



# Learner Handbook

Working at Height Limited

**Date:** 07/11/2023

**Document No:** 5.9.TC.3.20

**Version No:** 1

**Approved by:** Adrian McMahon

# Working at Height Limited – Learner Handbook

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# Working at Height Limited – Learner Handbook

## Welcome

Thank you for reserving a place on a Working at Height Limited course. We hope you enjoy it and that it meets your expectations. Working at Height Limited are a [QQI](#) and [PHECC](#) Quality Assured Provider and to this end have implemented a Quality Assurance System. The sections relevant to you as a learner are outlined or referenced in this handbook. It is important that you read and comply with its arrangements.

By booking on the course, you are accepting the following Learning Agreement.

## Learning Agreement

We promise to:

- ② Accept you on courses in accordance with our [\(DOC No. 4.1.80\) Access, Transfer and Progression Policy and Procedure](#) and subject to you meeting the course prerequisites set out the course outline on the relevant course page on our website [www.workingatheight.ie](http://www.workingatheight.ie).
- ② Notify you at the earliest opportunity of any re-scheduling, postponement or cancellation of classes. We will provide a suitable alternative within 5 working days or a refund.
- ② Protect your personal data and inform you of information retained on request and allow you to request changes in accordance with our [\(DOC No. 4.1.20\) Data Protection Policy](#)
- ② Treat learners equally, fairly and with dignity and respect and recognise diversity in accordance with our [\(DOC No. 4.1.2\) Equality & Diversity Policy & Procedure](#).
- ② Provide a safe learning environment in accordance with the Health & Safety Policy and Procedure.
- ② Start courses and finish courses on time. We will inform you as early as possible on any schedule changes.
- ② Deliver courses to the highest standard possible by competent trainers. If you are not satisfied you can complain in accordance with our [\(DOC No. 4.1.3\) Complaints Policy & Procedure](#).
- ② Provide you with course notes and resources so that you can complete the course successfully.
- ② Assess you fairly in accordance with our [DOC No. 4.1.5 Assessment of Learners Policy and Procedure](#).
- ② Allow you to appeal if you are not satisfied with your result in accordance with our [\(DOC No. 4.1.32\) Academic Appeals Policy & Procedure](#).

**As a learner we expect that you:**

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- ② Attend all training sessions punctually unless agreed otherwise with the trainer.
- ② Treat learners equally, fairly and with dignity and respect and recognise diversity.
- ② Treat equipment and buildings with care.
- ② Contribute and participate constructively in the training sessions.
- ② Submit any assignments and complete and course work within the deadline unless agreed otherwise with the trainer.
- ② Ensure that any assignments and course work are your own and confirm this on your assignment.
- ② Comply with the course Examination rules.
- ② Abide by any fair disciplinary actions set by the trainer and/or Working at Height Limited.
- ② Pay for the course in full within the credit terms.

## Introduction to Working at Height Limited

Working at Height Limited specialises in the delivery of Instructor Courses including Rope Access, Technical Rescue, Manual Handling, Cardiac First Responder (CFR), Abrasive Wheels and Fire Safety. It was established in 2016 by Adrian McMahon.

## Our values

Our values are Integrity and Professionality. We aim to achieve this by ensuring that we advise learners honestly and professionally in how they can progress as trainers and instructors.

## Mission Statement

Working at Height Limited's goal is to become regarded as the premier provider of accredited Instructor Training courses. These include courses leading to both PHECC and QQI Awards.

Our mission is to ensure that our learners leave our courses being both confident and competent in the skills that we have trained them in.

We see our relationship with our customers as a partnership and we want them to become successful in their roles.

We endeavour to achieve this mission through the delivery of our courses in a fun and focussed and inclusive manner.

We endeavour to deliver our programmes using the latest best practise, technology and innovation whilst meeting our Awards Bodies' learning outcomes.

Working at Height Limited is committed to encouraging and enabling adults to achieve their learning goals through quality training with appropriate support, thus promoting equal opportunities and widening participation.

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## The Learner Journey

Learners can apply online through the course page on our website: [www.workingatheight.ie](http://www.workingatheight.ie)

Learners must ensure that they meet the course prerequisites which are outlined on the course page.

Learners can apply for Recognition of Prior Learning in accordance with the Recognition of Prior Learning Procedure outlined below.

At least a week prior to the course commencement Learners will receive a course confirmation email detailing joining instructions and any requirements to attend and successfully complete the course.

Learners must complete the Delegate Booking form to confirm their attendance, that they have read this Learner Handbook and agree to the Learning Agreement. They must highlight any requests for Reasonable Accommodation on this form.

This Learner Handbook will also outline the rules and requirements for assessments and examinations.

On arrival on the course learners will be required to complete the Attendance Sheet and sign the Learner Agreement.

The obligations on both Working at Height Limited and Learners will be outlined during the Learner Induction module.

This Learner Induction will also outline support available to the learners during and after the course. All assessments, assignments and examinations will be explained at this point.

Learners will then receive an email with the course resources which will include the assignment briefs and templates and assessment requirements.

Learners will be assessed in the classroom in accordance with the Assessment & Examination Rules outlined below.

On completion of the course, learners will receive an email containing feedback on their assessment and a link to an Evaluation Form which must be completed.

## Academic and IT Support

Learners can contact the trainer directly on their email which will be provided during course induction. They can also contact administration staff in the office by email, [academy@workingatheight.ie](mailto:academy@workingatheight.ie). Normal office hours are 9 am to 5.30 Irish time pm. Both the office and the trainer can be contacted outside these hours if the matter is urgent.

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## Breaches of Discipline

Any act or omission, which affects adversely the rights of any learner/staff member or which disrupts the orderly and responsible conduct of any company activity, or which violates the Learning Agreement or incidents of misconduct, shall constitute a breach of discipline. Disciplinary action may result in a suspension for a fixed period or permanent expulsion from the course. Gross misconduct will result in immediate expulsion from the course. Gross misconduct could include physical or verbal abuse of another learner or trainer or academic misconduct.

## Academic Integrity Policy

It is Working at Height Limited's Policy to assure the academic integrity of the Awards that they are responsible for. Working at Height Limited take any breach of academic integrity very seriously.

It is a core quality requirement in training that all assessment is conducted in a professional manner and that it is fair and consistent. The primary aim of assessment is to determine whether a programme's learning outcomes have been achieved.

Academic misconduct occurs when the learner behaves in a way which undermines the integrity of the assessment (e.g., by cheating in an exam, engaging in plagiarism, buying assessment materials or services from a third party). Therefore, academic misconduct can be regarded as any action which dishonestly uses information to gain an academic award or academic credit.

Plagiarism may be defined as: *the practice of taking someone else's work or ideas and passing them off as one's own.* (OED)

Since 2019, it has been against the law to facilitate cheating and QQI has provided guidance for learners and educators as this is a continuing area of concern across all education and training providers and regulators.

## Academic Integrity Procedure

### 1. Purpose

The purpose of this procedure is to outline how Working at Height Limited protects the underlying value of the awards it trains for by the prevention of cheating and other forms of academic misconduct.

Procedures in relation to prevention, monitoring and control of potential cases of academic misconduct are included in Sections 6 and 7 of this section.

### 2. Scope

This policy relates to academic integrity and related practices which are intended to prevent plagiarism within Working at Height Limited's teaching, learning and assessment activities across its programmes leading to accredited awards.

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## 3. Responsibility

The Head of Training & Quality is responsible for ensuring that this policy is adhered to by all staff and any collaborative partners, e.g. contracted trainers.

The Academic Board has oversight of this policy in relation to academic and regulatory standards.

The Management Board has oversight of this policy in relation to training delivery, resources and supports.

## 4. Records

Risk Assessment Risk

Register

## 5. Procedure

### 5.1 Risks

At its most basic level, plagiarism is the practice of using or copying someone else's ideas or work and pretending that the learner or presenter thought of it or created it in the first place.

Plagiarism may include:

- ① Copying or paraphrasing without acknowledging the source - failure to properly reference sources can give rise to a charge of plagiarism.
- ① Copying and pasting from the internet without proper referencing - this can be both deliberate or accidental (e.g., failing to note the source of a quote or piece of information included within an assessment).
- ① Deliberate collaboration or collusion - a learner works with others
  - ① to present the same content as the learner's original work.
- ① Recycling – a learner reuses or resubmits their previous work. This can occur when assessments are recycled and presented as new, original work.
- ① Commercial essay-writing/cheating services – where a learner uses professional essay-writing or similar paid-for services and presents this content as their own work. These services are widely advertised across the internet and such academic malpractice occurs when the learner pays for essay-writing or other cheating services.

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## 5.2 Preventative Actions

On a practical level, a strong trainer-learner relationship can help to provide early warning of potential risks of academic misconduct. Therefore, Working at Height Limited strives for open and supportive relationships between trainers and learners to help prevent the risk of academic misconduct.

Preventative measures include:

- ① Learner supports - include guidance on the risks of academic misconduct and how learners may avoid plagiarism. Examples include guidance from trainers during induction; study and academic writing skills to help support learners in getting to grips with their training course; Harvard referencing skills, etc.
- ② Use of formative assessment – this helps learners to develop research and academic writing skills, with constructive feedback from trainers to support these skills and identify potential risks (e.g., failing to adequately reference materials).
- ③ Assessment design - aim to develop materials and assessment instruments that are the less susceptible to cheating methods.
- ④ Exam supervision and administration – monitor invigilation experiences and remain vigilant in monitoring the risk of cheating.
- ⑤ Governance via the Academic Board should take a proactive approach to the risk of academic misconduct, reviewing feedback from trainers and assessors and providing guidance to trainers and administrators.
- ⑥ Support for trainers and assessors – use of CPD training and practical workshops.
- ⑦ Using technology tools (e.g., Turnitin) - helps to detect plagiarism plus provide training for staff on how to interpret the results of these interventions.
- ⑧ Raising learners' awareness of the sanctions for academic misconduct and maintaining records of such cases to assist in prevention.

The Academic Board will work closely with the Head of Training & Quality in maintaining and updating the Risk Register in relation to academic misconduct risks.



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## Programme Access, Transfer and Progression Policy

Working at Height Limited operates an open access and admissions policy for learners who meet the programme entry requirements. Entry details are specified in:

- ① Programme validation documents approved by PHECC/QQI, as appropriate.
- ② The course details page on Working at Height Limited's website [www.workingatheight.ie/academy](http://www.workingatheight.ie/academy) which includes clear details of course aims, objectives, certification basis, course resources and minimum entry requirements.

There is a fair and consistent approach in providing information on courses, including:

- ① Name of Awarding Body for certified courses (e.g., QQI, PHECC).
- ② Component award specification.
- ③ National Framework of Qualifications award level, e.g., Level 6.
- ④ Course delivery method (e.g., online and/or classroom; IT and practical skill requirements).
- ⑤ Entry requirements including level of English on the [Common European Framework of Reference \(CEFR\)](#). A level of B2 proficiency is required.
- ⑥ Working at Height Limited welcomes a diverse range of applicants in line with its Equality and Diversity Policy and Procedure, where reasonably practicable, Working at Height Limited will accommodate learners with special or specific needs.

Working at Height Limited reserves the right to refuse admission to a programme if the learner is deemed to be unsuitable and will inform applicants of the reason for doing so. Unsuccessful applicants can appeal this decision through the Academic Appeals Policy and Procedure.

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## **Transfer**

Successful completion of a component award with QQI will allow the learner to transfer to a full QQI Major award using the credit gained from the original component. Guidance on possible transfer is available from the Head of Training & Quality.

Generally, Working at Height Limited's courses are single component modules so transfer may not be relevant for most learners, although a component award may be used as credit with another training course outside Working at Height Limited

## **Progression**

As instructor training specialists, many of Working at Height Limited's courses lead to progression opportunities and details of these progression routes are shown on Working at Height Limited's website, e.g. L6 Training Delivery & Evaluation may lead to progression to L6 Manual Handling Instructor.

Other progression opportunities include HE courses, e.g., L7/L8 Healthcare courses or L7 Occupational Health & Safety courses.

## **Recognition of Prior Learning Policy & Procedure**

### **Recognition of Prior Learning Policy**

It is the policy of Working at Height Limited to provide Recognition of Prior Learning (RPL) to learners where appropriate. Working at Height Limited recognises that many adult learners have prior learning, both formal and informal.

Working at Height Limited is committed to supporting lifelong learning and prior learning and/or relevant experience may be considered as part of the course admissions process. Learners may wish to have this considered for the purposes of receiving awards and for access to, or exemptions from, programme requirements. To facilitate this Working at Height Limited have implemented a process for providing RPL.

Learners can gain additional information and recognition of any educational programmes and certified training complete outside of Ireland through the National Academic Recognition Information Centre (NARIC) and the National Europass Centre.

Learners are assessed in a fair and consistent manner and Working at Height Limited will ensure that all applications for RPL are consistent with quality assurance policy and procedures.

Working at Height Limited will ensure each application for RPL is judged with fairness and

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transparency. It will also ensure that each application is judged to have achieved the relevant standard and ensure accuracy, validity and consistency.

## Recognition of Prior Learning Procedure

### 1. Purpose

The purpose of this procedure is to recognize and facilitate Recognition of Prior Learning.

### 2. Scope

This policy relates to all requests for Recognition of Prior Learning for Programmes within Working at Height Limited leading to an Award by PHECC or QQI.

### 3. Responsibility

The Head of Training and Quality is responsible for considering and approving all applications for Recognition of Prior Learning.

The Academic Board has oversight of this policy.

The Management Board has oversight of this policy in relation to business strategy and training resources.

### 4. Records

RPL Application form

### 5. Procedure

Learners wishing to avail of RPL are required to complete the RPL Application Form which requires details of any prior learning or relevant experience. The form is designed to help assess how RPL may support entry to a course or identify a credit or exemption from a unit within a programme. Learners are required to provide evidence as to how they have already attained the academic credits/practical competencies for the course. Learners return the RPL Application Form along with supporting evidence, e.g. CV and a supporting statement, course schedules, award certificates.

The Head of Training & Quality will respond by email or phone to any queries that the learner might have in this area. The RPL Application will be reviewed by the Head of Training & Quality who will respond by email or phone to any queries that the learner might have. The Head of Training & Quality will provide the learner with feedback on items received and options available to fulfil any outstanding RPL requirements, further assessing these as necessary.

The Head of Training & Quality will advise the applicant on whether they were successful or not. If unsuccessful the applicant can appeal the decision through the Appeals Procedure as part of the assessment process.

In addition, a learner availing of RPL may need to attend training days as they would only

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qualify for exemption from the relevant assessment component.

The Head of Training & Quality will carry out any further face to face assessments required: for example, skills demonstration or written test. The Internal Verifier will verify that there is evidence available for all credits awarded. Preliminary results will be emailed to learners, allowing them to appeal these results prior to the Results Approval Panel.

## Examinations & Assessments

- ① The invigilator/ trainer will inform learners of the Examination regulations before commencement of the exam. This includes the following rules:
  - It is a closed book examination and that learners are not allowed consult with other learners or look at other learners' answers.
  - Learners are not allowed to leave the examination room and return to the examination room without a genuine reason and they will need to be supervised during their absence.
  - Learners are required to put their name and examination date on their answer sheet.
  - Learners are instructed not to read the examination questions until told to do so.
  - Learners are allowed one hour to complete the examination.
  - Learners are not allowed to leave the exam until 30 minutes after the commencement of the Exam.
  - Learners will be given a 15-minute warning on time remaining.
  - Learners must remain seated until all answers sheets are submitted from their designed email and receipt has been confirmed.
  - Learners must always comply with invigilators' instructions. This includes instructions to leave the examination if requested.
- ② Prior to the examination the invigilator will ensure that learners' desk surfaces can be viewed by them and that they are separated so that other learners cannot see their answers.
- ③ Reasonable accommodation is made for learners with disabilities or other issues covered under the nine grounds for discrimination. This can include a reading out questions for learners that may have literacy issues. This will be carried out on a one-to-one basis to ensure that other learners are not disturbed or cannot hear the answers. This may also include allowing learners to perform skills from a seated or table height position if necessary. This will be noted on the Assessment Sheet.
- ④ For any assessments carried out via video conferencing, learners are required to place another camera behind them to ensure that they can be adequately supervised.
- ⑤ For QQI assessments, skills will be videoed/ photographed for evidence. Learners will be informed of this fact. This recorded evidence is stored securely in a OneDrive folder.
- ⑥ Trainers are responsible for securely storing all exam answers and
- ⑦ marking sheets until they are returned to Working at Height Limited's office by email.

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- ② Learners are required to keep their own copy of assignments submitted.
- ② Learners are required to submit completed assignments within the agreed deadline from their designated email. They will receive confirmation of receipt of same.

## **Academic Appeals Policy and Procedure**

### **Academic Appeals Policy**

It is Working at Height Limited's Policy that learners are assessed in a fair and credible manner.

Working at Height Limited will facilitate learners appeal academic decisions and results in a timely and efficient manner.

### **Academic Appeals Procedure**

#### **1. Purpose**

The Academic Appeals Procedure reinforces the fairness and consistency of the assessment process in order to ensure the overall integrity of the process.

Only approved results may be appealed by the learner so the Academic Appeals Procedure can only be invoked once the Results Approval Panel has approved preliminary results.

#### **2. Scope**

Working at Height Limited's Assessment Policy allows for an appeals process in relation to assessment results or any perceived irregularities or inequality during the assessment process leading to an Award.

#### **3. Responsibility**

The Academic Board is responsible for monitoring and approving this procedure.

#### **4. Records**

Appeals Form, Marking Sheet

#### **5. Procedure**

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## 5.1 Learner Information

All learners are made aware of their right to appeal the results of any assessment as part of the course induction and also in the Learner Handbook.

## 5.2 Appeals Process

The Academic Appeals Procedure operates as follows:

- ① Once the learner has received his/her preliminary results then these may be appealed within 14 days of notification.
- ② The learner completes the Appeals Form and sends this to either their trainer or the Head of Training & Quality.
- ③ A fee of €50 is payable by the learner in order to process the appeal. This fee is refundable in the event that the outcome of the appeal is successful.
- ④ Only assessment evidence previously presented by the learner may be considered for the purposes of the appeal. No new evidence may be submitted or considered.
- ⑤ The Head of Training & Quality forwards the Appeals Form and supporting assessment evidence (including marking sheets) to the Academic Board for review.
- ⑥ The Academic Board may engage the services of an external assessor to assist with its review if it considers this to be appropriate to maintain fairness and consistency within the specific circumstances of the appeal.
- ⑦ The Academic Board notifies the learner in writing of the outcome of the appeal within 14 days of its review meeting (which may be a virtual meeting). At the same time the Head of Training & Quality will be notified of the outcome of the appeal.
- ⑧ If the appeal by the learner is upheld, then the Head of Training & Quality is responsible for ensuring that the learner's result is amended prior to certification.

The Academic Board will formally minute the decisions in relation to the Academic Appeals Procedure at its next meeting and has the right to make observations and recommendations for corrective action in relation to such matters.

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## Complaints Policy & Procedure

### Complaints Policy

Working at Height Limited endeavors to provide a quality training and certification service through our Quality Management System. If our training or certification service falls below our customer's expectation, we will facilitate the customer in making a customer complaint. We will take all complaints seriously and to ensure they are dealt with in a timely and effective manner.

Feedback is an essential part of evaluating our systems and continuing this excellent service. We welcome complaints as they provide an indication of areas where we need to improve our practices. All complaints are carefully evaluated, in the strictest of confidence, and where necessary action plans are put in place to rectify the situation. All efforts are made to resolve the situation without further upset to any party. Learners, staff and stakeholders have the right to make a complaint about the service, should they be unsatisfied with their experience. No person is disadvantaged as a result of having lodged a complaint. Complaints can be made by following the steps outlined in the complaint's procedure. Each complaint is investigated in a timely manner. The subject of any complaint has the right to be informed of the complaint made against him or her and has the right to respond to any allegations made against them.

### Complaints Procedure

#### 1. Purpose

To ensure that all customer complaints are taken seriously and dealt with in a timely manner.

Feedback from learners, employers and other stakeholders is an essential part of how Working at Height Limited evaluates its training delivery and quality assurance.

Complaints are considered as part of customer feedback and are to be treated seriously as they can provide an opportunity to improve Working at Height Limited's services and internal procedures.

It should be noted that the Complaints Procedure covers all of Working at Height Limited's services but any issue arising from assessment is subject to the separate Academic Appeals procedure.

#### 2. Scope

All complaints related to courses leading to Awards from Learners and customers.

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Working at Height Limited endeavours to provide a quality training and certification process based around its quality assurance system.

All customer complaints are taken seriously and investigated in a timely and effective manner.

## 3. Responsibility

It is the responsibility of the trainer to make the learner aware of the process to making a complaint and to inform the Head of Training & Quality of any complaints.

It is the responsibility of the Head of Training & Quality to ensure that any complaints are fully dealt with and resolved.

The Management Board is responsible for monitoring and approving this procedure.

## 4. Records

Complaint Form

## 5. Procedure

### 5.1 Learner Information

All learners are made aware of the Complaints Procedure as part of their course induction, and they are also advised of this in the Learner Handbook. The aim is to make it as easy as possible for learners to raise any concerns or dissatisfaction with Working at Height Limited's services, training delivery or learner supports so that matters can be dealt with promptly and courteously.

### 3.2 Handling Complaints

Working at Height Limited welcomes feedback and if a learner or other interested party wishes to make a formal complaint then Working at Height Limited will facilitate this using the Complaints Procedure, as follows:

- ① A learner or other interested party may raise concerns in an informal manner with a trainer or other member of staff and these concerns must be dealt with promptly, with the Head of Training & Quality being notified of the issue and outcome.
- ② If a learner or other interested party wishes to make a formal complaint, then they must complete the (DOC No. 5.9.TC.3.21) Customer Complaints Form.
- ③ The Customer Complaints Form should be submitted to the Head of Training & Quality, using email or post.
- ④ The Head of Training & Quality will acknowledge receipt of the complaint within 24 hours, using email.
- ⑤ The Head of Training & Quality will then carry out an investigation to establish the facts of the case, gather relevant evidence, and consult with trainers and staff members as appropriate.
- ⑥ The Head of Training & Quality will issue a formal response in writing via email to the complainant within 5 working days from the date of receipt of the formal complaint, including a copy to interested parties where relevant.



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- ③ If further time is required to properly investigate the complaint, then this time limit may be extended provided that the complainant is notified of this within the 5 working days timeline.
- ③ Following the issue of the response, the Head of Training & Quality will contact the complainant to verify that the matter has been dealt with to their satisfaction. This must be done within 30 days from the issue of the response by Working at Height Limited.
- ③ All relevant correspondence will be saved to the Customer Complaints folder in the Act MIS.

The Quality Committee will review all formal complaints subject to this process, making recommendations to the Management Board as appropriate. Any complaints relating to Teaching and Learning must also be copied to the Academic Board for review and follow-up as appropriate.

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## Data Protection Policy and Procedure

Working at Height Limited takes the protection of personal data very seriously and are committed to protecting it at all times. Working at Height Limited operates the [www.workingatheight.ie](http://www.workingatheight.ie) website. We need to collect information and data on the individuals who use our services. This policy outlines how personal data will be processed\* in accordance with the General Data Protection Regulation (GDPR), the Data Protection Act Ireland 2018, Electronic Communication Regulation and other legislation.

There are three ways in which personal data can be collected:

1. directly from individuals
2. via our website
3. via cookies and other related technologies.

Information collected will primarily be used to manage membership subscriptions as well as provide end users with a personalized internet experience that delivers information, resources, and services that are most relevant and professionally helpful.

Working at Height Limited fully respects your right to privacy and will not collect any personal information about you on this website without your explicit permission (where applicable). Any personal information which you volunteer to us will be treated with the highest degree of security, integrity and confidentiality and will not be shared without your explicit consent.

By accessing our websites and availing of our services, you agree to this Privacy Policy and to be bound by our terms of use.

### What information do we collect and how is it used?

When you use our website to register for events or to maintain your membership subscription; the following information will be collected;

1. Names and email address(es)
2. home or work address
3. phone number(s)
4. profession/ job title/role
5. payment details
6. CPD credits for events attended or performed.
7. Competencies, certifications etc.
8. Other information as deemed necessary
9. Survey responses (where relevant).

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## Communication

It should be noted that the primary mode of most communication is email and most of the communication from Working at Height Limited shall be through this medium. Where required, other modes (e.g., communication via post/phone) will be considered. Certain communication will be required for the purpose of providing training etc. Other emails may advise you of upcoming events and training. To opt out of these emails and newsletters, click the "unsubscribe" link at the bottom of any email or e-newsletter from us.

We do not knowingly solicit data online from or market online to children under the age of 16. We do not collect special category data.

## Disclosures

All information you provide to us will be treated with strictest confidence in line with national and EU data protection laws, unless mandated by law or with your explicit consent, Working at Height Limited will not disclose any personal or personally identifiable information about you to a third party under any circumstances unless.

- ① disclosure reasonably necessary to perform a service or deliver a product or publication.
- ② you have given explicit consent
- ③ disclosure is permitted under this Privacy Policy;
- ④ disclosure is required by statute, regulation or court order
- ⑤ disclosure is in the good-faith belief that such action is necessary to:
  1. conform to legal requirements or comply with legal proceedings served on Working at Height Limited;
  2. protect and defend the legitimate rights of Working at Height Limited
  3. protect the personal safety of Working at Height Limited personnel or members of the public in urgent circumstances;
  4. enforce our Privacy Policy.

## Online Activity Tracking Using Cookies

Working at Height Limited track website usage by both anonymous visitors and registered users who interact with the Working at Height Limited website, using "cookies." A cookie is a small file or string of text on the site user's computer that is used to aid web navigation.

We use the following different types of cookies to monitor web activity:

### Mandatory Cookies

Mandatory cookies enhance your browsing experience and are also required for the effective functioning of our website, services and applications.

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## Functionality Based Cookies

Functionality based cookies allow our website, services and applications to remember choices and preferences that you make (e.g. when you login) and provide more personalised features during browsing. These cookies can also be used to remember customisable changes made by you.

## Performance Based cookies

Performance based cookies collect information about how visitors and members use our website, services and applications. Cookies of this nature typically do not collect personally identifiable information. All information these cookies collect are by default aggregated, anonymous and used to improve the way our website, services and applications work.

The table below explains the cookies we use and why:

Cookie Type	Purpose
Google Analytics	These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. <a href="#">Click here for an overview of privacy at Google</a> . To opt out of being tracked by Google Analytics across all websites visit <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a> .

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## Information Security

Working at Height Limited has taken measures to protect and safeguard the integrity of your data by implementing appropriate technical and security measures to protect your personal data against unauthorized access to, unauthorized alteration, disclosure or destruction of data.

In compliance with this requirement Working at Height Limited has put in place physical and technical security measures to protect the confidentiality of personal data. Including, inter alia.

- ① Access to personal information is restricted to authorised staff on a “need-to-know” basis and in compliance with the Data Protection Acts.
- ② Electronic personal data is protected by stringent access controls, passwords, access logs, audit logs, back-ups etc.
- ③ Screens, printouts, documents and files showing personal data will not be visible to unauthorised persons.
- ④ Appropriate facilities are in place for disposal of confidential waste.
- ⑤ Personal manual data will be held securely in locked cabinets, locked rooms, or rooms with limited access.
- ⑥ Special care will be taken if storing personal data on mobile computing and storage devices. Where deemed high risk, the data will be encrypted, and a record kept of the nature and extent of the data and why it is being stored on a portable device. Arrangements will be in place to fully delete the data on the portable device when it is no longer being used.

Access to personal information is restricted to Working at Height Limited employees and partners on a need-to-know basis in order to operate, develop or improve our services. These individuals are bound by confidentiality and contractual obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

## Safeguarding Information

Working at Height Limited understands the importance of technical and online security, and as such has taken a number of steps to enhance the protection of personal information sent to or from Working at Height Limited over the Internet. Unfortunately, no data transmission over the internet can be guaranteed to be 100% secure. Accordingly, and despite our efforts and best intentions, Working at Height Limited cannot guarantee or warrant the security of any information you transmit to us, or to or from our online products or services.

## Links to Other Websites

Please be aware that despite efforts and measures we have taken to protect personal data, other Internet sites that link to the Working at Height Limited site or to a Working at Height Limited email may contain online privacy provisions that differ from these.

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To ensure your privacy is protected, we recommend that you review the privacy statements of other Internet sites you visit.

## Statement Changes

We may occasionally update this privacy statement to reflect regulatory changes or industry best practices. Therefore, we would suggest you periodically review this statement to stay informed about how we are meeting our obligations under the Data Protection Acts. Your continual use of the service constitutes your agreement to this privacy statement and any updates. Working at Height Limited will signal a change by revising the "Last updated" date at the bottom of this page.

## Fraudulent Emails Warning

From time to time, you may be contacted by our Team for housekeeping purpose. Working at Height Limited never contact you to request for your username and password by email or other medium. If you receive any emails purportedly from Working at Height Limited requesting such information, do not respond to such requests. Instead, please contact us by telephone (01-6289374 immediately.

## Data Subject Rights

You have the following rights, in certain circumstances and subject to certain restrictions, in relation to your personal data:

**Right to access the data** – You have the right to request a copy of the personal data that we hold about you, together with other information about our processing of that personal data.

**Right to rectification** – You have the right to request that any inaccurate data that is held about you is corrected, or if we have incomplete information you may request that we update the information such that it is complete.

**Right to erasure** – You have the right to request us to delete personal data that we hold about you. This is sometimes referred to as the right to be forgotten.

**Right to restriction of processing or to object to processing** – You have the right to request that we no longer process your personal data for particular purposes, or to object to our processing of your personal data for particular purposes.

## Working at Height Limited – Learner Handbook

**Right to data portability** – You have the right to request us to provide you, or a third party, with a copy of your personal data in a structured, commonly used machine-readable format.

If you wish to exercise any of the rights set out above, please contact the Working at Height Limited Data Protection Officer at [data@workingatheight.ie](mailto:data@workingatheight.ie)

Please note that in order to authenticate any request we may ask you for a copy of a current driving license or passport so that we may verify your identity. This information will only be used for verification purposes, not stored and securely destroyed once the query has been closed.

You also have the right to lodge a complaint with the Irish Data Protection Commission if you are not happy with the way we have used your information or addressed your rights. Details of how to lodge a complaint can be found at on the [Data Protection Commissioner website](#) or call the Data Protection Commissioner on Locall 1890 252 231.

\* Processing includes the collection, recording, organisation, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure, alignment or combination, restriction and the erasure or destruction of personal data.

# Working at Height Limited – Learner Handbook

## Reasonable Accommodation Reasonable Accommodation Policy

It is Working at Height Limited's policy that reasonable accommodation will be made for learners with disabilities or who fall under the nine grounds for discrimination under the Equal Status Acts 2000-2018.

Reasonable accommodation is a process intended to mitigate, as far as possible:

- the impact of a disability on a learner's engagement with a training programme; and/or
- ensure that appropriate supports are available to any individual covered by equality legislation.

The overall aim is to take positive action, as far as is reasonably possible, to facilitate the learner in their training and assessment during the programme, thereby ensuring that the learner is able to access and participate in the programme on an equal basis when compared with other learners.

In relation to programme access and participation, Working at Height Limited will use its best endeavours to provide reasonable accommodation to meet the needs of any learners with a disability or facilitate those learners covered by equality legislation, subject to the learner meeting the minimum entry requirements for a programme.

In relation to assessment, the aim is to achieve fairness and consistency in Working at Height Limited's approach to this area. Reasonable accommodation must incorporate suitable adaptation of assessment when necessary to cater for learners whose personal situation may mean that an assessment would be otherwise unfair.

## Reasonable Accommodation Procedure

### 1. Purpose

The purpose of this procedure is to ensure that all requests for reasonable accommodation by learners are considered and dealt with efficiently and fairly

### 2. Scope

This procedure relates to all requests for reasonable accommodations.

### 3. Responsibility

The Head of Training & Quality is responsible for considering all requests for reasonable accommodation.

The Academic Board has oversight of this policy and procedure.

### 4. Records

Reasonable Accommodation Request form



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## 5. Procedure

Reasonable accommodation is made for students with disabilities or other issues covered under the nine grounds for discrimination and in accordance with the Equal Status Act 2000-2018.

The Learner must indicate that they require Reasonable Accommodation when booking the course. They will be sent a Reasonable Accommodation form which they must complete and return for consideration with supporting evidence. The full process is outlined below.

The trainer must be informed before the course commencement of any reasonable accommodations required.

Working at Height Limited will provide reasonable accommodation to meet the needs of any learners with a disability. In relation to assessment, reasonable accommodation incorporates adaptation of assessment when necessary to cater for learners whose personal situation may mean that an assessment would be otherwise unfair.

- This can include a reading out questions for learners that may have literacy issues.
- This will be carried out on a one-to-one basis to ensure that other learners are not disturbed or cannot hear the answers.
- This may also include allowing students to perform skills from a seated to perform skills from a seated or table height position if necessary.
- Appointment of scribes
- Modified briefs
- Rest periods and/or additional time
- Adaptive technology equipment and/or software
- Oral or video evidence

This will be noted on the Assessment Sheet.

Information pertaining to reasonable accommodation will be made available to learners at the enrolment stage and it is available in the learner handbook.

It is the learner's responsibility to make a request for reasonable accommodation to the tutor/trainer/assessor at the time of booking or before the course commences.

Learners indicate that they require reasonable accommodation when booking and also registering on the course.

The learner will be forwarded a Request for Reasonable Accommodation Application form.

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The learner will complete the Reasonable Accommodation Application format least a week in advance of the course.

The following may be required as supporting evidence:

- ① Medical Report
- ① Occupational Therapist Report
- ① Educational Psychologist Report
- ① Evidence of previous support provided during a state exam

All requests will be held in confidence as per Working at Height Limited confidentiality and security of personal data.

The Request for Reasonable Accommodation will be forwarded to the Head of Training and Quality for consideration.

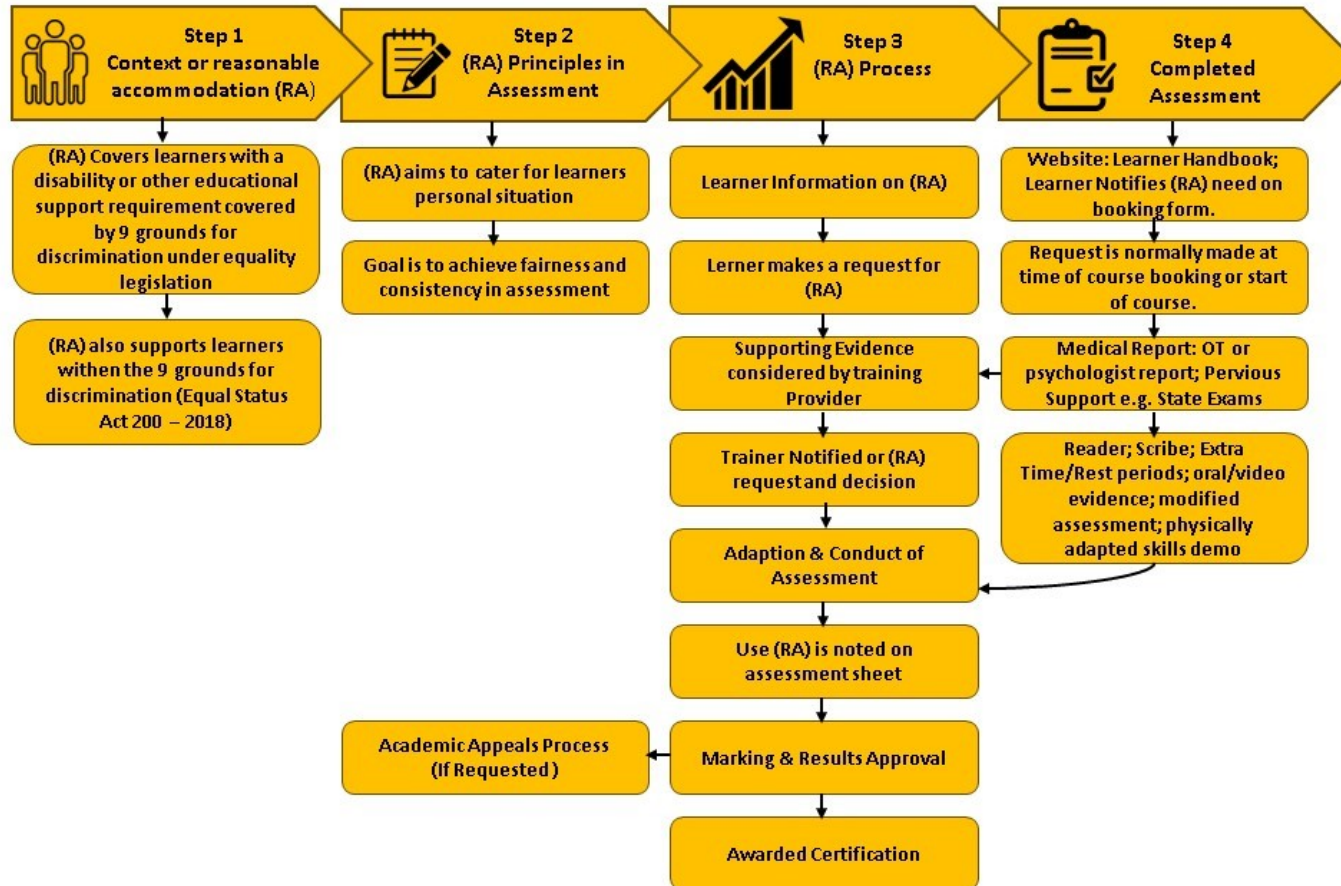
The Head of Training and Quality will inform the learner and trainer about his decision and arrangements that will be put in place to accommodate the learner.

These arrangements include:

- ① Extra time/rest periods
- ① Oral/video evidence
- ① Modified assessment
- ① Physically adapted skills demonstration and assessment.

Use of reasonable accommodation and adaptations will be noted on the Assessment sheet.

## Working at Height Reasonable Accommodation: Principles and Process



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