

Policy number	7.4
Policy name:	Consumer Protection Policy
Version Number:	2
Developed by:	Chrissy Moog
Policy status:	Approved
Date Approved:	29 th May 2020
Next Review due by:	29 th May 2021
Applicable to:	Customers, Students
Related Policies/Procedures:	Learner Complaints Procedure, Customer Complants Procedure, Learner Appeals Procedure
Equality and Diversity	Equality Impact assessment was undertaken for this policy.

REVISION HISTORY

Version	Date	Revision description/Summary of changes	Author
2	29/05/20	Edited summary table and added EIA	Chrissy Moog

1. Overview

Higher Rhythm is fully compliant with consumer protection law and at this point in time we charge individuals and organisations for the following services, across our whole organisation's range of activities:

- Recording Studio Services
- Advertising
- Courses
- Certificates (where course fees are waived or externally funded)

In relation to the above, we take the following approaches to assure customer satisfaction and protection:

Recording Studio Services

The client is fully involved in the process of producing a recording and can influence the process towards achieving a finished recorded product as a performer, and also by making suggestions to the engineer at mix-down. When a recorded product is completed to the customer's satisfaction, this constitutes 'sign off' and any additional studio time required to make further amendments is chargeable. Where a day or package rate is quoted and accepted by the customer, any additional time over the set number of hours / days appropriate to that agreement is also chargeable.

Advertising

The client is fully involved in the process of producing an advert, including script sign off and agreeing the finished creative in the case of radio adverts, and can influence the process at any time within the process towards achieving the finished product. When advertising content, media or creative product is completed to the customer's satisfaction, 'sign off' will be requested and any further amendments, which involve revisiting signed off stages, are chargeable. Where an advertising package rate is quoted and accepted by the customer, any additional requirements which result in exceeding the set number of opportunities to see / hear will also be chargeable.

Courses

We outline the content, structure and expected outcomes of any course to every participant before it commences, operating an EOI >APPLICATION >INTERVIEW > INDUCTION > PROGRAMME approach, whereby the INTERVIEW stage provides the opportunity to outline the details of a course, and for the customer / learner to be able to make a well-informed decision about enrolling on the course, in receipt of all necessary information.

The INDUCTION marks the start of a contract between Higher Rhythm and the learner / customer where expectations of both sides are detailed. Specifically, before offering a place, we will make clear:

- The course content and structure (although we reserve the right to make reasonable changes to course content in line with such things as laws, regulations or relevant industry trends and shifts which may occur mid-course, and where we view these

changes necessary, whereupon we will issue information to the learner / customer about the changes in a reasonable time frame)

- The total costs of the course including tuition fees (and any additional costs associated with course delivery)
- Our terms and conditions, including any rules and regulations that learners / customers are bound by .
- Any changes since the learner applied
- Complaints handling and cancellation rights.

Certificates

Where course fees are waived or externally funded, we may make a charge for course certificates. Full time workers may be eligible to pay the full cost of a certificate, and we operate discounted rates for some certificates, to unwaged learners. In all cases, certificates will be issued as soon as possible following the nearest moderation date after the end of a course. Collection in person is preferred but we may also mail certificates out.

2. How consumer law applies to our terms and conditions

We make every effort to assure that our terms and conditions, and any rules and regulations, are clear and transparent. If for any reason a learner / customer requires further clarification, upon request, we will provide any appropriate information available to us in order to attempt to provide clarity. Policies relevant to being a learning / student at Higher Rhythm (including FE and HE) are available on our website at <https://www.higherrhythm.co.uk/public-policies/> in order to make our policies / terms and conditions clear to anyone before they engage with our services.

We aim to strike a fair balance between our rights and obligations and those of our learners / customers. If a learner / customer believes that any of our practices or policies are unfair, or, could simply be improved, a complaint can be made using our complaints procedure (our customer complaints policy is displayed in reception area and a copy of which can also be obtained from reception office) or, in the case of suggested improvements, a suggestion / feedback box is also displayed in reception.

Our Learner Complaints Procedure, details how to raise a complaint as a learner and is available via our website at the same URL as above, or a copy can be requested from reception office. We maintain a Student Protection Plan, which details further practices and procedures around what HE learners can expect from us. We also refer HE learners to the following resource, which fully details rights as a student: <https://www.gov.uk/government/publications/higher-education-guide-to-consumer-rights-for-students>

3. How consumer laws applies to our complaint handling processes and practices

We make every effort to assure that our complaint handling processes and practices are clear and transparent. If for any reason a learner / customer requires further clarification, upon request, we will provide any further information available to us in order to attempt to provide clarity. Policies relevant to being a learning / student at Higher Rhythm (including FE

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and HE) are also available on our website at <https://www.higherrhythm.co.uk/public-policies/>

We will inform all FE and HE learners about our processes, including any right to escalate internally and to an external complaint scheme such as the Office of Independent Adjudicator.

Our staff, are aware of, have specific knowledge of and follow our complaint handling processes and practices so can provide initial guidance on how to approach complaints.

Appendix 1 – Equality Impact Assessment

Name of Proposal (policy/strategy/function/service being assessed)	Consumer Protection Policy
Those involved in assessment:	CEO, Quality and Media Services Manager
Is this a new proposal?	No
Date of Initial Screening	May 29, 2020

What are the aims, objectives?	To set out our Consumer Protection Policy
Who will benefit?	Staff, Students, Customers
Who are the main stakeholders?	Staff, Governing Board
What are the desired outcomes?	For clients to be aware about consumer protection policy
What factors could detract from the desired outcomes?	Non-awareness of this current policy.
What factors could continue to the desired outcomes?	Updated legislation
Who is responsible?	Quality and Media Services Manager
Have you consulted on the proposal? If so, with whom? If not, why not?	Yes, Governing Board.

Which protected characteristics could be affected and be disadvantaged by this proposal (please tick)	Yes	No
Age	<u>Consider:</u> Elderly, or young people	✓
Disability	<u>Consider:</u> Physical, visual aural impairment, Mental or learning difficulties	✓
Gender Reassignment	<u>Consider:</u> Transsexual people who propose to, are doing or have undergone a process of having their sex reassigned	✓
Marriage and Civil Partnership	<u>Consider:</u> Impact relevant to employment and/or training	✓
Pregnancy and maternity	<u>Consider:</u> Pregnancy related matter/illness or maternity leave related matter	✓
Race	<u>Consider:</u> Language and cultural factors, include Gypsy and Travellers group	✓
Religion and Belief	<u>Consider:</u> Practices of worship, religious or cultural observance, include non-belief	✓
Sex/Gender	<u>Consider:</u> Male and Female	✓
Sexual Orientation	<u>Consider:</u> Know or perceived orientation	✓

What information and evidence do you have about the groups that you have selected above?

NA

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Consider: Demographic data, performance information, recommendations of internal and external inspections and audits, complaints information, ethnicity data, audits, service user data, etc.

How might your proposal impact on the groups identified? For example, you may wish to consider what impact it may have on our stated goals: Improving Access, Reducing Social Inequalities, Developing Confidence, Developing skills, Supporting Vulnerable People

Examples of impact re given below:

- a) Planning a trip with the students to a location, which may have impact on people with limited mobility.
- b) Planning to extend access to studio without considering how the services may be accessed by people with limited mode of transportation.
- c) Redesign of a services that is used by people who may not have English as a first language, and may be excluded from normal communication routes.

Please list the positive and negative impacts you have identified in the summary table on the following page.

Summary	
Positive impacts (note the groups affected)	Negative impacts (note the groups affected)
N/A	N/A

Summarise the negative impacts for each group:

N/A

What consultation has taken place or is planned with each of the identified groups?

N/A

What was the outcome of the consultation undertaken?

N/A

What changes or actions do you propose to make or take as a result of research and/or consultation?

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Briefly describe the actions then please insert actions to be taken.

N/A

Will the planned changes to the proposal:

Please state Yes or No

Lower the negative impact?	N/A
Ensure that the negative impact is legal under anti-discriminatory law?	N/A
Provide an opportunity to promote equality, equal opportunity and improve relations i.e. a positive impact?	N/A

Taking into account the views of the groups consulted and the available evidence, please clearly state the risks associate with the proposal, weighed against the benefits.

N/A

What monitoring/evaluation/review systems have been put in place?

This policy, along with other policies, will be reviewed annually.

When will it be reviewed?

May 29, 2021

Date Review completed:	May 29, 2020
Signature:	Steven Mundin
Approved by:	Gwyn Ap Harri
Date Approved:	May 29, 2020