



COMPLAINTS AND APPEALS POLICY

At Vagabond Wines each of our students is important to us, and we believe you have the right to a fair, swift and courteous service at all times. Once we are in receipt of your complaint we will deal with it promptly, effectively and in a positive manner.

Vagabond Wines operates a complaints procedure through which it aims to resolve concerns as quickly as possible. A complainant may be a student or prospective student. All complaints will be taken seriously and dealt with impartially. We aim to assist students in resolving issues regard bookings, courses or non – exam related concerns and to promote a positive experience for our students.

Vagabond Wines will do its best to resolve student complaints for the academic and non-academic issues in a timely manner with the aim of resolving and settling a formal complaint in 14 working days or less. Records of student’s complaints will be retained for one year. No student will be criticised or retaliated against for using this procedure in a cooperative manner.

COMPLAINTS PROCEDURE

1. Your complaint should be submitted in writing by email to the Student Service Manager at wset@vagabondwines.co.uk (adding ref: complaint) or by post to:

Operations Manager
Vagabond Wines
1 Mark Square
London
EC2A 4EG

We are committed to deal with your complaint without any discrimination or prejudice. Please note, your complaint will be confidential and if your complaint is on behalf of someone else, we have to know that you have their permission before we can proceed further.

2. Please provide us with your contact details (address, email address, telephone number), specific details of the complaint and any supporting evidence you may have or details of any previous attempts you have made to resolve your complaint.
3. Your complaint will be dealt with by Vagabond Wines Operations Manager. Your complaint will be acknowledged within 3 working days and we will endeavour to send a final response to you within 14 working days of it being raised. If we are unable to provide you with a final



response within this time frame, we will send you an update explaining why and advice when you can expect a final response.

4. If more than 6 weeks from the date of your complaint has passed and you haven't received a final response from us, or you are still dissatisfied with the response you have received (at any stage of the process), your complaint will be referred to the Managing Director at Vagabond Wines. The Managing Director will renew the complaint and may request further information as needed. You will receive a response within 5 working days.

5. If the response you receive is not satisfactory, you may file a complaint with the WSET Awards as the awarding organisation responsible for WSET qualifications. Please contact appadmin@wsetglobal.com.



CONFLICT OF INTEREST

Definition of conflict of interest

A conflict of interest exists where an individual has interests or loyalties that could adversely influence their judgement, objectivity or loyalty to WSET Awards when conducting activities associated with our qualifications. These can arise in many different aspects of awarding organisation activity, such as:

- An individual whose personal interests or loyalties conflict with their awarding organisation involvement.
- An individual who receives remuneration for services that conflict with their awarding organisation involvement.
- An individual whose acts put WSET Awards in a position of non-compliance with its regulatory responsibilities.

Whilst it would be impossible to give a definitive list of scenarios representing potential conflicts of interest, the following have been identified from WSET Awards' Risk Management review as significant. However, other scenarios will constitute conflicts of interest, and we will take actions to redress any such instances that come to our attention other than by declaration from the individual concerned. Such actions may also include the imposition of sanctions, if deemed appropriate.



Specific examples of conflicts of interest include the following:

- The undertaking of any assessment of candidates by an individual who has a personal interest in the result of the assessment for any or all individuals concerned.
- The undertaking of any moderation of assessment of candidates by an individual who has a personal interest in the result of the assessment for any or all individuals concerned.
- The tutoring of candidates by any individual involved in the assessment process.
- The undertaking of a WSET-regulated qualification by any individual employed by an APP.
- The undertaking of a WSET-regulated qualification by any individual employed by WSET Awards.
- The invigilation of a WSET-regulated qualification by any individual involved in the delivery of training leading to the assessment.
- The delivery of “coaching sessions” to examination candidates by any individual involved in the assessment of candidate scripts or the authoring of examination questions.
- The employment by an APP of individuals engaged in the delivery of taught programmes or in the role of Internal Assessor in another APP.

Some of these examples can be managed and are therefore acceptable. For example, the marking of tasting assessments by Level 3 Internal Assessors is ALWAYS verified by WSET Awards as they have an interest in the results of the assessments of learners they have taught. Our verification process mitigates this conflict of interest. Similarly, where an employee of the WSET or one of its APPs undertakes a WSET qualification, we can put measures in place to maintain the integrity of the assessment, PROVIDED we are notified of this conflict of interest in advance of the assessment. However, it would be inappropriate for any individual involved in the authoring of examination questions or the compilation of examination papers to teach or coach learners under any circumstances as there are no options for us to mitigate the effect of this clear conflict of interest.

GUIDANCE ON HANDLING CONFLICTS OF INTEREST

Any individual engaged with WSET Awards in the provision of our regulated qualifications, as identified under the scope of this policy, is required to make a “Declaration of Interest” by informing WSET Awards of any potential conflict of interest. Certain individuals, such as those involved in the assessment process are also required to submit a signed declaration of “Non-disclosure”. It is essential that any conflict of interest is declared to WSET Awards immediately to ensure this does not compromise our status of compliance with our regulator, Ofqual. Anyone who fails to declare a



potential conflict of interest is in breach of our criteria for approval, and sanctions may be applied to their approval status as a result.

WSET Awards has processes and procedures in place to manage actual or perceived conflicts of interest. These include the exclusive involvement of WSET Awards staff in the creation of all assessment materials, moderation of all internal assessment conducted by APPs and moderation of all written examinations not marked by optical mark readers. There are of course many other instances of conflict of interest for which we do not have documented procedures in place. Such instances will be handled on an individual basis to ensure that the integrity of our assessments is not compromised.

**Roles, responsibilities and procedures in the handling of actual or perceived conflict of interest:**

The Director of WSET Awards and the Centres Co-ordination and Quality Assurance Manager have responsibility for the day-to-day managing of conflicts of interest relating to functions of WSET Awards. The members of the Senior Management Team of the Wine and Spirit Education Trust have responsibility for the day-to-day managing of conflicts of interest relating to functions of the Wine and Spirit Education Trust's functions as a whole.

It is the responsibility of all individuals engaged in the provision of WSET qualifications to promptly report any potential for conflict of interest to the Centres Co-ordination and Quality Assurance Manager at WSET Awards.

All instances of conflict of interest will be recorded in WSET Awards Incidents Register, including details of steps taken to mitigate any adverse effect resulting from such conflict of interest. The Director of WSET Awards is responsible for determining what action needs to be taken to mitigate any adverse effect and for deciding when and how matters relating to actual or potential conflicts of interest should be escalated within the Wine & Spirit Education Trust, to the Board of Trustees or to the regulators.



DATA PROTECTION

Vagabond complies with its obligations under data protection legislation by keeping **personal** data up-to-date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure; by ensuring that appropriate technical measures are in place to protect personal data and by guaranteeing total transparency on how we manage your data.

This document sets out our data processing practices and your rights and options regarding the ways in which your personal data is used and collected. If you have any queries, please contact WSET's data protection officer by emailing tessa@vagabondwines.co.uk

Why we collect your data:

1. To process your registration for any WSET-hosted course or event so that we can deliver these services to you
2. To send you information regarding the course or event for which you are registered (or which have registered interest in)
3. To process sales of products or services you have purchased from us
4. To register you as a candidate with WSET Awards and enable you to sit examinations for WSET qualifications
5. To administer and conduct your examination, including making arrangements for reasonable adjustments and/or special considerations
6. To communicate with your course provider and issue your examination results and qualification certificate as appropriate
7. To provide you with post-results services such as enquiries against results and appeals and solicit feedback from you on WSET qualifications
8. To manage any account(s) for providing our online services including but not restricted to our online classroom and Global Campus where you have registered with us so that:
 - We can provide you with the relevant products and services
 - You can access relevant course materials
 - We can fulfil our services and communicate with you about them
 - To verify your identity
 - To carry out research to better understand your requirements on the relevant products and services
9. To personalise, report on and improve the services and products we provide to you, and to provide you with a best-in-class customer service experience



10. To send you marketing communications including information about our qualifications, upcoming events and links to our blogs.

Other legitimate interests:

When we send you news regarding our products we will do so on the basis that we have your consent. However, to allow us to provide continual best-in-class service we believe we have legitimate interest to process your personal data so that we can:

Improve our existing product range and services

- Provide you with a best-in-class customer service experience
- Protect you as our customer, our employees and our business
- Understand your likes and dislikes, what services you wish to hear about and how best to contact you to inform you about them

Personal data we collect

We may collect the following information about you:

- Your name, date of birth, gender and contact details
this could include your postal address, telephone numbers and email address
- Purchases and orders made by you or on your behalf by your chosen course provider
- Your payment card details (which are encrypted) when you purchase any products or services
should you pay for one of our products or services over the telephone or using one of our payment forms, your card details will not be retained and will be securely destroyed
- When you set up any account with us, your login credentials
- Your marketing preferences
- Your correspondence with us
- In certain situations, information relating to health which may be required to support applications for reasonable adjustment and/or special consideration in the context of examinations for WSET qualifications

Sharing your personal data with third parties

For us to provide you with products and services, we on occasion share some of your personal data with certain approved third parties. These include course providers, examiners, suppliers, sub-



contractors and regulatory bodies. Some of these third parties are based outside of the European Economic Area, however we always seek to make sure that your personal data is secure at all times.

When do we share your personal data?

1. With core service providers to enable our business to function

We rely on a set of external companies who are governed by contractual agreement to provide us with services that enable our business to run effectively. For example – email marketing services, IT service providers for data storage and business continuity/disaster recovery, courier services for the delivery of course materials and course providers.

2. With law enforcement agencies and regulators when required to do so by law

We are required to co-operate with regulators (like the Information Commissioners Office) and law enforcement agencies (like the police or the Serious Fraud Office). Although it does not happen often, regulators and law enforcement agencies can require us to share information with them as part of an investigation, this may include your personal data.

What personal data do we share?

We need to process some of your personal data to fulfil your registration on any WSET-hosted events or courses. We will share your payment details with our bank or clearing house so that we can process payment for your purchases or orders. When you sit an examination for a WSET qualification, WSET Awards will process your script which may contain personal data. It may be marked, verified or reviewed by third-party examiners.

How do we keep your shared personal data secure?

- We conduct a data security review of any third party we are required to share your personal data with to ensure that they meet our high security standards
- Every company we work with is required to have a contract with us that clearly describes how your personal data is kept secure
- We will only ever share data specific to its intended use
- Specific details of what data we have shared is available to you on request

Data retention – how long do we hold your personal data

- We will not hold your personal data for longer than is necessary for the purposes described in this policy.
- We will keep your personal data whilst your accounts remain active
- We may keep categories of personal data, e.g. name, date of birth and address, after your accounts are closed to meet any legal or regulatory requirements

Vagabond Wines has a disaster recovery plan in place should there be any loss of data. This procedure is reviewed on an annual basis. Should you have any concerns or queries on how your data is being kept, please refer to Vagabond Wines, Data protection officer via email.

tessa@vagabondwines.co.uk



DIVERSITY AND EQUALITY POLICY

Vagabond Wins fully supports the principles of Equal Opportunities. We strive to ensure that all candidates for our qualifications are treated fairly and on an equal basis

Equal Opportunities are assured by:

- The selection, recruitment and training of those working for Vagabond
- Consideration at an early stage in the development of new schemes or qualifications;
- Ensuring that the format and content of all syllabi, examinations and other do not discriminate against anyone which is the responsibility of WSET Awards by whom we are approved to teach WSET qualifications;
- Ensuring there are no barriers to entry to units and qualifications, which we deliver and/or offer, for disabled people, women or men, or people from different racial groups, other than those directly related to the integrity of the units or qualifications. The nature of any barriers will be stated and the inclusion of the requirements that create the barrier justified only and explicitly in terms of the integrity of the unit or the qualification. Details of how the effect of any barriers will be mitigated will be recorded, including using access arrangements or including reasonable adjustments.
- Clarifying the responsibility of all members of staff and/or consultants, who are involved in the delivery of WSET courses within Vagabond Wines, to comply with this policy. In particular external parties invited by Vagabond to contribute to these development arrangements must also, as representatives of relevant learners, ensure that the views of learners and others are taken into account in the development of QCF units and qualifications.
- Anonymous assessment of examination candidates wherever possible;
- Promoting practices and procedures that give equal opportunities to everyone;
- Being required to have equal opportunity policies in place;
- The variation of any conventional rules and regulations for the conduct of examinations which might inhibit the performance of candidates with specific needs, provided that the standard, quality and integrity of the assessment is not compromised.
- Working as appropriate with relevant organisations and agencies to develop measures to identify and prevent inequality of opportunity;
- Making every effort to ensure that there is equality of opportunity in its assessment process, regardless of the candidate's gender, age, racial origin, religious persuasion



- (prayer room available upon request), sexual orientation or disability;
- Ensuring, to the best of our ability, that any documentation produced does not contain language or images which may be regarded as offensive or stereotypical, and that they reflect the diversity of contemporary society;

Vagabond Wines is an equal opportunities organisation and will consider applications from any organisation or individual who can demonstrate that they meet our approval criteria.

This policy is published on our Candidate Booking Form and will be provided to any student on demand

Monitoring

Vagabond Wines will comply with all current and relevant legislation and this policy will be monitored and reviewed annually. At the time of writing relevant legislation includes, but is not limited to:



- The Rehabilitation of Offenders Act 1974;
- The Sex Discrimination Act 1975;
- The NHS Community Care Act 1990;
- The Disability Discrimination Act 1995;
- The Asylum and Immigration Act 1996;
- The Human Rights Act 1998;
- The Sex Discrimination (Gender Realignment) Regulations 1999;
- The Employment Equality (Religion or Belief) Regulation 2003;
- The Employment Equality (Sexual Orientation) Regulation 2003;
- The Equal Pay Act 1970 (Amendment) Regulations 2003;
- The Race Relations Act 1976, The Race Relations (Amendment) Act 2000, and Amendment Regulations 2003;
- The Gender Recognition Act 2004;
- The Employment Equality (Sex Discrimination) Regulations 2005;
- The Employment Equality (Age) Regulation 2006;
- The Equality Act 2006; and
- The Equality Act (Sexual Orientation) Regulation 2007.

Note, from April 2010 the Equality Bill may come into force, which will replace all existing discrimination legislation and the Acts listed above.

As part of the monitoring of candidates registering for a WSET® qualification we will collect information on diversity, requests for special consideration, access arrangements and feedback from learners, centres and other stakeholders.

All relevant issues identified as suggesting our provision or services have unnecessary impact on learners will be reported back to the Centre Registration and Quality Assurance Manager who will be responsible for leading on introducing amendments to provision and/or services where



necessary and in accordance with our documented procedures for developing and reviewing units and qualifications. Details of the outcomes of each review will be made available to the qualification regulators upon request.

NOTE TO CANDIDATES

Candidates who believe they have been discriminated against should contact us in the first instance for advice



REASONABLE ADJUSTMENTS

A reasonable adjustment is any action that helps to reduce the effect of a disability or difficulty that places the candidate at a substantial disadvantage in the assessment situation.

Vagabond Wines seeks to conduct the assessment of all candidates in a way that puts them at no disadvantage, or advantage, over other candidates. However, whilst Reasonable adjustments must not affect the integrity of what needs to be assessed, but may involve:

- Changing standard assessment arrangements, for example allowing candidates extra time to complete the assessment activity
- Adapting assessment materials, such as providing materials in large text format
- Providing access facilitators during assessment, such as a sign language interpreter or reader
- Re-organising the assessment room, such as removal of visual stimuli for an autistic candidate.

Reasonable adjustments are approved or set in place before the assessment activity takes place; they constitute an arrangement to give the candidate access to the qualification. The use of reasonable adjustment will not be taken into consideration during the assessment of a candidate's work. Out of fairness to all candidates, evidence of the individual circumstances giving rise to the request must be produced.

Vagabond Wines will:

- Identify any special assessment needs at the time of candidate registration.
- Inform WSET Awards at the earliest opportunity so that appropriate arrangements can be made.
- Agree the specific arrangements for the examination, or for marking with WSET Awards, which will vary according to individual circumstances.

WSET Awards reserves the right to seek the advice of independent agencies as appropriate in coming to a decision on specific arrangements and must agree before any reasonable adjustments are offered by Vagabond Wines to its students.

Please submit any Requests for Reasonable Adjustments at least 5 weeks before the date of the examination. Vagabond Wines will forward any Requests for Reasonable Adjustments to WSET Awards within 5 working days of receipt and WSET Awards will respond after 4 working weeks after giving the request due consideration.

Candidates and their advisors should also be aware:

- That it is not appropriate to make requests for special arrangements where the candidate's particular difficulty directly affects performance in the actual attributes that are the focus of the assessment.



- Reasonable adjustments will not give unfair advantage over candidates for whom reasonable adjustments are not being made, or alter the assessment demands of the qualification as detailed in the qualification specification.

SPECIAL CONSIDERATION

Special consideration is an action taken after an assessment to allow candidates who have been disadvantaged by temporary illness, injury, indisposition or adverse circumstances at the time of the assessment to demonstrate attainment.

A candidate may be eligible for special considerations if:

- Performance in an examination is affected by circumstances beyond the control of the candidate. This may include recent personal illness, accident, bereavement or examination room conditions;
- Alternative assessment arrangements which were agreed in advance of the assessment proved inappropriate or inadequate;
- The application of special consideration would not mislead the end-user of the certificate.

WSET Awards must be notified in writing within seven days of the examination date where special consideration is being requested using the **Request for Special Consideration Form**. Eligibility will only be considered if accompanied by supporting independent documentation, and please allow extra time for Vagabond Wines to pass your request to WSET Awards.

Where a candidate is unable to attend an examination due to recent personal illness, accident or bereavement, Vagabond Wines will endeavour to transfer the candidate to an alternative examination date at no extra cost.

In cases of serious disruption during the examination, the Examinations Officer of Vagabond Wines must submit a detailed report of the circumstances and candidates affected to the Examinations Administrator at WSET Awards, in addition to the Examination Papers.

It should be noted that WSET Awards does not offer aegrotat awards and that all assessment requirements of WSET qualifications must be met. It is also our policy that special considerations will not give unfair advantage over candidates for whom special considerations are not being applied, or alter the assessment demands of the qualification as detailed in the qualification specification. Further guidance is available under Guidance for Reasonable Adjustments and Special Considerations.

If a candidate is unable to attend an examination for which they have been registered due to circumstances outside their direct control, they should notify Vagabond Wines as soon as possible, and complete the "Request for deferral" form submitting written 3rd party evidence to support their application. Failure to attend due to work commitments does not qualify under our "extenuating circumstances". Vagabond Wines will not charge an unused paper fee for applications where approval from WS



MALPRACTICE AND MALADMINISTRATION

Vagabond Wines will ensure that their programme for the delivery and administration of any WSET qualification complies in all respects to the rules, regulations and procedures set out in the WSET Operating Handbook. All WSET examinations run by Vagabond Wines will be administered in line with the Centre Agreement, Code of Practice and Invigilation Instructions provided in the Operating handbook, and Examination Regulations issued to all schools and Students in the Qualification Specifications.

Failure to abide by these criteria will be considered Malpractice and or Maladministration and may affect our ability to continue teaching WSET qualifications. Malpractice can arise from any act, omission, event, incident or circumstance that prejudices learners, affects public confidence in qualifications, affects the standards of qualifications which the awarding body makes available or affects the ability of the awarding body to undertake the development, delivery or award of qualifications. Maladministration relates to a failure by Vagabond Wines to offer WSET Qualifications in accordance with the rules, regulations and operating procedures set out in this Handbook

Programme providers must have in place procedures for dealing with instances of Malpractice and Maladministration should they arise. These policies will be made available to WSET Awards upon request, and form part of the criteria which must be met to become an certified school.

The headings below list categories of maladministration by the staff of Vagabond Wines and malpractice by staff and / or candidates which may adversely affect the integrity of WSET qualifications and certification. These examples are not exhaustive and are intended as guidance to Vagabond Wines and their candidates on the WSETs' definition of malpractice and maladministration.

Malpractice will include, but is not limited to:

- a) Actual or attempted Plagiarism, or cheating, of any nature by candidates;
- b) Use or attempted use of any reference material or electronic device during a closed book examination
- c) Disruptive behaviour by candidates in the examination;
- d) Candidates in breach of published Examination Regulations and Vagabond Wines in breach of invigilation rules or the Code of Conduct;
- e) Fraudulent use of WSET certificates;
- f) A deliberate attempt to discredit the WSET, or to bring the WSET into disrepute in any way;
- g) Issue of bogus examination results;
- h) Insecure storage of examination papers;



- i) Unauthorised amendment, copying or distribution of examination papers;
- j) Use of unapproved or ineligible educators to deliver a qualification course, or use of unauthorised internal assessors
- k) Change of examination location or altered facilities so they no longer meet the required standards;
- l) Failure to administer examination in line with the assessment requirements;
- m) Denial of access to resources (premises, records, information, candidates and staff) by authorised WSET representatives and / or the Regulatory Authorities



Maladministration will include, but is not limited to:

- a) Failure to follow procedures or adhere to regulations as laid out in the Vagabond Wines Operating Handbook;
- b) Failure to return examination papers within the required timeframe or
- c) Returning exam papers by regular post and not recorded delivery or trackable courier;
- d) Failure to issues results to candidates in a timely manner
- e) Breach or infringement of WSET copyright and trademarks;
- f) Non-payment of fees for WSET services or examinations;
- g) Breach of the Conflicts of Interest Policy
- h) Breach of the Centre Agreement or APP Code of Conduct;
- i) A change in control of the APP that results in new management being unable to meet WSET® Awards criteria;

Malpractice is divided into two main categories;

Major Malpractice

Serious and /or deliberate breaches of conduct, or serious neglect of professional duty, represents a high risk to the integrity of the qualification. Major Malpractice could result in the invalidation or revocation of examination results to a student and / or approval of Vagabond Wines. In this instance OfQual must be informed of the malpractice case and WSET Awards will take all appropriate action as directed by the Regulatory Authority, which may include notification to other Awarding Bodies. An example of Major Malpractice would be, 'Fraudulent use of WSET certificates and the issue of false examination results' or 'Unauthorised amendment, copying or distribution of examination papers'.

Minor Malpractice

Minor and /or accidental breaches of conduct or neglect of professional duty, or those more major breaches not considered to be deliberate or malicious in intent, represents a lower risk to the integrity of the qualification and would not affect examination results or certification. Examples of minor malpractice could include, 'failure to follow procedures laid out in the Operating Handbook' or 'Change of examination location or altered facilities so they no longer meet the required standards'.



Reporting Malpractice

Vagabond Wines will report any potential case of malpractice by candidates, educators, invigilators or centre staff to the Centres Co-ordinator and Quality Assurance Manager at WSET Awards immediately using **the Notification of Potential Malpractice Form**.

Failure to do so may result in the refusal to issue results and Certification to candidates, the invalidation of examination results or the withdrawal of approval to offer WSET qualifications.

Where Vagabonds personnel are involved, Vagabond will follow its own procedures and keep WSET Awards informed of the steps taken to resolve the situation.



Malpractice may be reported to WSET Awards by a WSET Awards appointed Approval Visitor. In this instance Vagabond Wines will be advised during the approval visit that a case of Malpractice is being reported.

WSET Awards will also act upon reports of suspected or actual malpractice received from candidates or other parties regarding Vagabond Wines activities or personnel which may affect the integrity of WSET qualifications.

WSET® Awards responsibility

WSET® Awards will confirm receipt of a report of suspected or actual malpractice within 3 working days.

Should a case of malpractice be raised with WSET® Awards against the Programme Provider, the main contact, or other appropriate person within the management of the APP, will be notified and invited to respond prior to further action being taken. Notwithstanding the foregoing, WSET® Awards reserves the right to immediately suspend an APP's approval if, after consultation with the WSET's Chief Executive, it is decided that such a suspension is required to protect the reputation of the WSET, and to prevent any possible re-occurrence of the alleged malpractice. In such circumstances, the APP will be notified immediately and will be required to co-operate with the WSET® whilst the alleged malpractice is investigated.

WSET® Awards will appoint a suitably trained officer to investigate the alleged malpractice and this officer will request supporting evidence from Vagabond Wines, Candidate or other parties to validate the report of suspected or actual malpractice.

When supporting evidence has been supplied, WSET® Awards will conduct a full investigation of the suspected or actual malpractice to identify the cause and to determine whether malpractice has actually occurred.

Where it is determined that malpractice has occurred, a report will be filed. This will include whether the malpractice is accidental or deliberate, and represents a major or minor threat to the integrity of the qualification, and specify any sanctions that are to be applied to Vagabond Wines, their staff or the candidate concerned. If malpractice has been alleged against a candidate, a summary of the investigation and the findings will be sent to the candidate; if the malpractice has been alleged against Vagabond Wines the summary will be sent to the Main Contact, and the candidate or Vagabonds' Main Contact will be advised of the sanctions being imposed. They will also be advised of the General Appeals Policy should they wish to appeal the decision that has been made.

Any case of malpractice that threatens the integrity of the qualification, results issued or certification will be reported to the Regulatory Authority, and following discussion with the Regulatory Authority, other Awarding Bodies may be notified.



Where the report is the result of an internal investigation by the Vagabond Wines, WSET® Awards will review all the documentation supplied and action taken to ensure that any decisions made by Vagabond are valid and conform to this policy. WSET® Awards may request additional information to determine whether any additional sanctions should be applied to Vagabond, their staff or the candidate concerned.



Our responsibility as educators which we agree to carry out in full

Vagabond Wines Main Contact is responsible for ensuring that all staff involved in the delivery and / or administration of the WSET® programme run it in accordance with the rules, regulations and procedures set out in this manual, and are aware of, and comply with, this policy. Vagabond Wines must also establish their own framework of controls and checks that in their opinion is adequate to minimise and identify any instances of malpractice and is fit for purpose of reporting and investigating any alleged malpractice. Should Vagabond Wines require help in establishing a framework that will prevent, investigate and deal with Malpractice, please contact awards@wset.co.uk

The main Contact agrees to co-operate fully with WSET® Awards in any investigation of alleged malpractice at Vagabond Wines including the removal and / or suspension of staff from their WSET® duties during such investigation.

Sanctions

In cases of alleged malpractice or maladministration WSET® Awards has the right to apply sanctions. This may include suspend Vagabond Wines approval with immediate effect if such action is approved by the Chief Executive of the WSET® whilst an investigation is carried out. Following an investigation by WSET® Awards, it may be necessary to apply one or more of the following sanctions against Vagabond Wines and/or their staff.

- Creation of an action plan / letter of warning;
- Completion of a self-assessment form by Vagabond;
- Completion of Vagabonds' re-approval visit (travel costs may be charged to Vagabond);
- Mandatory re-training of educators and / or assessors;
- Application of administration charges;
- Withdrawal of internal assessment permissions;
- Invalidation of examination results / certification;
- Withdrawal or temporary suspension of approval to offer a specific WSET® qualification;
- Withdrawal or temporary suspension of approval to offer all WSET® qualifications;
- Withholding examination results that are under investigation;
- Rejection of orders for further materials or examination papers;



- Withdrawal of credit facilities, and moving account to a “cash on order” basis;
- Charging of interest on overdue amounts.

Where previously agreed corrective measures are not implemented, the sanctions will progress to the next level of severity following the guidelines of the NVQ Code of Practice.

It is WSET Awards intent that no learner should be disadvantaged by any instance of malpractice or maladministration that has arisen by the actions (or non-action) of Vagabond. However where such breach undermines the integrity of the assessment process, it may be necessary to invalidate the exam that has been held and require Vagabond to arrange a free resit for candidates at their convenience.

Following an investigation by WSET® Awards, it may be necessary to apply one of more of the following sanctions against an individual candidate or candidates.

- Letter of warning;
- The disallowing of an examination result;
- The invalidation of a certificate and/or unit certificate and recall of certification already issued;
- Refusal of entry to future WSET® qualifications.



All decisions with regard to malpractice will be communicated in writing within 20 working days following receipt of supporting documentation. Where it is not possible to respond within this timeframe, a written response will be given providing a date for completion.

Any candidate, educator, invigilator or APP has the right to appeal any decision made against them using the **General Appeals** section of this handbook, or as detailed in the **WSET® Customer Service Statement** .



CANCELLATIONS AND REFUNDS

Cancellations

Cancellations of confirmed places are accepted up to 10 working days prior to the start of the course. An administration fee of £25.00 plus the full cost of the study materials supplied will be deducted and the remainder of the course fee refunded to the payee. Transfers of a confirmed booking either to another course or applicant can be made up to 10 working days before the course start date on payment of a £25.00 admin fee plus the cost of any additional study materials which may be applicable.

Transfers

If a confirmed course booking is cancelled during the ten working days prior to the start of the course, or at any time after the start of the course, no refund or transfer of the course fees will be made. Examination dates are fixed to the course onto which you book and any transfer to an alternative date will incur an administration fee of £25.00. All transfer requests must be made in writing or by email to wset@vagabondwines.co.uk at least 10 working days before the original examination date.

Transfer requests made within 10 working days of the examination date will incur the admin fee and cost of examination paper which will have been ordered via WSET Awards. Course fees will be refunded in full if the London Wine & Spirit School changes a course date or cancels a course if enrolments do not reach the required minimum numbers – notification will be made in the 10 working days prior to the planned start date of the course. Please note all transfers are subject to availability on alternative course/examination dates.

