal data collected, processed, and held is kept accurate and up to date. This includes, but is not limited to, the rectification of personal data at the request of a data subject, as set out in Section 15 of this policy.

# 8. Data Retention

- **9.1** Craol will not keep personal data for any longer than is necessary for the purpose/s for which that personal data was originally collected, held, and processed. When personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.
- **9.3** For full details of Craol's approach to data retention, including retention periods for specific personal data types held by the organisation, please refer to the Craol Data Retention Policy.

# **10. Secure Processing**

Craol ensures that all personal data collected, held, and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

# 11. Accountability and Record-Keeping

**11.1** The organisation's Project Coordinator is responsible for overseeing the implementation of this Policy, monitoring compliance with this Policy and any other Craol Data Protection-related policies, and with keeping up to date with GDPR and other applicable data protection legislation.

# 13. Keeping Data Subjects Informed

- **13.1** Where personal data is collected directly from data subjects, those data subjects will be informed of its purpose at the time of collection.
- **13.2** Where personal data is obtained from a third party, the relevant data subjects will be informed of the purpose of its collection, and how Craol processes this information.
- **13.3** Details of the data subject's rights in relation to third party information are set out in the Craol Privacy Policy.

# 14. Data Subject Access

- 14.1 Data subjects may make subject access requests ("SARs") at any time to find out more about the personal data which the organisation holds about them, what it is doing with that personal data, and why. This can be done by writing to Craol and marking the correspondence **Subject Access Request**.
- **14.2** Responses to SARs will be made within one month of receipt, however this may be extended by up to two months if the SAR is complex and/or numerous requests are made. If such additional time is required, the data subject shall be informed.
- **14.3** Craol will not charge a fee for the handling of SARs but reserves the right to charge reasonable fees for additional copies of information that have already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

# **15. Rectification of Personal Data**

- **15.1** Data subjects have the right to require the organisation to rectify any of their personal data that is inaccurate or incomplete. The organisation will undertake to rectify the personal data in question, and inform the data subject of that rectification, within one month of the data subject informing Craol of the issue. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.
- **15.2** In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification that must be made to that personal data.

#### 16. Erasure of Personal Data

- **16.1** Data subjects have the right to request that Craol erases the personal data it holds about them in the following circumstances:
  - 16.1.1 It is no longer necessary for the organisation to hold that personal data with respect to the purpose(s) for which it was originally collected or processed.

16.1.2 The data subject wishes to withdraw their consent to the organisation holding and processing their personal data.

16.1.3 The data subject objects to Craol holding and processing their personal data (and there is no overriding legitimate interest to allow the organisation to continue doing so).

16.1.4 The personal data has been processed unlawfully.

16.1.5 The personal data needs to be erased in order for Craol to comply with a legal obligation.

#### 17. Restriction of Personal Data Processing

- 17.1 Data subjects may request that Craol ceases processing the personal data it holds about them. If a data subject makes such a request, the organisation shall retain only the amount of personal data concerning that data subject (if any) that is necessary to ensure that the personal data in question is not processed further.
- **17.2** In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

#### 18. Objections to Personal Data Processing

- **18.1** Data subjects have the right to object to Craol processing their personal data based on legitimate interests or direct marketing (including profiling).
- **18.2** Where a data subject objects to Craol processing their personal data based on its legitimate interests, the organisation shall cease such processing immediately, unless it can be demonstrated there are legitimate grounds for such processing which override the data subject's interests, rights, and freedoms, or that the processing is necessary for the conduct of legal claims.

#### 19. Data Security - Transferring Personal Data and Communications

Craol commits to ensuring the following measures are taken with respect to all communications and other transfers involving personal data:

- **19.1** All emails containing personal data must be marked "confidential".
- **19.2** Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances.

# 20. Data Security - Storage

Craol commits to ensuring the following measures are taken with respect to the storage of personal data:

- **20.1** All electronic copies of personal data should be stored on encrypted drives and devices securely using passwords and data encryption where appropriate.
- **20.2** All hard copies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet, or similar.
- **20.3** No personal data should be transferred to any device personally belonging to an employee/volunteer and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of Craol where the party in question has agreed to comply fully with the letter and spirit of this Data Protection Policy and of GDPR regulations (which may include demonstrating to the Company that all suitable technical and organisational measures have been taken).

# 21. Data Security - Disposal

When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. For further information on the deletion and disposal of personal data, please refer to Craol's Data Retention Policy.

# 22. Data Security - Use of Personal Data

Craol commits to ensuring the following measures are taken with respect to the use of personal data:

- **22.1** No personal data may be shared with an employee/volunteer, external sub-contractor, or other party working on behalf of Craol without consent.
- **22.2** Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised person including but not limited to learners, trainers, internal/external assessors, employees/volunteers, external sub-contractors, whether paid or voluntary, or any other parties at any time.

# 23. Data Security - IT Security

Craol will ensure that the following measures are taken with respect to I.T. and information security:

- **23.1** All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols. All software used Craol is designed to require such passwords.
- **23.2** Under no circumstances should any passwords be written down or shared between any staff of Craol, whether paid or voluntary, external assessors, trainers, learners, or any other parties working on behalf of the organisation, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method.
- **23.3** All software (including, but not limited to, applications and operating systems) shall be kept up to date.

# 24. Organisational Measures

Craol commits to ensuring the following measures are taken with respect to collection, holding and processing of personal data. All Craol employees, whether paid or voluntary, sub-contractors and external parties working on behalf of Craol handling personal data will be:

• Appropriately trained and bound to do so in accordance with the principles of the GDPR and this Policy.

- Be made fully aware of both their individual responsibilities and the organisation's responsibilities under GDPR and under this Data Protection Policy and shall be provided with a copy of this Policy.
- Only have access to personal data if they need to do so in order to carry out their assigned duties correctly.
- Be required and encouraged to exercise care, caution, and discretion when discussing work related matters that relate to personal data, whether in the workplace or otherwise.
- 24.1 All personal data held by Craol will be reviewed periodically as set out in the organisation's Data Retention Policy and methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed.
- 24.2 Where any external contractor or other party working on behalf of Craol handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless Craol against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

#### 25. Data Breach Notification

- **25.1** All personal data breaches must be reported immediately to the Craol's Data Protection contact person as soon as possible.
- **25.2** If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection contact person must ensure that the Data Protection Commission is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.
- **25.3** Data breach notifications shall include the following information:
  - 26.4.1 The categories and approximate number of data subjects concerned.
  - 26.4.2 The categories and approximate number of personal data records concerned.
  - 26.4.3 The name and contact details of Craol's Data Protection contact person (or other contact point where more information can be obtained).
  - 26.4.4 The likely consequences of the breach.
  - 26.4.5 Details of the measures taken, or proposed to be taken, by the organisation to address the breach including, where appropriate, measures to mitigate its possible adverse effects.



# **Data Retention Policy**

# Introduction

As an organisation Craol Community Radio Forum of Ireland Society Ltd, hereafter referred to as Craol, requests, generates, processes, and stores a range of personal data in the conduct of its business. The basis for this is set out in the Craol Data Protection and Privacy Statement. This Data Retention Policy serves as an operational appendix to the Privacy Statement. It describes the types of data stored and the length of time for which they will be retained. Where stored data items have reached the end of their retention period they will need to be eliminated or anonymized for the purposes of research or archival value.

#### Scope

In the interests of transparency this policy is directed to all staff, learners, and other interested parties who have volunteered or have access to information held by the organization.

# Purpose

The purpose of this policy is to alert staff, learners, and other interested parties to the types of information held by the organization, the purposes of holding information, the length of time information is stored for and the manner in which it is held, anonymized or eliminated.

# Date of Issue

This policy was implemented on May 2018 and was reviewed in September 2020. It will be reviewed annually and updated subject in changes in GDPR regulations.

The categories below identify the areas of Craol's operations. Information collated and stored applies to minutes of meetings, post, email, online forms, and social media sites.

- Learner Queries/Admissions
- Learner/Trainer/Contractors
- Assessments//Awards
- Finance, Human Resources
- Sensitive information
- Governance and Management

#### Learner Queries /Admissions

Data type	Retention Policy	Elimination Process
Queries of interest in modules	3 months.	Information is deleted at station
		level.
Name and contact details of querist.		
Applicants who have not followed up or	3 months after	Information is deleted at station
have not been awarded a place.	application.	level.
Name, contact details.		
Learners who have registered and	6 months after	Information is Anonymised for
commenced a module.	certification or leaving	evaluation and monitoring
	the module.	purposes. Identifying details are
		deleted or electronically

Name contact details, date of birth,		removed from the Craol data
gender, PPS Number, requests for		base and at station level.
reasonable adjustment data (where		
applicable, educational, and work		
history data, in the case of an application		
for recognition of prior learning.		
Records of course fees, invoices, receipts	7 years as per financial	Information is Anonymised for
of payments received, (if applicable).	legislation.	secure archiving. Identifying
		details are confidentially
		shredded/or electronically
		removed from the Craol data
		base.

# Learner/Trainer/Contractors

Data Type	Data Retention	Elimination Process
<i>Trainers.</i> Name of trainer/s, contact details (postal and email address, telephone number), qualifications, references, previous employment, Garda Vetting report	3 years after leaving Craol (or the Craol station)	Information is Anonymised for secure archiving. Identifying details are confidentially shredded/or electronically removed from the Craol.
<i>External contractors.</i> Name and contact details, qualifications, previous employment and references, financial details.	3 years after completing work.	Information is Anonymised for secure archiving. Identifying details are confidentially shredded/or electronically removed from the Craol data base.
<i>Learners.</i> Name, contact details, date of birth, PPS Number, gender, reasonable adjustment data (where applicable), details of module, attendance records including records of remote learning, project work, assessment marks and awards.	6 months after certification.	Information is Anonymised for secure archiving. Identifying details are confidentially shredded/or electronically removed from the Craol data base and at station level.

# Assessments/Awards

Data Type	<b>Retention Policy</b>	Elimination Process
Craol Authenticator.	3 years after ceasing to	Anonymised for secure
	work for Craol	archival purposes.
Names, contact details.		Identifying details
		eliminated through
		confidential shredding/or
		electronic means.
Learners		Anonymised for secure

Data on QQI Certificates issued.	3 months after receipt of certificate	archival purposes. Identifying details eliminated through
		confidential shredding/or electronic means.
Appeals requests/decisions	6 months after certification.	Anonymised for secure archival purpose. Identifying details eliminated through confidential shredding/or electronic means.

#### **Financial, Human Resources**

Data Type	Data Retention	Elimination Process
Authenticator.	7 years as per financial regulations.	Permanently removed.
Bank account details, invoices, receipts.		
Room rental payments for course/programmes ran or other purposes.	7 years as per financial regulations.	Permanently removed.
Financial details of contractors.	7 years as per financial regulations.	Permanently removed
Bank account details, invoices, fees paid etc.		
Craol Stations	7 years as per financial regulations.	Permanently deleted.
Station Bank details.		
Contact details of manager, board members, staff, and key volunteers.		
Suppliers Bank account details, contact details.	7 years as per financial regulations.	Permanently deleted
Customers/Grant Agencies	7 years as per financial regulations.	Permanently deleted
Contact details of customers and granters.		

# **Sensitive Information**

Data Type	Data Retention	Elimination Process
Learners, Trainers, Craol	Immediately after	Anonymised for secure
Members, contractors	certification for learners.	archival purpose. Identifying
	Immediately on leaving	details eliminated through
Sensitive information:	Craol for trainers, Craol	confidential shredding/or
including ethnic identity,	members and contractors.	electronic means.
sexual orientation,		
disabilities, health issues,		
marital status.		

# Governance and Management

Data Type	Retention	Elimination Process
Craol Coordination	3 years after ceasing to be	Anonymised for secure
Committee.	affiliated with Craol	archival purposes.
		Identifying details
Names, contact details,		eliminated through
gender, positions held,		confidential shredding/or
length of time of position,		electronic means.
previous		
positions/experience.		
CCC and sub-committee	3 years after specific	Anonymised for secure
meeting minutes.	meetings.	archival purposes.
		Identifying details
		eliminated through
		confidential shredding/or
		electronic means.



# **Anti-Bullying Policy**

#### 1. Introduction

Craol Community Radio Forum of Ireland Society Ltd, hereafter referred to as Craol takes the issue of bullying seriously and are committed to eliminating bullying in the workplace and the training environment. Bullying is unacceptable and all forms of bullying will be dealt with promptly and effectively.

#### 2. Scope

This policy is directed to staff, learners, board members and all affiliated external parties of Craol. It deals with the issue of bullying in the workplace and the training environment.

#### 3. Date of Issue

This policy was implemented on December 2020 and was last reviewed on September 2022. This policy is subject to annual review, or in accordance with changes in the law regarding bullying in the workplace, feedback regarding bullying investigations, or other developments within the organisation.

#### 4. Definitions of bullying.

Bullying is defined as the 'repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work and/or in the course of employment, which could be reasonably regarded as undermining the individual's right to dignity at work'. (See 'Code of Practice for Employers and Employees on the Prevention and Resolution of Bullying at Work, 2020, page 6).

# 4.1 Issues of bullying can include but are not limited to:

- Social exclusion and isolation
- Verbal abuse and insults
- Being treated less favourably than colleagues in similar roles
- Belittling a person's opinion
- Spreading malicious rumours, gossip or innuendo
- Intrusion pestering, spying or stalking
- Intimidation and aggressive interactions
- Excessive monitoring of work
- Withholding information needed for the person to do their job properly
- Repeatedly manipulating a person's job contents and targets
- Blaming a person for things beyond their control.
- Sexual intimidation or harassment.
- Cyber bullying.
- Bullying as a result of sexual orientation, family status, marital status, religion, race, disability, membership of the traveller community, age or gender.

An isolated incidence of any of the above is not considered to be bullying

4.2 Bullying should be reported immediately to the class representative, trainer or by using the complaints form which is available at back of the Learner's Handbook.

# 5. Aims and Objectives of Craol's Anti-Bullying Policy

- 5.1 Craol is committed to ensuring that the workplace and training environment are free from bullying and that all staff and learners are provided with an atmosphere of respect, collaboration, openness, safety and equality. All Craol staff and learners have the right to be treated with dignity and respect at work. Craol stations are responsible for implementing this Anti-Bullying Policy.
- 5.2 Staff training regarding bullying and anti-bullying procedures will be delivered on a regular basis. All new staff and learners are informed about the Anti-Bullying policy and procedures at their initial inductions.
- 5.3 Staff and learners are encouraged to take responsibility for contributing to the maintenance of a working/training environment that is free from bullying.
- 5.4 Craol commits to taking seriously any complaints regarding bullying and to treat all parties with sensitivity, fairness, respect and confidentiality.
- 5.5 Bullying by external parties contracted by Craol is not acceptable and complaints will be treated seriously and follow Craol policies and procedures.
- 5.6 Craol commits to recording and monitoring complaints regarding bullying, with the purpose of identifying and eliminating bullying behaviour. All information is collected in accordance with Craol's Data Protection and Data Retention Policies.
- 5.7 Disciplinary sanctions will be applied depending on the severity of the bullying and the ensuing investigation.
- 5.8 Physical abuse, assault, sexual harassment is illegal and complainants may decide to refer these incidents to the legal authorities.
- 5.9 False allegations of bullying will result in disciplinary sanctions.
- 5.10 If a learner feels that they are being bullied due to their sexual orientation, family status, marital status, religion, race, disability, membership of the traveller community, age or gender they should also contact the Irish Human Rights and Equality Commission. Harassment under all of the above grounds is against the law and the Irish Human Rights and Equality Commission (<u>IHREC</u>) is the State Agency that monitors that area.

# 6. Employers Responsibility

6.1 |It is the employer's, (Craol's or the Craol station involved) duty to 'prevent any improper conduct or behaviour likely to put the safety, health and welfare of employees at risk' (Safety, Health and Welfare Work Act, Section 8). This includes bullying.

- 6.2 It is the responsibility of Craol or the Craol station involved to ensure that inappropriate behaviour towards learners is identified and eliminated in the workplace and the training room and to:
  - Take all reasonable steps possible to prevent any such behaviour taking place.
  - Have an anti-bullying/Safety Statement/Code of Conduct developed with the inclusion of staff and learners.

# 7. Learners Responsibilities

- 7.1 During their time with Craol learners are expected to:
  - Behave in an appropriate manner, in a way that does not endanger the health, safety and welfare of yourself or the other employees/learners. (See Code of Conduct in Learners and Trainers Handbooks.)
  - Comply with relevant policies and procedures.
  - Co-operate with the station manager when a reported concern is being investigated.

# 8. Procedure for making a complaint. Learner

Craol is aware that the person reporting a concern may find the process difficult and may feel intimidated. It is important that staff are aware of the necessary procedures and make the process as smooth as possible for the complainant.

- 8.1 Learners can direct their complaints to their class representative or go directly to the trainer.
- 8.2 All learner complaints will be referred to the station manager, taken seriously and investigated impartially.
- 8.3 Trainers will do their upmost to ensure that a learner who makes a complaint is not victimised for doing so.
- 8.4 Depending on the nature of the alleged concern the organisation may decide, with the consent of the complainant, to involve external authorities.
- 8.5 After discussing the issue the complainant should make a complaint in writing and send it the Station Manager.
- 8.6 Providing as much information as possible will ensure a thorough and fair investigation is carried out.
- 8.7 Recurring incidents of bullying, harassment or abuse will be noted by station staff and trainers will continue to check in with learners after the issue is settled to ensure there is no recurrence of the issue.
- 8.8 The person/s accused of the alleged bullying will be approached by the Station Manager and given an opportunity to respond to the allegation.
- 8.9 Learners who make an unsubstantiated complaint are at risk of being asked to leave the module.

# Learners should include the following information:

- Name of learner.
- Name of trainer.
- Name of advocate (if applicable)
- Nature of the complaint.

# 9. Procedure for making a complaint. Contracted staff and other affiliated parties.

It is important that contracted staff and affiliated parties are also protected by Craol's Anti-Bullying Policy. Staff of Craol stations can refer to the stations anti-bullying policy. Complaints can be addressed to the station manager.

Contracted staff and affiliated parties can refer alleged bullying incidences to the Chairperson of Craol.

#### 10. Policy implementation

Craol has developed a Code of Practice that, when followed ensures a safe, harmonious, and inclusive work and training environment. Learner and Trainer feedback forms, access to a class representative and trainer, and relevant forms allow learners and staff to access support when needed. This also provides the organization with the relevant records needed in order to monitor and evaluate complaints. A copy of the Code of Conduct and Learner's Complaint Form are available in the Learners Handbook.



# **Quality Assurance Policy**

# 1 Introduction

Craol Community Radio Forum of Ireland Society Ltd, hereafter referred to as Craol, is committed to providing a clearly documented culture of quality assurance within every aspect of the organisation, including but not limited to academic and corporate governance, programme/module development and approval, module evaluation, learner and trainer support, trainer recruitment, equality and diversity, data protection and health and safety. Craol's QA Policy is available through the organisation's website or on request from the Project Coordinator.

Craol provides quality assured training that meets the statutory requirements of the Qualifications and Quality Assurance (Education and Training Act) 2012 to 2019 and the core guidelines published by Quality and Qualifications Ireland (QQI).

# 2 Scope

Craol's Quality Assurance Policy applies to all Craol staff, Board of Directors (CCC), Craol Station Boards and staff and volunteers, trainers, learners and external associated parties.

#### 3 Purpose

The purpose of this policy is to provide a framework which supports the Quality Assurance System (QAS) developed by the organisation. It is designed to complement the organisations Quality Assurance Manual which contains the policies, procedures and information that underpins the organisations commitment to providing a quality assured working and learning environment for all Craol staff, trainers, learners, and associated stakeholders.

#### 4 Date of Issue and Review

This policy was implemented on April 2008 and reviewed on September 2022. It will be reviewed annually. It is also monitored and reviewed and open to adaptation and improvement as required.

# 4. Aims and objectives of Policy

The Craol QQI Training Team hold responsibility for monitoring the organisations QAS, supported by the Craol Coordination Committee. However, all members of Craol are responsible for being aware of QA, self-evaluation of their individual roles and maintaining a high standard of quality assurance throughout the organisation.

In order to ensure Craol's ongoing commitment to continuous quality assurance and quality improvement the organisation aims to deliver a robust Quality Assurance System that:

- 1. Maintains the organisations commitment to Social Benefit as an integral part of its Quality Assurance development and maintenance.
- 2. Implements a robust Risk Management Policy in order to monitor and maintain a high standard of Quality Assurance.
- 3. Includes the development of a Learner Handbook that clearly outlines roles, responsibilities and code of conduct, information on QQI, training pathways, information regarding module criteria, module outcomes, assessment procedures, certification, access and transfer pathways (if applicable), learner feedback and support structures.

- 4. Includes the development of a Trainer Handbook that clearly outlines roles, responsibilities and code of conduct, information on QQI, training pathways for learners, training manuals for individual modules, regular self-evaluation and monitoring through trainer feedback and access to Continuing Professional Development. (CPD)
- 5. Ensures that staff, learners, trainers, volunteers and associated external personnel are made aware of Craol's Quality Assurance System, Quality Assurance Policy and Craol Policies and Procedures, through the trainer and learner handbooks and orally on entry to the organisation or to a module.
- 6. Ensures that Corporate and Academic board members roles and responsibilities are clearly outlined and all statutory and legal obligations are met. Corporate and academic decision making are kept separate and any conflicts of interest between academic development and corporate approval are transparent and dealt with according to the governance handbook. (Governance Handbook, Page 25)
- 7. Ensures that all financial and corporate decisions are carried out ethically, legally and with accountability in line with financial and legal requirements. (Governance Handbook, Page 10)
- 8. Ensure that budgets are in place for all administration relating to Quality Assurance including but not limited to QQI related work, external examiners, QA manual creation and CPD of trainers.
- 9. Ensures that adequate resources are available for the continuation of training in line with the organisation's ethos and objectives.
- 10. Ensures that provider trends are captured through learner and trainer feedback forms, module delivery evaluations, numbers of submissions for validations, number of awards received, learner satisfaction, complaints, and appeals processed.
- 11. Ensures that any gaps identified through feedback or self-evaluation, in any area of the organisation, are clearly documented along with any actions adopted to improve the running of the organisation.
- 12. Provides clear and transparent information on the roles and responsibilities of Craol staff, volunteers, members of the Craol Coordination Committee, Academic Committee, contracted staff, sub-committees and external associated staff.
- 13. Ensures the Craol Academic Committee is made up of suitably qualified and experienced persons whose role is to oversee all aspects pertaining to academic quality assurance.
- 14. Ensures that regular self-evaluation and monitoring practices are carried out, through learner and trainers' feedback, CPD and ongoing training for Board members.
- 15. Provides qualified and competent trainers who are committed to the ethos, mission and core values of the organisation.
- 16. Ensures that data collected is used for the purposes of monitoring and evaluation of current structures within the organisation and for the ongoing improvement of services and training.
- 17. Ensures that all policies and procedures are monitored, kept up to date and altered in accordance with changes in the organisation or legislation.
- 18. Maintains all records in accordance with GDPR guidelines and makes them available for internal and external review by the awarding body, QQI.

# Craol's Quality Assurance Policy is also informed by:

- The Qualifications and Quality Assurance (Education and Training Act) 2012 to 2019
- The core guidelines published by Quality and Qualifications Ireland (QQI).
- The Broadcasting Authority of Ireland (BAI)
- The BAI Community Media Policy
- The AMARC charter
- The Ethos of Community Radio
- The Social Benefits Framework



# Safety, Health and Welfare Policy

#### Section 1.0 Foreword

This document is the Community Radio Forum of Ireland Society Ltd, hereafter referred to as Craol, programme in writing for safeguarding Safety, Health and Welfare in the workplace. It represents Craol's commitment to Safety, Health and Welfare and specifies reviewing safety, health and welfare standards. This Statement has been prepared in compliance with the Safety, Health and Welfare at Work Act, 2005.

It is emphasised that responsibility for Safety, Health and Welfare at workflows from the Craol Coordination Committee (employer) through to each level of volunteer, contractors, and staff (employee) who also bear responsibility for their own Safety, Health and Welfare at Work.

This Safety Statement will be periodically reviewed in accordance with the requirement of the 2005 Safety, Health and Welfare at Work Act, and whenever required by changes in the organisation, personnel, operating procedures or legislation.

#### Section 2.0 Scope

This Safety Policy has been prepared specifically for Craol and is based on the following:

- An identification of the hazards present in the workplace.
- An assessment of the risks arising from these hazards and in particular hazards which put any employee at unusual risk.
- The specification of the manner in which safety, health and welfare are to be secured by deciding on any control measures and if necessary, the protective equipment to be used in situations where no control measures are feasible.
- Details of the arrangements made and resources provided for securing safety, health and welfare.
- Details of the co-operation required from employees in safety and health matters.
- The names and job titles of persons responsible for safety and health in the workplace.
- The arrangements made for consultation with employees on safety and health matters.
- Details of health and safety information available to employees.
- Details of health and safety training available to employees.

#### Section 3.0 Statement of Safety Policy

The Safety Policy of Community Radio Forum of Ireland, Co-operative Society Limited 5352R (Craol) is:

That standards of Safety, Health and Welfare must be maintained at the highest level.

The statutory obligations are the minimum standard for which all employees of the organisation are responsible and the aim must be to attain higher standards.

Craol will identify hazards, assess the risks and implement control measures to minimise any such risks.

Craol will purchase equipment in accordance with the required standards and codes of practice and ensure that all existing equipment conforms to all current standards and codes of practice.

Craol will ensure that employees at all levels will receive sufficient training in the safety, health and welfare aspects of their work.

Craol will establish a mechanism for consultation with employees on matters of health and safety.

It is legal requirement of the 2005 Safety, Health and Welfare at Work Act that all employees co-operate together and with their employer to prevent injury to themselves or others. It is only with the active co-operation of all that good health and safety practices can be maintained.

Craol will obtain, where necessary, the services of a competent person for the purpose of ensuring, so far as is reasonably practicable, the safety, health and welfare at work of all employees.

This policy will be implemented through co-operation between Craol Coordination Committee, volunteers and contractors.

Signed:\_\_\_\_\_ Secretary Date:\_\_\_\_\_

# Section 4.0 Safety Organisation

# 4.1.1 Coordination Committee

- Be fully familiar with the organisation Safety Statement.
- Ensure that the Safety Statement is communicated and implemented.
- Ensure that all employees, visitors, are made aware of and fully adhere to the safety and health policy.
- Ensure all tasks being carried out are completed safely and without risk to health.
- Continue to develop safety practices to ensure so far as is reasonably practicable, the safety of all employees.
- Maintain safe working conditions and practices by being alert to and immediately correcting unsafe conditions.
- Ensure only trained personnel are authorised to operate machines and equipment.
- Ensure all employees have received the appropriate occupational safety and health training.
- Ensure that all accidents, dangerous occurrences and near misses are reported and investigated in a timely manner and corrective actions put in place to prevent recurrence.
- Maintain good housekeeping standards.
- Conduct regular safety audits.
- Be aware of responsibilities under the organisation emergency response plan.
- Consider all representations from employees concerning Safety and Health.

# 4.1.2 Employees

- Comply with organisation safety policies and procedures.
- Take all precautions necessary to safeguard their own Safety and Health and that of their fellow colleagues.
- Take a leading role in promoting Health and Safety in the organisation.
- Be aware of the possible hazards.
- Take care when carrying out their duties to ensure their own safety and that of their fellow colleagues.
- Report all injuries to the Safety Officer.
- Know the location of the first aid kit.
- Be aware of the emergency evacuation plan.

#### 4.1.3 Visitors

Persons other than employees while in the organisation are bound by the following rules:

- They are obliged to observe the Safety Rules and any instructions given by personnel who enforce the safety policy.
- They are obliged to adhere to the emergency evacuation procedures.

# Section 5.0 General Duties

# 5.1 Duties of the Employer

The Safety Health and Welfare at Work Act 2005 sets out the general duties of the employer to ensure so far as is reasonably practicable, the safety, health and welfare at work of all employees.

The Act requires Employers, in so far as is reasonably practicable to provide:

- 1. A place of work that is safe and without risk to health.
- 2. Safe means of access and egress to and from it.
- 3. Provide and maintain safe plant and equipment.
- 4. Provide safe systems of work.
- 5. Provide the necessary training required to safeguard the safety and health of employees.
- 6. Provide suitable protective clothing if required.
- 7. Prevent any risk to health at work in connection with the use of any article or substance.
- 8. Provide and maintain facilities for the welfare of employees at work.
- 9. Obtain where necessary the services of a competent person for the purpose of ensuring, so far as is reasonably practicable the safety and health at work of his employees.

The Act states that a person who is undergoing training for employment or is undergoing work experience shall be deemed to be an employee. The act places a duty on employers to safeguard the safety and health of persons who are not their employees but may be affected by their operations.

# 5.2 **Duties of the Employee**

The Act places duties on employees in order to safeguard their own safety and health at work. Employees are expected to:

- 1. To take reasonable care for their own safety, health and welfare and that of any other person that may be affected by their acts or omissions.
- 2. To co-operate with his employer to enable compliance with any of the relevant statutory provisions.
- 3. To use for the purpose of safeguarding safety and health any protective clothing or equipment provided by the employer.
- 4. To report to the employer any defective equipment, place of work or system of work that might endanger safety, health and welfare.
- 5. No person shall intentionally or recklessly interfere with or misuse any appliance, protective clothing, convenience or other items provided for securing safety, health and welfare at work.

# Section 6.0 Consultation Arrangements

# 6.1 Safety Consultation

The Safety, Health and Welfare at Work Act, 2005 places a duty on employers to consult with their employees.

The Act states that:

It shall be the duty of every employer

- (a) to consult *his* employees for the purpose of the making and maintenance of arrangements which will enable *him* and *his* employees to co-operate effectively in promoting and developing measures to ensure their safety, health and welfare at work and in ascertaining the effectiveness of such measures.
- (b) as far as is reasonably practicable, to take account of any representations made by employees.

The Act states that:

# *"Employees shall have the right to make representations to and consult their employer on matters of safety, health and welfare in their place of work."*

This representation may be made through the Safety Representative, or on and individual basis directly to Coordination Committee.

Matters relating to safety should always be discussed initially with the Coordination Committee. Items may be referred to the Safety Representative or when, in the opinion of the employee, the initial response of Coordination Committee is felt to be unsatisfactory, or when corrective action agreed by Coordination Committee is not implemented within a reasonable time.

## 6.2 Safety Representative

The Act states that:

"Employees may, from time to time, select and appoint from amongst their members at their place of work a representative (in this Act referred to as the "safety representative") to represent them in consultations with their employer".

Employees may if they so wish elect a Safety Representative to represent them in consultation with Coordination Committee on matters of Health and Safety.

#### 6.2.1 Duties of the Safety Representative

The act outlines that the Safety Representative may:

- (a) Make representations to an employer on any aspect of safety, health and welfare in the workplace.
- (b) Investigate accidents and dangerous occurrences provided that they shall not interfere with or obstruct the performance of any statutory obligation required to be performed by any person under any of the relevant statutory provisions.
- (c) Make oral or written representations to inspectors on matters of safety, health and welfare at work.
- (d) Receive advice and information from inspectors on matters of safety, health and welfare at work.
- (e) Subject to prior notice to the employer and to agreement between the safety representative and the employer as to frequency, carry out inspections and in reaching such agreement, which shall not be unreasonably withheld by the employer, the parties shall consider the nature and extent of the hazards in the place of work in determining the frequency of inspections to be carried out by the safety representative at the place of work concerned.
- (f) Subject to prior notice to the employer, in circumstances in which it is reasonable to assume that risk of personal injury exists, to investigate potential hazards and complaints made by any employee whom he represents relating to that employee's safety, health and welfare at the place of work; and
- (g) on a request being made, accompany an inspector on any tour of inspection other than a tour of inspection made by the inspector for the purpose of investigating an accident.

#### 6.3 Disciplinary Procedure

Disciplinary Action, up to and including dismissal, will be taken against Employees where compliance with Safety and Health rules/regulations cannot be achieved through advice and persuasion. Disciplinary Procedures will be in line with what is already in place and detailed in Employees contracts of employment.

#### Section 7.0 Health and Safety Resources

Craol is committed to provide at all times the resources necessary to ensure as far as is reasonably practicable the Safety, Health and Welfare of employees. In order to secure the Safety, Health and Welfare of employees Craol has allocated the following resources:

- Cleaning materials for Covid-19
- First Aid kit
- Fire extinguisher

#### 7.1 Safety Representative

A Safety Representative may be elected by employees

- Encourage safety awareness
- Provide a forum for discussion of Safety and Health matters.
- Identify ways in which safety can be improved.
- Make recommendations to Coordination Committee from discussions on safety matters.

#### 7.2 Safety Consultant

Craol has engaged the services of Niall Byrne Safety Consultant who has carried out a detailed Hazard Identification and Risk Assessment. The consultant has advised on the seriousness of the risks and recommended controls to eliminate or reduce the seriousness of the hazards.

#### 7.3 Safety Review

Craol and the Safety Consultant will meet at intervals (to be determined) to review:

- Progress on the implementation of the Safety Statement and The Emergency Plan Safety issues.
- Notifiable accidents and dangerous occurrences.
- Legislative compliance.

#### 7.4 Medical and Welfare Facilities

Craol will provide the necessary medical and welfare facilities required for the safeguarding of Safety, Health and Welfare at work.

#### 7.5 First Aid

- At least one person will be trained in First Aid.
- The necessary First Aid Supplies will be provided.

#### 7.6 Fire Safety

- The fire evacuation plan is implemented in accordance with Involve, Monksland Business Park, Athlone.
- A Fire Warden has been appointed by Involve, Monksland Business Park, Athlone.
- Fire Drills will be held at least twice annually.

## Section 8.0 Hazard Identification and Controls

The Safety, Health and Welfare at Work Act 2005 specifies that:

"The Safety Statement shall be based on an identification of the hazards and an assessment of the risks to safety and health at the place of work to which the safety statement relates".

## 8.1 Electricity

#### Hazards

Risk of serious injury or death from electrocution from faulty plugs, sockets, adapters, leads, wiring portable electrical equipment, heaters etc.

#### Controls

- Ensure all plugs and sockets are in good repair, replace damaged plugs and sockets immediately.
- Avoid the use of adapters or extension leads.
- Ensure circuits are protected by Residual Current Devices.
- Take care that the trailing leads of heaters and other appliances are not trip hazards.
- Ensure there is clear access to switch boards and similar installations in case isolation is required in an emergency.
- Assume all electrical circuits are live.
- Ensure all portable equipment is inspected periodically and is in good working order.

## Do not attempt any electrical repair:

Repairs should only be carried out by a qualified RECI contractor. Do not plug in or unplug appliances with wet hands. Ensure all electrical panels are kept locked.

#### 8.2 Fire

## Hazard

Risk of serious injury from: Flames, smoke, or fumes - Burns, asphyxiation.

## Controls

- All staff will receive fire evacuation training.
- A Fire Marshal and fire warden will be appointed.
- Enforce good housekeeping practices.
- Maintain proper segregation and storage of all flammable/combustible materials.
- No smoking policy except in designated areas.
- All ignition sources will be properly controlled.
- All electrical equipment will be properly maintained.
- All electrical work to be carried out only by qualified personnel
- Provision of adequate fire alarm system, fire extinguishers and fire fighting equipment
- Regular testing and maintenance of the fire alarms.
- Regular firefighting equipment maintenance carried out to relevant standards
- B.S.5306 (1) 1976 or I.S. 291.
- Carry out fire drills at regular intervals recommend every three months but minimum twice per year.
- Details of fire equipment maintenance and fire drills to be entered in the Fire Register by the Fire Marshal.
- Adequate emergency lighting will be provided and inspected quarterly to I.S 3217.
- Details of inspections of emergency lighting to be entered in the fire register.

## 8.3 Housekeeping

## Hazards

Risk of physical injury from: Fire due to build up of rubbish, empty boxes etc.

## Controls

- All rubbish, cardboard boxes rapping etc. will be removed on a daily basis.
- All boxes will be closed and replaced on racks in a tidy manner after removing parts.
- Remove empty boxes and keep floor area free of parts.
- All files shall be stored in a secure location.
- All liquid spills will be cleaned up immediately.

## 8.4 Manual Handling

## Hazards

Risk of physical injury from: Lifting, carrying, pulling and pushing of heavy items, equipment, tools or materials.

## Controls

- People engaged in lifting, carrying, pulling or pushing of loads should be trained in safe lifting techniques.
- An assessment of manual handling needs has been carried out and training will be provided.
- Training will continue to be provided as required.
- Remember only lift if you are sure, it is safe to do so, test the load and if in doubt *ask for help*.

## 10.1 Accident Reporting

Accidents and Dangerous Occurrences must be reported immediately to the Safety Representative. The Safety Representative will record details of the accident. If injury occurred as a result of an accident that necessitated the injured party to be absent from work for more than three days then it is the duty of the Coordination Committee to inform the Health and Safety Authority (HSA).

## **10.2** Accident Investigation

As soon as possible after the Accident/Incident an investigation will be carried out by the Safety Representative and a competent person.

The purpose of the investigation will be:

- 1. Determine the cause of the accident.
- 2. Identify any other contributory factors.
- 3. Determine the steps to be taken to prevent reoccurrence.

The Accident Investigation Report will be held on file by the Coordination Committee.

## Section 11.0 Customers and Visitors

Persons other than staff or trainees, while on organisation property are bound by the following rules:

- They are obliged to observe the Safety Rules and any instructions given by staff, which enforce the organisation safety policy.
- They are obliged to adhere to the organisation emergency evacuation procedures.

## Section 12.0 Information and Training

## 12.1Information

Safety Information shall be displayed/relayed in the following formats:

- Notices
- Safety and Health Committee Meetings
- Training

## 12.2 Training

- All new employees shall receive Safety and Health Induction Training.
- All employees shall receive the necessary training required to safeguard their safety and health in the performance of their duties.

## 12.2.1 Safety Health and Welfare Induction

All new employees must receive Safety, Health and Welfare Induction Training This will include an introduction to:

- Health and Safety Legislation, The Safety Policy, The Safety Statement
- Consultation, The Safety Representative, The Safety Committee
- General Duties of Employer, General Duties of Employees
- Fire Policy, Emergency Plan, Evacuation Procedure, Environmental Policy
- Housekeeping, Hazards, Welfare (canteen, toilets etc.), First Aid
- Smoking Policy, Horseplay, Accident Reporting, Question and Answer Session.

## 12.2.2 Safety, Health and Welfare Training

Other training shall be ongoing as follows based on results of risk assessments:

Fire Fighting

- Use of Fire Extinguishers
- Manual Handling
- First Aid
- VDU
- Use of work equipment

#### Section 13.0 Welfare

For the purposes of safeguarding and improving the health and welfare of all Employees, the following will be provided:

- Adequate Hygiene Facilities
- Adequate Canteen Facilities
- Access to Medical Facilities
- Availability of trained First Aiders
- Monitoring of Attendance and Absenteeism

#### Section 14.0 Safety Statement Revision

The Safety, Health and Welfare at Work Act 2005 and Regulation 5 of the 1993 General Application Regulations requires that the Safety Statement be revised if found inadequate:

- Where responsible persons are replaced or duties are changed.
- Where new procedures or processes introduce new risks.
- Introduction of new equipment.
- As and when new Health and Safety is enacted.

The revised Safety Statement should be brought to the attention of all employees and the Safety Representative.

#### Section 15.0 Directors Report

As required by The Safety, Health and Welfare at Work Act 2005, the report of the Director of Craol will evaluate the extent to which the Safety Statement was put into effect during the period covered by the report. The entry will show the level of resource committed to Safety, Health and Welfare, any special measures taken and data on occupational accident and ill health in the organisation.



## **Child Safeguarding Statement**

This Child Safeguarding Statement has been developed with due regard to, and in accordance with, the Children First Act 2015, Children First National Guidance for the Protection and Welfare of Children (2017), HSE Guidance on Developing a Child Safeguarding Statement, Guidance issued by Tusla – Child and Family Agency, and Safeguarding Guidelines for Charitable Organisations working with Children (CRA, 2020). Policies and practices satisfy the requirements set out in 'Children First: National guidance for the Protection and Welfare of Children' (Tusla).

**Location of Service:** Our services are located within our premises at c/o Involve CLG, Monksland Business Park, Athlone, Co. Roscommon, at Craol stations and occasionally at off-site events.

Services/Activities Provided: Our services are overseen by an elected Coordination Committee and implemented through our organisation structure which includes volunteers, and contractors.

Our services are implemented within the following Objectives:

1. To develop a network of licensed, not-for-profit, democratic community radio stations.

- 2. To offer education, training and support to the network.
- 3. To encourage members to build the communities which they serve, and

4. To encourage members to develop programming and activities based on the AMARC Community Radio Charter for Europe.

#### Points of Contact with Children and Families (Direct and Indirect)

Our points of contact with children includes:

- Their participation in Craol organised activities aligned with our Objectives.
- Through our correspondence including application forms, supporting documentation and marketing.

#### Profile of children and young people accessing our service:

Amongst our service users are young people aged under 18 years of age. Our service users of this age are engaged through their volunteering in our services.

#### Implementation of our Safeguarding Statement:

Our Safeguarding Statement is observed to ensure, as far as possible, that a child is safe from harm while availing of our services both within our premises and off-site.

- Implementing safe recruitment and selection of persons who have access with children during our activities.
- Persons who are conducting relevant work (as defined in Part 1 National Vetting Bureau Children and Vulnerable Persons Acts 2012 to 2016) are vetted through the National Vetting Bureau.
- All persons attend mandatory safeguarding training.
- We manage allegations of abuse or misconduct by persons of a child availing of our service.
- Child protection or welfare concerns will be reported to Tusla/Gardaí in a timely manner.
- Groups of children are always accompanied by adults while attending our organised activities.
- Practices of recording keeping are implemented including the following: attendance register, accident and incident books, consent forms and cause of concern forms. All records are kept in compliance with our Data Protection policy.
- A child in need of intimate care will be assisted only by their own carer.

#### **Risk Assessment and Management**

We have carried out an assessment of any potential harm to a child while availing of our services. Below is a list of the areas of risk identified and the corresponding procedures for managing these risks.

#### Risk Category 1: Child or young person be at risk of harm from volunteers, and contractors.

The potential risk of direct harm to a child under this risk area is low, the rationale for this includes:

- a) Any child at a Craol activity is supervised by Community Radio station members of Craol. Community Radio station members adhere to their own Safeguarding practices including;
  - Minimum of two volunteers, employees or placement staff will be present when a child is participating in activities.
  - Volunteers, employees, and placement staff are advised to avoid spending excessive amounts of time alone with a child away from others.
- b) Our service does not provide any activities which relate to physical examination and intimate care.
- c) Our volunteers and contractors participate in safeguarding training and are aware of supervision ratios.
- d) Information that comes to our Secretary about conduct of volunteers, and contractors is informed by our complaint's procedures.

# Risk Category 2: Risk of harm to a child due to a child protection or welfare concern not being recognised or reported by a volunteer, and contractor.

Concerns might come to the attention of volunteers, and contractors, and their capacity to recognise and respond to concerns is guided by their training in safeguarding, their understanding of each other's roles and responsibilities, collaboration with related child and youth agency staff. This includes clarity on reporting with access to Tusla's online portal/contact information.

#### Risk Category 3: Risk of harm to a child due to not implementing the Children First Act 2015.

Our Safeguarding Statement provides for mandatory safeguarding training, reporting thresholds, display of statement within our premises, appointment of a relevant person to be the first point of contact, and regular review of statement at Coordination Committee level.

#### Safety Checks

The policy and procedures for child protection and welfare as outlined in this document are consistent with Children First National Guidance 2017 and includes:

## a) Dealing with child protection concerns (including the management of allegations

#### of abuse against workers/volunteers)

Our Relevant Person under the Children First Act 2015 is tasked to manage allegations of abuse or misconduct by volunteers, and contractors of a child availing of our service.

#### b) Reporting child protection concerns

Child protection or welfare concerns will be directly reported to Tusla/Gardaí in a timely manner by our Relevant Person under the Children First Act 2015.

#### c) Working safely with children

We implement safe recruitment and selection of volunteers, and contractors, who have access with children during our activities. Volunteers, and contractors who are conducting relevant work (as defined in Part 1 National Vetting Bureau Children and Vulnerable Persons Acts 2012 to 2016) are vetted through the National Vetting Bureau. All volunteers, and contractors attend mandatory safeguarding training.

#### d) Recruiting and managing staff / volunteers

We implement safe recruitment and selection of volunteers, and contractors who have access with children during our activities. Our volunteers, and contractors who are conducting relevant work (as defined in Part 1 National Vetting Bureau Children and Vulnerable Persons Acts 2012 to 2016) are vetted through the National Vetting Bureau. Our volunteers, and contractors who are conducting relevant work with children are managed on an ongoing process.

## e) Roles and responsibilities (including mandated persons and the relevant person)

Relevant Person under the Children First Act 2015: T: E: chair@craol.ie

## f) Child safeguarding information and training

All volunteers, and contractors attend mandatory safeguarding training. Our volunteers, and contractors participate in safeguarding training and are aware of supervision ratios. Our Child Safeguarding Statement is available in public view on our premises.

## g) Involving parents and children

Groups of children are always supervised by their Community Radio station while in our premises.

## h) Implementing and reviewing the safeguarding strategies

We are committed to the implementation of this Child Safeguarding Statement and the procedures that support our intention to keep children safe from harm while availing of our service. Our Child Safeguarding Statement will be displayed publicly on our premises and will be made available to members of the public, and to Tusla, on request.

Craol Chairperson is tasked with implementation oversight of our safeguarding statement and will inform the Coordination Committee of issues that arise. Craol Chairperson is the 'Relevant Person' which is a legal Safeguarding requirement to appoint and is the first point of contact in respect of that Statement. In compliance with Children First Act, 2015 (sections 11.7 7 and 11.8), our Child Safeguarding Statement will be reviewed at intervals of not more than 24 months, or, as soon as practicable after there has been a material change in any matter to which the statement refers. This will include Review of Risks control document (Appendix One) which will be presented at a Coordination Committee meeting.

## i) Garda Vetting of Staff/Volunteers

Our volunteers, and contractors who are conducting relevant work (as defined in Part 1 National Vetting Bureau Children and Vulnerable Persons Acts 2012 to 2016) are vetted through the National Vetting Bureau.

## Relevant Person under the Children First Act 2015:

T:

E: chair@craol.ie

## **Appendix One**

#### Review of Risks Control Document- Child Safeguarding Statement

Risk Category	Controls (What is in place)	Is this cont place and used? Ye	being	Details of further action if required	Responsible	Timeframe
Risk Category 1: Child or young person be at risk of harm from volunteers, and contractors.						
Risk Category 2: Risk of harm to a child due to a child protection or welfare concern not being recognised or reported by a volunteer, and contractor.						
Risk Category 3: Risk of harm to a child due to not implementing the Children First Act 2015.						

 Review conducted by:
 Person 1: \_\_\_\_\_\_ Date conducted: \_\_\_\_\_\_

Date presented Coordination Committee:



## **Vulnerable Persons Safeguarding Policy**

#### Introduction

This Vulnerable Persons Safeguarding Policy has been developed with due regard to, and in accordance with, Final Draft HSE Safeguarding Adults Policy (2019), HSE Safeguarding Vulnerable Persons at Risk of Abuse' — National Policy and Procedures' (2014), Safeguarding Guidelines for Charitable Organisations working with Vulnerable Persons (CRA, 2020), National Standards for Adult Safeguarding (HIQA, 2019).

**Location of Service:** Our services are located within our premises at c/o Involve CLG, Monksland Business Park, Athlone, Co. Roscommon, at Craol stations and occasionally at off-site events.

**Services/Activities Provided:** Our services are overseen by an elected Coordination Committee and implemented through our organisation structure which includes volunteers, and contractors. Our services are implemented within the following Objectives:

1. To develop a network of licensed, not-for-profit, democratic community radio stations.

- 2. To offer education, training, and support to the network.
- 3. To encourage members to build the communities which they serve, and
- 4. To encourage members to develop programming and activities based on the AMARC

Community Radio Charter for Europe.

#### Vulnerable Persons

Our understanding of Vulnerable Persons (Adults) is informed by the National Vetting Bureau (Children and Vulnerable Persons) Acts 2012—2016 as follows:

"a person, other than a child, who - (a) Is suffering from a disorder of the mind, whether as a result of mental illness or dementia, (b) Has an intellectual disability, (c) Is suffering from a physical impairment, whether as a result of injury, illness or age, (d) Or has a physical disability, Which is of such a nature or degree - (i) As to restrict the capacity of the person to guard himself or herself against harm by another person, or (ii) That results in the person requiring assistance with the activities of daily living including dressing, eating, walking, washing and bathing".

#### Principles

Aligned with HSE Adult Safeguarding Policy (Final Draft, 2019), we are committed to the following principles:

- Safeguarding is everyone's responsibility.
- Everyone must have a 'zero tolerance' approach to any form of abuse.
- The duty to report safeguarding concerns rests with the person who has the concern.
- Any safeguarding concern should be reported immediately.
- It is necessary to ensure the immediate safety of the adult at risk of abuse.
- There should be no delay in implementing a Safeguarding Protection Plan.
- Good collaborative working is central to safeguarding. We will share relevant information that is known to us within the rules of data protection and client confidentiality.
- Any information about an adult must be managed appropriately and shared/processed on the basis of "necessity" with the HSE.

- Safeguarding should be founded on an approach where the adult is at the heart of all
- decisions and actions.
- Considerations of capacity and consent are central to adult safeguarding. The right of a person to make decisions and remain in control of their life must be respected.

#### **Preventative Approaches**

At all times, Craol adheres and promotes a "No Tolerance" approach to any form of abuse. Additionally, we are committed to best practice through the following measures:

In accordance with HSE Safeguarding Vulnerable Persons at Risk of Abuse'— National Policy and Procedures' (p.41, 2014), we have appointed Craol Chairperson who is are responsible for:

- Receiving concerns or allegations of abuse regarding vulnerable persons.
- Collating basic relevant information.
- Ensuring all reporting obligations are met (internally and externally), the Statutory Agency responsible for receiving the report is the HSE Safeguarding and Protection Team: Galway, Roscommon, and Mayo: Ms. Pauline Levins, La Nua, Ballybane, Castlepark Road, Galway Tel: 091 748432 Email: Safeguarding.cho2@hse.ie
- Maintaining appropriate records.

#### **Risk Assessment and Management**

Name of Organisation: Craol Community Radio Forum of Ireland Society Ltd.

Date of risk assessment: 9th September 2022

Name of persons who conducted: Niall Byrne and Mary Lennon

Identified person who is responsible: Claire Hall - Chairperson, Craol Coordination Committee Review date: 9<sup>th</sup> March 2024

We have carried out an assessment of any potential harm to vulnerable adults while availing of our services. Below is a list of the areas of risk identified and the corresponding procedures for managing these risks.

Description of risk: Vulnerable adult at risk of harm from volunteers, and contractors.

## Risk impact: High

#### Risk likelihood: Low

## Procedures to minimise risk

- e) Any vulnerable adult at a Craol activity is supervised by Community Radio station members of Craol. Community Radio station members adhere to their own Safeguarding practices including;
- f) Minimum of two volunteers, employees or placement staff will be present when a vulnerable adult is participating in activities. Volunteers, employees, and placement staff are advised to avoid spending excessive amounts of time alone with a vulnerable adult away from others.
- g) Our service does not provide any activities which relate to physical examination and intimate care.
- h) Our volunteers and contractors participate in safeguarding training and are aware of supervision ratios.
- i) Information that comes to our Secretary about the conduct of volunteers and contractors is informed by our complaint's procedures.

**Description of risk:** Risk of harm to a vulnerable adult from a service user (adult or child), visitor or member of the public (includes online risk).

#### Risk impact: High

#### Risk likelihood: Low

#### Procedures to minimise risk

For vulnerable adults who participate in our services, we organise our activities with appropriate

supervision ratios. We regularly collaborate with other lead agencies such as community and statutory disability services which have safeguarding procedures in place. When vulnerable adults are on our premises, we have a dedicated toilet for them to use, waiting areas are supervised appropriately and our security measures include the required sign-in registration for all at the front reception desk. Our online activity is managed through dedicated user names and passwords and we have a mechanism in place for monitoring social media usage.

**Description of risk:** Risk of harm to a vulnerable adult due to a welfare concern not being recognised or reported by a volunteer, and contractor. **Risk impact:** High **Risk likelihood:** Low

#### Procedures to minimise risk

Concerns might come to the attention of volunteers, and contractors and their capacity to recognise and respond to concerns is guided by their training in safeguarding, their understanding of each other's roles and responsibilities, collaboration with related vulnerable adult agency staff. This includes clarity on reporting with access to HSE's online portal/contact information.

**Description of risk:** Risk of harm to a vulnerable adult due to not implementing the Final Draft HSE Safeguarding Adults Policy (2019), HSE Safeguarding Vulnerable Persons at Risk of Abuse' — National Policy and Procedures' (2014). **Risk impact:** High

**Risk likelihood:** Low

#### Procedures to minimise risk

Our Safeguarding Statement provides for mandatory safeguarding training, reporting thresholds, display of statement within our premises, appointment of a relevant person to be the first point of contact, and regular review of statement at Board level.

#### Recruiting and managing volunteers, and contractors

In compliance with National Vetting Bureau (Children and Vulnerable Persons) Act 2012-2016, we require that all volunteers, and contractors who participate in relevant work or activities as defined in Schedule 1 Parts 1 and 2 of the Act are vetted by the National Vetting Bureau.

#### Safeguarding awareness and training

Craol will identify training needs of volunteers, and contractors as part of our recruitment process, within safeguarding practices including safeguarding awareness and training. As part of our induction process specific training in Safeguarding awareness of Vulnerable Persons will be conducted including circulation and discussion of this policy.

#### Notifying statutory agencies

In accordance with HSE Safeguarding Vulnerable Persons at Risk of Abuse'— National Policy and Procedures' (p.41, 2014), we have appointed our Chairperson as the Designated Officer who is responsible for:

- Receiving concerns or allegations of abuse regarding vulnerable persons.
- Collating basic relevant information.
- Ensuring all reporting obligations are met (internally and externally), the Statutory Agency responsible for receiving the report is the HSE Safeguarding and Protection Team: Galway, Roscommon, and Mayo: Ms. Pauline Levins, La Nua, Ballybane, Castlepark Road, Galway Tel: 091 748432 Email: Safeguarding.cho2@hse.ie
- Maintaining appropriate records.

#### Responding to concerns or allegations of abuse of vulnerable persons

It is of the utmost importance that disclosures are treated in a sensitive and discreet manner. Anyone responding to a vulnerable adult making such a disclosure should take the following steps.

(a) Take what the vulnerable adult says seriously.

(b) React calmly, as over-reaction may intimidate the vulnerable adult and increase any feelings of guilt that they may have.

(c) Reassure the vulnerable adult that they were correct to tell somebody what happened.

(d) Listen carefully and attentively.

(e) Never ask leading questions.

(f) Use open-ended questions to clarify what is being said and try to avoid having them repeat what they have told you.

(g) Do not promise to keep secrets.

(h) Advise that you will offer support but that you must pass on the information.

(i) Do not express any opinions about the alleged abuser to the person reporting to you.

(j) Explain and make sure that the vulnerable adult understands what will happen next. Do not confront the alleged abuser.

#### Reporting concerns or allegations of abuse of vulnerable persons

Following a disclosure of abuse, volunteers, and contractors should:

Write down immediately after the conversation what was said, including all the names of those involved, what happened, where, when, if there were any witnesses and any other significant factors and note any visible marks on the individual making the report or any signs you observed.

(a) Record the event, sign, and date all reports and indicate the time the notes were made.

- (b) Ensure that the information is treated with the utmost confidence.
- (c) Allegations should not be investigated by volunteers, and contractors.

(d) Volunteers and contractors should pass that report to the Designated Officer.

Under no circumstances should a vulnerable adult be left in a situation that exposes him or her to harm or to the risk of harm. In the event of an emergency where you think a vulnerable adult is in immediate danger you should contact the Gardaí in the first instance.

#### **Review Process**

Our Coordination Committee is tasked with implementation oversight of our safeguarding policy. In good governance our safeguarding policy will be reviewed at intervals of not more than 18 months, or, as soon as practicable, after there has been a material change in any matter to which the statement refers.

## Appendix One Review of Risks Control Document

Risk Category	Controls (What i	sIs this	contro	l in place	Details of further	Responsible	Timeframe	
	in place)	and	being	used?	action if required			
		Yes/No	0					Review
Vulnerable adult at risk of harm from volunteers, and contractors.								KUVIUV
Risk of harm to a vulnerable adult from a service user (adult or child), visitor or member of the public (includes online risk).								
Risk of harm to a vulnerable adult due to not implementing the Final Draft HSE Safeguarding Adults Policy (2019), HSE Safeguarding Vulnerable Persons at Risk of Abuse' — National Policy and Procedures (2014).								
conducted by:	1				1	1	1	l

	Person 1:	Person 2:	Date conducted:
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Date presented Coordination Committee:



## **Risk Management Policy**

#### 1. Introduction

The Craol Community Radio Forum of Ireland Society Ltd, hereafter referred to as Craol, Risk Management Policy is designed to provide guidance regarding the identification, assessment and management of risks, to support the aims and objectives of the organisation, to protect staff, learners and volunteers, to protect resources and to inform the ongoing improvement of services and training.

It is the responsibility of Craol and of individual Craol stations to maintain a risk register and ensure regular risk assessments are carried out regarding premises, equipment, training and learning.

#### 2. Scope

This policy is directed to all members of Craol, including staff, trainers, learners, volunteers and associated external staff.

#### 3. Date of Issue

This policy was implemented in April 2008 and last reviewed on September 2022. It is subject to annual review and can also be altered depending on risk assessment results, or changes in legislation.

#### 4. Aims of Policy

The Craol Risk Management Policy provides an overview of the risk management structure in the organization, indicating who is involved in risk management, their responsibilities and the areas covered. It complements the risk management strategies which are included in Craol's Quality Assurance Manual. (See bottom of policy)

This policy provides a framework that is accessible to all members, learners, contracted staff and volunteers of the organisation. A systematic approach to the identification, assessment, and management of risk includes ensuring that each level of the organisation functions according to its legal, ethical, educational and reputational obligations.

#### The Craol Coordination Committee has responsibility for:

- Ensuring that the organisation has effective risk identification, assessment and management in place.
- Delegating authorities and responsibilities.
- Approving the completed risk management policy and procedures.
- Reviewing the ongoing effectiveness of the risk management process in achieving the organisation's objectives.
- Develop operational policies for dealing with and reporting identified areas of risk.
- Implement a culture of risk awareness risks as innovation and strategic opportunity.
- Ensuring that the risk management policy and procedures are understood across the organisation by communicating the policy and subsequent procedures to all Craol stations.
- Ensuring staff are consulted in respect of risk management issues.

- Ensuring risk management procedures are effectively applied.
- Identification, assessment and reporting of risk regarding crossover between corporate decision making and programme/module development.

#### The Craol Academic Committee has responsibility for:

- Identification, assessment and reporting of risk pertaining to training and learning practices in the organisation.
- Identification, assessment and reporting of risk regarding crossover between corporate decision making and programme/module development.
- Ensuring the development of a reporting mechanism for all emerging risks.

#### **Contracted staff of Craol are responsible for:**

- Being aware of the risk management system relevant to their positions.
- Complying with all policies and procedures.
- Reporting any real or perceived risks to the health, safety and working environment of themselves, their colleagues, or associated stakeholders.
- Reporting any real or perceived risks that may significantly affect the performance or reputation of the organisation or expose it to legal or financial risk.
- Report on improvement strategies they identify.

#### Craol stations have responsibility for:

Identifying, assessing, and reporting and controlling risks in relation to:

- Staff
- Volunteers
- Premises
- Equipment
- Compliance
- Finance

Risks relating to children and vulnerable adults are outlined in the Child Protection and Vulnerable Adult Protection Policies.

#### Risk Identification and Management Strategies are as follows:

#### **Governance: Board members**

#### **Risk Identification**

- Awareness of roles and responsibilities for board members.
- Conflict among board members.
- High turnover of board members.
- Conflict of interests.
- Compliance with statutory, regulatory and core guidelines.
- Absences in attending meetings, failure to follow up on actions monitored.
- Inappropriate behaviour.

#### **Risk management strategies**

- The Craol Governance Handbook addresses many of the risk identification issues that may arise within the Coordination Committee.
- Clear identification of roles and responsibilities. (Craol Governance Handbook, pps 6-8
- The Craol Coordination Committee brings together a broad range of talents, skills, and experiences. Conflict among committee members regarding decision making is addressed in the *Craol Governance Handbook, pps 9 and 22*
- Committee Members are expected to commit to their roles: *See Craol Governance Handbook, 7.* In the case of an unusually high turnover of members the board will discuss, identify any issues and adapt changes to alter this.
- Each member of the Coordination Committee will sign the *Code of Conduct* on becoming a board member. See Craol Governance Handbook, 22
- Craol board members are expected to adhere to the Conflict-of-Interest Policy: See Craol Governance Handbook, p 22
- Craol implements an annual review of Coordination Committee Governance. This includes a review of finances, resources, legality, regulatory and statutory compliance, data protection and other policies and procedures.

#### **Coordination Committee: organisational responsibilities**

#### **Risk Identification**

- Assets: Finance sub-working group
- Legality: Governance sub-working group
- Accountability: Craol Training Team.
- Direction: CCC

#### **Risk Management**

- Ensuring we have enough resources to run Craol and that funds are managed well.
- Meet any legal obligations of Craol under applicable laws
- Systems in place to ensure that there is no crossover between corporate decision making and programme/module development.
- Provider not engaged in activities or partnership that would undermine the integrity of the training offered or the awards available.

#### Academic Committee

#### **Risk Identification**

- Academic integrity
- Fraud/plagiarism
- Results approval

#### **Risk Management**

- Ensuring that training delivered by Craol is in accordance with all relevant legislation and regulations.
- Commitment to ongoing self-evaluation. Blind 'double evaluation' on learners' records/assessments already made or in process.
- Ensure the objectives of modules delivered are clearly specified and learners are aware of the criteria for achieving an award.
- Transparency regarding internal results approval prior to submission.
- Ensuring there is no crossover between corporate decision making and programme/module development.

#### Trainers

#### **Risk Identification**

- Skills and Experience
- Health and Safety
- Resources
- Data Protection

#### **Risk Management**

- Transparency of trainer qualifications.
- Trainers are given information regarding Health and safety issues on induction and assessments of learning environments carried out on a regular basis.
- Trainers are given access to all policies relating to learner needs, in particular Programme/Module Development and Approval, Learner Evaluation, Data Protection /Retention, Equality and Diversity Policy, Disability, Reasonable Adjustments, Safeguarding, Complaints, Appeals, Malpractice and Maladministration, Health and Safety, Bullying, Teaching and Learning Policy and Risk Assessment Policies.
- Data collated is retained in according with GDPR and Data Protection/Retention
- Trainers forward registration forms to project coordinator for approval.

#### **Project Coordinator**

#### **Risk Identification**

- Data collection carried out in compliance with GDPR and Craol policies and procedures.
- Accuracy of administration data, i.e. calls, letters, emails, documentation.

#### **Risk Management**

- Project Coordinator is aware of Craol Data Protection/Retention Policies and GDPR
- All administration checked. (See Maladministration and Malpractice policies)
- Checking marking and assessment processes for errors/plagiarism.

#### Te<u>chnical</u>

#### **Risk Identification**

- Technical Equipment
- Use of technical equipment
- Data Protection/Retention
- Health and Safety

#### **Risk Management**

- Trainers responsible for monitoring equipment in studio
- Proper training in use of technical equipment
- Assessment of equipment on regular basis
- Training in the importance of data protection/retention in regard to using studio equipment.



## **Craol Conflict of Interest Policy**

#### 1. Introduction

The Craol Conflict of Interest Policy is designed to ensure that conflicts of interest within the Community Radio Forum of Ireland Society Limited, hereafter referred to as Craol, are effectively identified, recorded and managed in order to protect the integrity of the organisation and to ensure that the Coordination Committee act in the best interest of the organisation.

#### 2. Scope

This policy is aimed at the Governance body of Craol (Craol Coordination Committee), the Craol Academic Committee, sub-committees of Craol and any other internal or external contracted staff or interested parties.

#### 3. Purpose

This policy aims to ensure that members of the organisation are aware of their obligations to disclose any conflicts of interest that they may have, and to comply with this policy to ensure they effectively manage those conflicts of interest as representatives of the organisation.

#### 4. Date of Issue

This policy was issued on 2008 and will be reviewed annually.

#### 5. Definition of conflicts of interests

A conflict of interest is any situation in which a member of the Craol Coordination Committee, the Craol Academic Committee's, or any active sub-committee's personal interests or loyalties could, or could be seen to, prevent the organisation from making a decision in the best interests of the organisation. This personal interest may be direct or indirect. These situations present the risk that a person will make a decision based on, or affected by, these influences, rather than in the best interests of the charity and therefore must be managed accordingly.

#### 6. Policy

This policy has been developed because conflicts of interest commonly arise, and do not need to present a problem if they are openly and effectively managed. It is the policy of Craol as well as a responsibility of its Coordination Committee that ethical, legal, financial or other conflicts of interest be avoided and that any such conflicts (where they do arise) do not conflict with their obligation to the organisation. It is the responsibility of the Craol Academic Committee that conflict or interests which would impact on the effective development or delivery of QQI accredited modules.

The organisation will manage conflicts of interest by requiring members to:

- Avoid conflicts of interest where possible
- Identify and record any conflicts of interest
- Carefully manage any conflicts of interest, and
- Follow this policy and respond to any breaches.

#### 6.1 Responsibility of the Coordination Committee

The CCC have overall responsibility for:

- Establishing a system for identifying, disclosing and managing conflicts of interest across the organisation;
- Monitoring compliance with this policy; and
- Reviewing this policy on an annual basis to ensure that the policy is operating effectively.

#### 6.2 Identification and disclosure of conflicts of interest

Once an actual, potential or perceived conflict of interest is identified, it must be entered into Craol's register of interests. The register of interests must be maintained by the Secretary, and record all information related to a conflict of interest (including the nature and extent of the conflict of interest and any steps taken to address it).

#### **Confidentiality of disclosures**

Actual, potential or perceived conflict of interest once identified and recorded will be maintained in the register of interests. As with all documents belonging to the Board this will remain confidential. Current members of Board will have access to this register and the information contained. The Board, if necessary, may decide to share register information through their normal governance mechanisms (decision made at Board meeting), this may also include a legal obligation to extend confidentiality.

#### 7. Action required for management of conflicts of interest

7.1 Conflicts of interest of members of the board.

Once the conflict of interest has been appropriately disclosed, the CCC (excluding the disclosing member and any other conflicted person) must decide whether or not a conflicted member should:

- vote on the matter,
- participate in any debate, or
- be present in the room during the debate and the voting.
- 1.2 In exceptional circumstances, such as where a conflict is very significant or likely to prevent a board member from regularly participating in discussions, it may be worth the board considering whether it is appropriate for the person with the relevant conflict to resign from the CCC.
- 1.3 What should be considered when deciding what action to take:

In deciding what approach to take, the board will consider whether the conflict needs:

- to be avoided or simply documented
- Whether the conflict will realistically impair the disclosing person's capacity to impartially participate in decision-making
- Alternative options to avoid the conflict
- The boards objects and resources, and
- The possibility of creating an appearance of improper conduct that might impair confidence in, or the reputation of the organisation.

The approval of any action requires the agreement of at least a majority of the board (excluding any conflicted member) who are present and voting (if applicable) at the meeting. All details regarding the conflict of interest, including the action arising, will be recorded in the minutes of the meeting.

#### 8. Compliance with this policy

If the Coordination Committee has a reason to believe that a person subject to this policy has failed to comply with it, it will investigate the circumstances.

If it is found that this person has failed to disclose a conflict of interest, the board may take action against the person. This may include seeking the person's resignation from the organisation and will be aligned with our governance documents.

If a person suspects that a Board member has failed to disclose a conflict of interest, they must, notify the person responsible for maintaining the register of interests.



## Training, Learning and Assessment Policy

#### 1. Introduction

The Craol Community Radio Forum of Ireland Society Ltd, hereafter referred to as Craol, training, Learning and Assessment Policy facilitates non-didactic, collaborative learning, empowering members of local communities throughout the country and providing a structure whereby they can own and manage their own individual community radio. The policy is based on Craol's vision and mission statement:

#### "To empower and support community broadcasters to deliver a social benefit to their communities through active volunteerism, shared resources, good governance, partnership and networking."

Craol training is delivered in line with the guidelines laid down by the Education and Training Act, 2012-2019, the National Framework of Educational Qualifications and QQI Quality Assurance Guidelines.

#### 2. Scope

This policy is aimed at all Craol staff involved in training and learning, learners who undertake Craol modules and all interested external parties.

#### 3. Date of Issue

This policy was implemented in April 2008 and last reviewed on September 2022. It is subject to review annually or in accordance with learner/trainer feedback or legislation regarding education in Ireland.

#### 4. Aims of Craol Training, Learning and Assessment Policy

#### 4.1 Learning Environment

To ensure the best learning outcomes for learners and trainers Craol encourages a learning environment that:

- Is open, communicative and collaborative.
- Integrates the educational ethos and practice of the organisation throughout the learning experience.
- Adheres to the guidelines laid down by the Education and Training Act, 2012-2019, the National Framework of Educational Qualifications and QQI Quality Assurance Guidelines.
- Commits to providing qualified and experienced trainers who are familiar with adult learning and who provide a learning environment that is conducive to learner's ongoing development and progress.
- Delivers training and learning activities that are professional, positive and engaging.
- Ensures that practical assessments are monitored and assessed fairly and in accordance with

module outcomes expectations.

- Provides training venues and equipment that are subject to safety checks and are fit for the purpose they are intended for.
- Ensures that all evaluations and feedback forms are monitored, documented and referred to the Craol Project Coordinator and two Craol Coordination Committee members.
- Ensures that learners are aware of what plagiarism entails. Plagiarism is unacceptable and must be avoided at all times. Your assessments must be your own work. You cannot borrow or copy work from other sources on the Internet, books, or journals.
- Allows changes and adaptations to be implemented in order to ensure improvement of existing and future modules delivered as necessary.
- Provides learners with a quality assured standard of accreditation, adhering to best educational guidelines and practices.

#### 4.2 Assessment and Evaluation Procedures

To ensure a promotion of fair and transparent assessment and evaluation procedures:

- Assessment policies, processes and procedures are available to learners and trainers.
- Assessment procedures, evaluation processes and expected outcomes are explained orally on commencement of modules, prior to assessment and available in the Learner Handbook.
- Assessment methods are appropriate to the module delivered and effectively demonstrate learner's level of skills and in line with QQI core guidelines.
- Learners are given the opportunities to familiarise themselves with studio equipment during the module and prior to assessment.
- Marking schemes and assessment procedures are clearly explained during the module and prior to assessment.
- Learner performance is assessed, evaluated and monitored mid-module and on completion of module.
- Learner feedback forms are provided and used mid-module and on completion of module.
- A skills demonstration that follows the QQI policies and criteria for validation of programmes is carried out at the end of each module.
- Learners are given the opportunity to discuss special consideration needs and reasonable adjustments that are required for assessment process prior to beginning module.
- Learners are informed of their right to appeal if unhappy with any aspect of their assessment.
- Ensuring learner projects, records, assessments are retained in a secure manner in line with Craol Data Protection and Data Retention Policies and GDPR guidelines
- Ensuring materials and equipment are up to date and has been assessed for safety prior to skills demonstration assessment.
- Ensuring all work submitted is verified and signed off by learners as being their own work, receipted and time stamped, logged and kept securely prior to and after assessment process.
- Learners are kept informed of their progress throughout and on completion of modules orally via learner/trainer or class discussions, and through a collaborative and inclusive ethos of training.

## 4.3 Certification

Craol's Assessment and Authentication Process follows the guidelines laid down by QQI.

• The Craol Project Coordinator and a member of the Academic Committee verity that all

assessment procedures have been applied.

- Assessment results are monitored via a sample basis.
- A qualified independent QQI approved external authenticator is employed to authenticate results.
- External authenticator moderates' assessment results by sampling learner evidence according to the providers sampling strategy.
- A Results Approval Panel is created which includes the Craol Project Coordinator, a member of the Academic Committee and a member of the CCC.
- Assessment results are signed off.
- Learners are informed regarding results.
- Learner results are submitted for certification.
- Results data is monitored and documented for future analysis.
- Learners have the right to appeal any decisions they disagree with.



## **Access, Transfer and Progression Policy**

#### 1. Introduction

Craol Community Radio Forum of Ireland Society Ltd, hereafter referred to as Craol, is committed to providing clear information on module admission, transfer, progress pathways and achievable awards and qualifications. In line with QQI guidelines and the Qualifications and the Quality Assurance (Education and Training Act) 2012 to 2019, this policy includes processes and procedures relevant to admission procedures, transfer and progress pathways.

#### 2. Scope

This policy is directed to Craol learners and trainers, members of the Craol Academic Committee, the Training and Quality Assurance Team and other interested parties.

#### 3. Date of Issue

This policy was implemented in March 2023 and will be reviewed annually or in accordance with any changes to Quality Qualifications Ireland (QQI) guidelines or Education legislation.

#### 4. Aims of Policy

This policy sets out to clarify the processes and procedures regarding the admission of learners, Prior Recognition of Learning (PRL) and transfer and progression pathways for Craol learners.

#### 4.1 Access, Transfer and Progression

Craol, in line with QQI guidelines, defines Access, Transfer and Progression in the following way:

- 4.1.1 Access the process by which learners may commence a programme of education and training having received recognition for knowledge, skill or competence that meets entry requirements. This includes Recognition of Prior Learning. (See Craol RPL Policy)
- 4.1.2 Transfer the process by which learners may transfer from one programme of education and training to another programme having received recognition for knowledge, skill and competence acquired.
- 4.1.3 Progression the process by which learners may transfer from one programme of education and training to another programme.

#### 5. Access

- (a) Craol is committed to an ethos of equality and inclusion and will endeavour to accommodate all applicants to Craol modules.
- (b) Admission to modules is subject to the availability of trainers, satisfying entry requirements and assessment of recognised prior learning, both formal and informal.
- (c) Learners can access available Craol modules through Craol station websites, social media platforms, through on-air notices, local print media or by directly contacting stations.
- (d) Potential learners will be given documented information on all aspects of the module offered, including time frames, dates, accommodation, methods of presentation, marking guidelines, appeals/complaints procedure, assessment methods and recognised prior learning.

#### 5 Transfer and Progression

- 5.1 Learners have the right to transfer from one module to another providing that they have received recognition for the knowledge, skill and competence acquired.
- 5.2 In keeping with Craol's commitment to transparency, entry criteria is clearly defined for each module and this is also discussed with the trainer on admission to the module. Learners are also given a copy of the NQF and accompanying grid on admission to the module
- 5.3 Learners are informed of their right to appeal decisions made about transfer.
- 5.4 Learners have the right to information regarding progression pathways relevant to their skills, knowledge and experience. This includes merging current learning with past learning/experience.



## **Recognised Prior Learning (RPL) Policy**

#### 1. Introduction

A major objective of the National Framework of Qualifications is to recognise all learning achievements. It aims to do this by supporting the development of alternative pathways to qualifications (or awards) and by promoting the recognition of prior learning.

Craol Community Radio Forum of Ireland Society Ltd, hereafter referred to as Craol, is committed to providing training for all members of the community and recognises that learning occurs in many contexts that include work, involvement in social and community activities, or learning through life experience generally. Craol is committed to including Recognised Prior Learning in its assessment and accreditation process.

#### 2. Scope

This policy is directed to Craol learners and trainers, members of the Craol Academic Committee, the Training and Quality Assurance Team and other interested parties.

#### 3. Date of Issue

This policy was implemented in March 2023 and will be reviewed annually or in accordance with any changes to Quality Qualifications Ireland (QQI) guidelines or Education legislation.

#### 4. Aims of Policy

This policy sets out to clarify the processes and procedures regarding the Recognition of Prior Learning (PRL), for assessment and accreditation purposes.

#### 5. Stages of Craol RPL processes

- 5.1 The learning environment offered by providers should respect and attend to the diversity of learners and their needs and should enable flexible learning pathways.
- 5.2 Requests for RPL will be considered on a case-by-case basis by Craol.
- 5.3 The trainer will provide information on how to apply for RPL. It is the learner's responsibility to provide documentation or demonstrate appropriate skills and knowledge that may be used against achievable outcomes.
- 5.4 The trainer will assess the relevant skills and identify them in accordance with the NFQ The Trainer will assess the relevant skills of the prospective learner against the NFQ Grid of Level Indicators. This process can apply to non-formal and informal learning.
- 5.5 non-formal and informal learning will be taken into account for assessment for entry to a module only. It does not apply to RPL for certification. (See below for RPL and certification.)

5.6 Certification of prospective learner's prior skills and knowledge entails establishing that the full outcomes of the module are satisfied.

## 6. **RPL** Assessment process

- 6.1 Learners who apply for RPL are required to:
  - (a) Attend an interview with the trainer.
  - (b) Submit relevant documentation, in the case of formal recognised learning.
  - (c) Complete an assessment given by the trainer, using the regular module assessment instruments for the module being applied for.
  - (d) If the entry criteria is satisfied through prior learning, either formal, informal or experiential the applicant will be offered access to the module.

#### 7. **RPL for Certification**

- 7.1 Learners who apply for RPL regarding certification are required to:
  - (a) Provide proof of credit accumulation sufficient for certification.
  - (b) Provide formal assessment results.
  - (c) The assessment results should be in line with the expected outcomes and results required for the course certification being applied for.

## 8. Appeals Process

- 8.1 Learners have the right to appeal admission decisions impacted by recognised prior learning processes. Appeals should be completed by writing to qqi@craol.ie
- 8.2 The Appeal will be submitted to the Training and Quality Assurance committee within 5 working days of decision.
- 8.3 The applicant will be notified of the committee's decision within 5 working days. The committee's decision is final.

## **QQI** Awards Framework Grid

	level 1	LEVEL	LEVEL 3	LEVEL	LEVEL 5	LEVEL	LEVEL	LEVEL	LEVEL 9	level 10	
KNOWLEDGE BREADTH	Elementary knowledge	Knowledge that is narrow in range	Knowledge moderataly broad in range	Broad range of knowledge	Broad range of knowledge	Specialized knowledge of a broad area	Specialized knowledge acrose a variety of areas	An understanding of the theory, concepts and methods pertaining to a their (or fields) of learning	A systematic understanding of knowledge, at, or informed by, the forefront of a field of learning	A systematic acquisition and understanding of a substantial body of knowledge which is at the torefrom of a tield of learning	KNOWLEDGE BREADTH
KNOWLEDGE KIND	Demonstrable by recognition or recall	Concrete in reference and basic in comprehension	Mainly concrete in reference and with some comprehenation of relationship between knowledge elements	Mainly concrete in reference and with some elements of abstraction or theory	Some theoretical concepts and abstract thrwing with significant depth in some areas	Some theoretical concepts and abstract thinking, with significant underpinning theory	Recognition of limitations of current knowledge and familianity with sources of new knowledge: Integration of concepts across a variety of areas	Detailed innoviedge and understanding in one or more specialized areas, some of it at the current boundaries of the field(s)	A critical awareness of current problems and/or new insights, generally informed by the forefront of a field of learning	The creation and interpretation of new Knowledge, through original rasearch, or other advanced scholarship, of a quality to satisfy review by peers	KNOWLEDGE KINE
KNOW-HOW & SKILL RANGE	Demonistrate basic practical skills and carry our direct activity using basic tools	Demonstrate limited range of basic practical skills, including the use of relevant tools	Demonstrate a limited lange or practical and cognitive	Demonstrate a moderate range of practical and cognitive skills and tools	Denice strate a broad range of apocialized skills and tools	Demonstrate comprohensive range of specialised skills and tools	Demonstrate special ised tochnical, creative or conceptual skills and tools across an area of study	Demonstrate mestery of a complex and specialised area of skills and tools: use and modify advanced skills and tools to conduct closely guided research, professional or advanced technical activity.	Demonstrate ansage of standard and opecialized research or quivalent cools and techniques of enquiry.	Demonstrate a significant range of the principal skills, torchingues, tools, practices and/ or materials which are associated with a field of learning develop new skills, tochniques, tools, practices and/or materials	KNOW-HOW & SKILL RANGE
KNOW-HOW & SKILL SELECTIVITY	Perform processes that are repetitive and predictable	Perform a sequence of routine tasks given clear direction	Select from a limited range of varied procedures and apply known volutions to a limited range of predictable problems	Select from a range of procedures and apply known solutions to a variety of predictable problems	Evaluate and use information to plan and develop investigative strategies and to determine solutions to varied unfemiliar problems	Formulate responses to well-defined abstract problems	Exercise appropriate judgement in planning, design, technical and/ or supervisory functions related to products, services, operations or processes	Exercise appropriate judgement in a number of complex planning, design, technical and/or management functions related to products, sarriced, operations or processes, including resourcing	Select from complex and advanced skills across a tiels of learning: develop new skills to a high lovel, including novel and emerging tachniques	Respond to abstract problems that expand and redefine existing procedural knowledge	KNOW-HOW & SKILL SELECTIVITY
COMPETENCE CONTEXT	Act in closely defined and highly structured contexts	Act in a limited range of predictable and and structured contexts	Act within a limited range of contexts	Act in familiar and unfamiliar contexts	Act in a range of varied and specific contexts, taking responsibility for the sature and quality of outputs identify and apply skill and knowledge to a wide variety of contexts	Act in a range of varied and specific contexts involving creative and non-routine activities, transfer and apply the cortical concepts and/ or technical or creative skills to a range of contexts	Utilise diagnostic and creative skills is a range of functions in a wide variety of contexts	Use advanced skills to conduct research, or advanced technical or professional activity, accepting accountability for all related doctsion making, traisifur and apply disgnostic and creative akills in a range of contexts	Act in a wide and often unpredictable variety of professional levels and ill defined contexts	Exercise personal responsibility and largely autonomous initiative in complex and unpredictable aituations, in professional or equivalent contexts	COMPETENCE CONTEXT
COMPETENCE ROLE	Act in a fimited range of roles	Act in a range of roles under direction	Act usder direction with limited autonomy: function within familiar, homogeneous groupe	Act with considerable amount of responsibility and automorey	Exercise some initiative and independence in carrying out defined activities, join and function within meltiple, complex and heterogeneous groups.	Exercise substantial personal autonomy and offen take responsibility for the work of others and/or for the allocation of responses, form, and function within, multiple, complex and heterogeneous groups	Accept accountability for determining and achieving personal and/ or group outcomes: take aignificant or supervisory responsibility for the work of others in defined areas of work	Act affectively under guidance in a peer relationship with qualified practitionies; lead multiple, comptox and heterogeneous groups	Take significant responsibility for the work of individuals and groups, lead and initiate activity	Communicate results of research and innovation to peers engage in critical dislogue; lead and originate complex social processes	COMPETENCE ROLE
COMPETENCE LEARNING TO LEARN	Learn to sequence Learning tasks, learn to access and use a range of learning resources	Learn to learn in a disciplined manner in a well-structured and supervised environment	Learn to learn within a managed environment	Learn tó take responsibility for own learning within a supervised environment	Learn to take responsibility for own learning within a managed environment	Learn to evaluate own learning and identify needs within a structured learning environment bosist others in identifying learning seeds	Taxe initiative to identify and address learning needs and interact affective) in a learning group	Learn to act invariable and unfamiliar learning contexts, learn to managatearning tasks independently, professionally and ethically	Learn to self-evaluate and take responsibility for continuing as ademic/ professional development	Learn to oritique the broader implications of applying knowledge to particular contexts	COMPETENCE LEARNING TO LEARN
COMPETENCE	Begin to demonstrate awarenesss of independent role for self	Demonstrate swareness of independent role for self	Assume limited responsibility for consistency of self-understanding and behaviour	Assume partial responsibility for consistency of over-understanding and behaviour	Assume full responsibility for consistency of self-understanding and behaviour	Express an internalised, personal world view, reflecting engagement with others	Express an internalised, personal world view, manifesting solidarity with others	Express a comprehensive, internalised, personal world view manifesting solidarity with others	Scrutiniae and reflect on accial norma and relationships and act to change them	Scrutinise and reflect on accial norms and relationships and lead action to change them	COMPETENCE INSIGHT



## **Programme (Module) Development and Approval Policy**

## 1 Introduction

Craol Community Radio Forum of Ireland Society Ltd, hereafter referred to as Craol, is committed to the development and delivery of quality assured modules which meet the criteria of the 2012-2019 Education and Act and QQI core guidelines. Craol's Programme (Module) Development and Approval Policy sets out the processes for the development of Craol QQI modules.

#### 2 Scope

This policy is aimed at Craol staff who are involved in the development and delivery of QQI approved modules; Craol registered trainers, the Craol Academic Committee, the Training and Quality Assurance Team, Craol Project Coordinator, external stakeholders.

#### 3 Date of Issue

This policy was implemented in 2008 and March 2023. It is subject to annual review or in accordance with changes in education legislation.

#### 3 Aims of Policy

This policy aims to set out the procedures regarding the development and approval of new modules for submission to QQI for validation and approval.

#### 4 **Programme/Module Development and Approval**

- 5.1 Programme/Module development must be designed and delivered in line with QQI policies and criteria for the validation of programmes of education and training, enabling learners acquire the skills necessary for submission for an award and be assessed on those skills.
- 5.2 Programme/Module development and approval procedures must be open to feedback and evaluation and may be adapted to suit any changes in QQI guidelines or education guidelines.
- 5.3 Programme/Module development procedures rigorously examines all elements of the development process from conception to submission for validation.
- 5.4 Programme/Module development includes input from trainers, the Training and Quality Assurance Committee, Craol Project Coordinator, Academic Committee, Programme/Module Development Team, the CCC and interested external stakeholders.
- 5.5 Modules must clearly state module descriptors, expected outcomes and what is expected from learners in relation to validation of marks and awards offered.
- 5.6 Modules must be developed and delivered in line with Craol's QAS, the organisations Ethos of delivering social benefit to local communities and NFQ, QQI Access, Transfer and Progress and Recognised Prior Learning Guidelines.

5.7 All Craol modules must be submitted to QQI for validation before they can be offered to learners. All Craol modules are reviewed and evaluated during and on completion of the module.

#### 1. Programme/Module Development and Approval Process

- 6.1 Modules are developed in response to learner and local community needs, current communication and media requirements/developments and the facilitation of the organisation's mission and purpose.
- 6.2 Proposals for new modules come from trainers, the Training and Quality Assurance Committee, member stations, industry or stakeholders.
- 6.3 The Craol Academic Committee carry out feasibility testing on evidence-based need for proposed module, appropriate learning outcomes, awards offered, the availability of registered Craol trainers, Access, Transfer and Progression routes, access and the overall module brief.
- 6.4 A report is sent to the Craol Coordination Committee who determine that there are sufficient resources in place to deliver the module, including financial, environmental, trainers and agreement from relevant Craol stations.
- 6.5 A Programme/Module Development Team is appointed to develop a module descriptor and contents. This information then sent to the Academic Committee who examine the module descriptor against QQI Criteria for Validation and Craol QA Policies and Procedures. If viable the module is recommended to the Craol Coordination Committee for submission to QQI for validation.

#### 7. Validation

- 7.1 If validated, Craol trainers are offered a CPD workshop relevant to the module. A pilot module is delivered to learners. On completion of this module the trainers will meet with the Training and Quality Assurance Committee and Project Coordinator for critique and a report is sent to the Academic Committee.
- 7.2 Feedback from learners, trainers, the internal verifier, external authenticator and the results approval panel will be reviewed by the Academic Committee and Quality Assurance Committee. A report will be sent to the Craol Coordination Committee and communication will be sent to relevant trainers.
- 7.3 If the validation process is unsuccessful the Craol Coordination Committee will meet hold a meeting to decide whether resubmission is a viable option. Recommendations will be taken from the Programme/Module Development Team along with suggested amendments required by QQI. These changes will be presented to the Academic Committee and if approved the module will be resubmitted to QQI for validation.
- 7.4 In the case that the Craol Coordination Committee decide not to progress the module any further, communication is relayed to the Academic Committee, the Training and Quality Assurance Committee, relevant trainers, member stations and external stakeholders.



## **Plagiarism Policy**

#### **1** Introduction

This Craol Community Radio Forum of Ireland Society Ltd, hereafter referred to as Craol, policy is designed to ensure the principal of academic integrity in Craol QQI modules and sets out how Trainers should deal with suspected plagiarism. Plagiarism is the reproduction, in all or part, of work prepared without giving recognition to the original source.

#### 2 Scope

This policy is aimed at Craol trainers, learners, and all external interested parties

#### **3 Date of Issue**

This policy was implemented on April 2008 and reviewed on September 2022. It is subject to annual review

#### 4 Aims of Craol Policy and Procedure regarding plagiarism

This policy sets out the assessment process and the procedures for dealing with plagiarism.

#### **4.1Assessment Process**

Each piece of work (assignment, project etc.) is first assessed by the Course Trainer according to the assessment brief and accompanying marking scheme. The Learner will be notified of the provisional mark and can discuss this with the trainer at this time. After discussions, the piece of work, along with the provisional marks is forwarded to the Craol QQI Coordinator

At the end of the course, an internal verification is carried out by the Craol Project Coordinator on the assessment process to ensure that procedures were adhered to & checking any errors in linking marks to Learners.

An external authenticator, appointed by Craol, then selects and checks a representative sample of work and marks across several courses to ensure that fairness and consistency in the use of the marking scheme was applied.

A Craol QQI Results Approval Panel reviews the final marks of all Learners and recommends to QQI for submission.

The learner is then notified of the final mark for the module/award and the details are provided to QQI for certification of the Learner.

#### **4.2 APPEALS – See appeals Policy**

Learners are entitled to appeal their results to QQI. The appeal must be in writing and must be within 14 days of the issue of the statement of results. All appeals must be made through the Craol Centre. Please contact qqi@craol.ie or 0858140106 to make an appeal. Each appeal is subject to a fee of E20. This fee will be reimbursed if the result is favourably adjusted.

## 4.3 PLAGIARISM

Plagiarism happens when a learner presents other people's writing, words, or ideas as their own. To avoid plagiarism learners must reference the source of their work. Keep in mind the following points

- 1. Any source, published or unpublished, should not be copied without a proper. acknowledgment.
- 2. Copying a written source with only minor changes should be acknowledged.
- 3. Learners cannot submit somebody else's work as their own. This includes books, articles, research, articles, research papers, published or unpublished.
- 4. Any information taken from a website must be acknowledged.
- 5. When submitting work, learners will be asked to sign an authentication statement, confirming that the work is entirely their own.

## 4.4 PROCEDURE FOR DEALING WITH PLAGIARISM

- 1. If a Trainer suspects that plagiarism has occurred, they should inform the learner of their concern.
- 2. The Craol QQI coordinator should also be informed. The work should be returned to the learner The learner, if they so wish, can have their work reviewed by another Craol QQI Trainer.
- 3. If plagiarism is confirmed, it will be recorded on the student's file.
- 4. The student will be asked to re-submit their work

PLEASE NOTE: On Submission of work, you will be asked to confirm:

That you have a clear understanding of the Craol QQI Policy and Procedures on Appeals & Plagiarism.

That you have kept an additional copy for personal use/in the event of back up copy being required. That the work is entirely your own except where referenced as being otherwise.

#### Submission of Assessment Material

DON'T FORGET THAT EACH PIECE OF ASSESSMENT MATERIAL NEEDS A "RECORD OF RECEIPT OF MATERIAL FOR ASSESSMENT"

Learners must present evidence of relevant research and sources including references.

All Project Material: The final project should be saved as: Written: Word File, if Audio: MP3 or Audio-visual: MP4.

## PLEASE NOTE THE FOLLOWING:

On Submission you will be asked to confirm that:

- 1 You have a clear understanding of the Craol QQI Policy and Procedures on Appeals & Plagiarism
- 2 You have kept an additional copy for personal use or if a backup copy is required.
- 3 That the work is entirely your own except where referenced as being otherwise.



## **Craol Protection of Enrolled Learners Policy**

#### 1. Introduction

The 2012 Education Act states that Protection of Enrolled Learner arrangements are put in place for programmes which have a duration of three months or more and for which fees are paid. Craol Community Radio Forum of Ireland Society Ltd, (hereafter referred to as Craol), provides modules that are less than three months in duration, and do not always involve fees. However, in accordance with the spirit of the Education Act Craol will seek to ensure that learners are facilitated in completing their modules.

#### 2. Scope

This policy is written for the Craol Coordination Committee, Craol Academic Committee, trainers, administration staff, Craol learners and any external parties who have paid for training for their members.

#### 3. Date of Issue

This policy was issued on April 2008 and will be reviewed annually or in accordance with any changes in legislation regarding learners.

#### 4. Aims of Policy

- 4.1 It is the responsibility of Craol, as a training provider, to ensure that all learners are enabled to complete their training and achieve the award associated with their module. This policy sets out how Craol, as a provider of education and training, will fulfil their legal obligation to learners in accordance with the 2012 Education Act and QQI guidelines regarding protection of enrolled learners. Craol will seek to ensure that:
  - 4.1.1 Learners are provided with adequate and accurate information about the module that they wish to complete and about the protection in place for them in the event that the module ceases prior to their completion.
  - 4.1.2 Learners have the opportunity to complete a module leading to an award
  - 4.1.3 Learners or institutions who have paid for Craol training will be refunded any moneys paid in the event that a module cannot be completed due to the following circumstances:
  - a. Lack of qualified registered Craol trainers, e.g., a trainer becoming ill
  - b. Lack of suitable training venues, e.g., damage to a training venue
  - c. Lack of suitable equipment, e.g., damage or shortage of suitable equipment
  - d. The organization ceasing to exist.

#### 5. Craol initiatives in the case of modules being disrupted

In the case of a trainer becoming ill or being unable to work due to personal circumstances Craol will provide an alternative trainer from the Craol data base of registered qualified trainers.

In the case of equipment being unsuitable or damaged, equipment may be sourced from another Craol station.

In the case of a venue being unsuitable, damaged in inaccessible or a new venue will be sourced.



## **Craol Language Policy for non-English speaking Learners**

#### 1. Introduction

Craol Community Radio Forum of Ireland Society Ltd, (hereafter referred to as Craol), is committed to the ethos of 'everybody's right to communicate.' Craol actively seeks to include all members of society regardless of nationality, ethnicity, religious persuasion, social background, disability, age or gender. This ethos also applies to Craol QQI accredited training.

#### 2. Scope

This policy is for Craol trainers, non-English speaking learners, Craol CCC, Craol Training and Quality Assurance sub-committee, Craol Academic Committee other relevant sub-committees and interested external parties.

#### 3. Purpose

The Craol Language Policy for non-English speaking learners is developed to ensure that learners are facilitated as much as possible by Craol in completing QQI accredited training and are given assistance where possible.

#### 4. Date of Issue

This policy was issued on September 2022 and will be reviewed annually or in accordance with changes in legislation.

#### 5. Aims of Policy

Craol QQI accredited training is aimed at all members of the community. In the case that English is not the first language of a trainee this policy sets out the steps the organization may take to facilitate their training, where possible.

- 1.1 Non-English-speaking trainees will have access to a CEFR assessment which will be carried out by a qualified Craol trainer. (CEFR assessment is included at the bottom of this policy)
- 1.2 Trainees who are assessed at over A2 according to the CEFR and who feel confident to complete a Craol module will be able to do so.

		A1	A2	B1	B2	C1	C2
U N D E R S T	Listening	I can recognise familiar words and very basic phrases concerning myself, my family and immediate concrete surroundings when people speak slowly and clearly.	I can understand phrases and the highest frequency vocabulary related to areas of most immediate personal relevance (e.g. very basic personal and family information, shopping, local area, employment). I can catch the main point in short, clear, simple messages and announcements.	I can understand the main points of clear standard speech on familiar matters regularly encountered in work, school, leisure, etc. I can understand the main point of many radio or TV programmes on current affairs or topics of personal or professional interest when the delivery is relatively slow and clear.	I can understand extended speech and lectures and follow even complex lines of argument provided the topic is reasonably familiar. I can understand most TV news and current affairs programmes. I can understand the majority of films in standard dialect.	I can understand extended speech even when it is not clearly structured and when relationships are only implied and not signalled explicitly. I can understand television programmes and films without too much effort.	I have no difficulty in understanding any kind of spoken language, whether live or broadcast, even when delivered at fast native speed, provided I have some time to get familiar with the accent.
A N D I N G	Reading	I can understand familiar names, words and very simple sentences, for example on notices and posters or in catalogues.	I can read very short, simple texts. I can find specific, predictable information in simple everyday material such as advertisements, prospectuses, menus and timetables and I can understand short simple personal letters.	I can understand texts that consist mainly of high frequency everyday or job-related language. I can understand the description of events, feelings and wishes in personal letters.	I can read articles and reports concerned with contemporary problems in which the writers adopt particular attitudes or viewpoints. I can understand contemporary literary prose.	I can understand long and complex factual and literary texts, appreciating distinctions of style. I can understand specialised articles and longer technical instructions, even when they do not relate to my field.	I can read with ease virtually all forms of the written language, including abstract, structurally or linguistically complex texts such as manuals, specialised articles and literary works.
S P E A	Spoken Interaction	I can interact in a simple way provided the other person is prepared to repeat or rephrase things at a slower rate of speech and help me formulate what I'm trying to say. I can ask and answer simple questions in areas of immediate need or on very familiar topics.	I can communicate in simple and routine tasks requiring a simple and direct exchange of information on familiar topics and activities. I can handle very short social exchanges, even though I can't usually understand enough to keep the conversation going myself.	I can deal with most situations likely to arise whilst travelling in an area where the language is spoken. I can enter unprepared into conversation on topics that are familiar, of personal interest or pertinent to everyday life (e.g. family, hobbies, work, travel and current events).	I can interact with a degree of fluency and spontaneity that makes regular interaction with native speakers quite possible. I can take an active part in discussion in familiar contexts, accounting for and sustaining my views.	I can express myself fluently and spontaneously without much obvious searching for expressions. I can use language flexibly and effectively for social and professional purposes. I can formulate ideas and opinions with precision and relate my contribution skilfully to those of other speakers.	I can take part effortlessly in any conversation or discussion and have a good familiarity with idiomatic expressions and colloquialisms. I can express myself fluently and convey finer shades of meaning precisely. If I do have a problem I can backtrack and restructure around the difficulty so smoothly that other people are hardly aware of it.
K I N G	Spoken Production	I can use simple phrases and sentences to describe where I live and people I know.	I can use a series of phrases and sentences to describe in simple terms my family and other people, living conditions, my educational background and my present or most recent job.	I can connect phrases in a simple way in order to describe experiences and events, my dreams, hopes and ambitions. I can briefly give reasons and explanations for opinions and plans. I can narrate a story or relate the plot of a book or film and describe my reactions.	I can present clear, detailed descriptions on a wide range of subjects related to my field of interest. I can explain a viewpoint on a topical issue giving the advantages and disadvantages of various options.	I can present clear, detailed descriptions of complex subjects integrating sub-themes, developing particular points and rounding off with an appropriate conclusion.	I can present a clear, smoothly-flowing description or argument in a style appropriate to the context and with an effective logical structure which helps the recipient to notice and remember significant points.
W R I T I N G	Writing	I can write a short, simple postcard, for example sending holiday greetings. I can fill in forms with personal details, for example entering my name, nationality and address on a hotel registration form.	I can write short, simple notes and messages relating to matters in areas of immediate needs. I can write a very simple personal letter, for example thanking someone for something.	I can write simple counected text on topics which are familiar or of personal interest. I can write personal letters describing experiences and impressions.	I can write clear, detailed text on a wide range of subjects related to my interests. I can write an essay or report, passing on information or giving reasons in support of or against a particular point of view. I can write letters highlighting the personal significance of events and experiences.	I can express myself in clear, well- structured text, expressing points of view at some length. I can write about complex subjects in a letter, an essay or a report, underlining what I consider to be the salient issues. I can select style appropriate to the reader in mind.	I can write clear, smoothly-flowing text in an appropriate style. I can write complex letters, reports or articles which present a case with an effective logical structure which helps the recipient to notice and remember significant points. I can write summaries and reviews of professional or literary works.



## **Privacy Statement**

#### Introduction

This Privacy Notice sets out the ways in which Craol Community Radio Forum of Ireland Society Ltd, hereafter referred to as Craol, collects, uses, and processes your personal information 'data, in connection with our business. It sets out the rights you have to access or change your personal data. Craol endeavours to take steps to use your personal information only in ways that are compatible with GDPR and this Privacy Statement.

The following applies to any personal data collected by the organisation. Data will be:

- Obtained and processed fairly
- Kept for only specified and lawful purposes
- Processed in ways compatible with the purposes for which it was given to the organisation
- Kept safely and securely
- Kept up to date and accurately
- Adequate, relevant and not excessive
- Kept for no longer than is necessary for the specified purpose or purposes
- Be freely accessible on request

#### Information we collect and why we collect it.

We collect personal information from you when you enquire about any of our activities, contact us for information, submit information by phone, text, in writing, by email or via our website or social media platforms. This information may include your, title, name, address, email address and telephone numbers. Copies of email correspondence and replies to said correspondence are retained on our server. We may also request your e-mail address or mailing address for the purposes of feedback, conducting a survey or providing information about Craol events. In addition, we will not send you e-mails that you have not agreed to receive. If you do not wish to receive further updates, you can opt-out by unsubscribing.

Every computer connected to the Internet is given a domain name and a set of numbers that serve as that computer's "Internet Protocol" or IP address. When a visitor requests a page on Craol's website our web server automatically recognize that visitor's domain name and IP address. The domain name and IP address reveal nothing personal about you other than the IP address from which you have accessed our site. We use this information to examine our traffic in aggregate, but do not collect and evaluate this information for individuals.

#### Analytics

#### Who we share your data with

From time to time we may share anonymous data with 3rd parties for training or broadcast license applications. You will be informed if we share your personal data with a third party if

it applies to the service you signed up for and we promise not to share your personal data with any other third parties or marketing companies if you have not consented to do so.

Craol may share aggregate information about our users to third parties but will not share any personally identifiable information about you without your expressed consent. The Craol website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements or how they treat information they obtain.

#### Cookies

We use cookies to ensure that you get the most out of our website. Cookies are small amounts of information in the form of text files which we store on the device you use to access our website. A cookie cannot read data off your hard disk or read cookie files created by other sites. Cookies do not damage your system. We use cookies to identify which areas of the Craol website that you have visited or customized, so that in time we may provide a better and more personalized experience for you.

If you do not wish for cookies to be installed on your device, you can change the settings on your browser or device to reject cookies. For more information about how to reject cookies using your internet browser settings please consult the "Help" section of your internet browser (or alternatively visit <u>http://www.aboutcookies.org</u> or <u>www.allaboutcookies.org</u>. Please note that, if you do set your Internet browser to reject cookies, you may not be able to access all of the functions of the website.

#### **Contact forms**

Our website may contain content and links to other sites that are operated by third parties that may also operate cookies. We don't control these third-party sites or cookies and this Privacy Notice does not apply to them. Please consult the terms and conditions and Privacy Notice of the relevant third-party site to find out how that site collects and uses your information and to establish whether and for what purpose they use cookies.

If you leave a comment on our site, you may opt-in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

If you have an account and you log in to this site, we will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

#### Media

If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors to the website can download and extract any location data from images on the website.

#### Embedded content from other websites

Articles on this site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracing your interaction with the embedded content if you have an account and are logged in to that website.

When you log in, we will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year. If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed. If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just edited. It expires after 1 day.

#### How long we retain your data

If you leave a comment, the comment and its metadata are retained indefinitely. This is so we can recognise and approve any follow-up comments automatically instead of holding them in a moderation queue. For users that register on our website (if any), we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

#### What rights you have over your data

If you have an account on this site, or have left comments, you can request to receive an exported file of the personal data we hold about you, including any data you have provided to us. You can also request that we erase any personal data we hold about you. This does not include any data we are obliged to keep for administrative, legal, or security purposes.

#### Where we send your data

Visitor comments may be checked through an automated spam detection service.

#### Your contact information

If you have any queries on data protection, please email <u>dataprotection@craol.ie</u>

#### **Additional information**

If you would like to request your data, please use our form which can be found here.

#### How we protect your data

Access to any personal data that we collect, is password protected

#### What data breach procedures we have in place

Data breach procedures can be found in our Data Protection Policy

#### Security

Craol uses all precautions possible to keep the information disclosed to us secure. This includes the use of password protection and regular maintenance of our servers. We do not sell, rent, or

otherwise give your e-mail address to a third-party without your consent. We will retain your information for as long as is necessary to provide you with the services that you have requested from us or for as long as we reasonably require to retain the information for our lawful business purposes, such as for the purposes of exercising our legal rights or where we are permitted to do. We operate a Data Retention Policy and look to find ways to reduce the amount of information we hold about you and the length of time that we need to keep it. For example, we maintain a suppression list of email addresses of individuals who no longer wish to be contacted by us.

## You can also play a part in keeping your information safe by:

- Choosing a strong account password and changing it regularly.
- Using different passwords for different online accounts.
- Keeping your passwords confidential and not sharing your login with others.
- Making sure you log out of the website each time you have finished using it, especially in the case of using a shared computer.
- Contacting Craol immediately if you know or suspect that your account has been compromised, or if someone has accessed your account without your permission.
- Keeping your devices protected by using the latest version of your operating system and maintaining any necessary anti-virus software.
- Being vigilant to any fraudulent emails that may appear to be from us. Any emails that we send will come from an email address ending in @craol.ie.
- Storing all private, sensitive and confidential documents in a secure environment such as a lockable cabinet or non-portable safe.

#### Your Consent to This Agreement

By using our website you consent to the collection and use of information by us as specified above. If we decide to change our privacy policy, we will post those changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it.

Craol has procedures in place to ensure that data subjects can exercise their rights under Data Protection legislation. To make an access request, or if you would like us to correct, update or delete any information we hold on you, from our records please submit your request in writing to <u>dataprotection@craol.ie</u>. Please ensure that you describe the records you seek in the greatest detail possible to enable us to identify the relevant records.