Fonact Stands For CURIOSITY EXCELLENCE PASSION SELF-DISCOVERY & HUMANITY

# FONTAINEBLEAU S C H O O L O F A C T I N G

#### INTERNAL RULES

These internal rules are set out pursuant to French law, and more specifically, Articles L. 6352-3 ff. of the French Labour Code ['Code de travail'], per their wording following Law no. 2018-771 of 5 September 2018 pertaining to the freedom to choose one's professional future.

They define the regulations in place at the Fontainebleau School of Acting (hereafter 'FONACT') regarding health, safety and security and hygiene. Their purpose is also to set out general and permanent rules and regulations related to discipline, as well as the nature and scale of disciplinary measures that can be taken as regards students.

Anybody participating in a FONACT activity that serves to develop his or her skills is required to observe these internal rules for the duration of the activity being undertaken.

Where training takes place in an establishment for which internal rules are already in place, the health, safety and security measures that apply to students are those of that establishment's internal rules.

All students are subject to the internal rules set out in this document prior to their official registration.

#### 1. General conduct

All individuals involved in FONACT activities are required to behave in such a way that ensures that basic manners and social conventions are respected, and, more broadly, that goods and people are respected, so as to ensure, for the good of all, that the training runs smoothly.

No behaviour shall pose a threat to public order or the smooth running of FONACT.

Everyone is required to follow these internal rules. They should be implemented and interpreted in good faith.



# 2. Rules regarding health, hygiene and safety and security

It is essential that everyone prevents any risk of accident or illness, and this requires everyone to follow:

- The relevant instructions regarding hygiene and safety and security at training sites.
- Any instructions given by either the FONACT management or course leaders, especially with regard to the use of resources that have been made available.

Every student must ensure his or her personal safety and security, and that of others, by following the general and specific instructions pertaining to hygiene and safety and security. Preventing any risk of accident means keeping any resources made available in the context of the course in working order and in good condition.

If a student becomes aware of any lapse in the security system, the student is required to alert the FONACT management to it immediately.

Not following these instructions exposes the person to disciplinary measures.

# 2.1. Fire procedures

Fire procedures, and specifically maps indicating the location of fire extinguishers and emergency exits, are displayed at FONACT premises. Students should familiarise themselves with them.

If an alarm sounds, all students must stop what they are doing and calmly follow the instructions given by the emergency services or an authorised FONACT representative.

Any student who sees a fire starting must immediately contact the fire brigade by dialling 18 from a landline or 112 from a mobile telephone and must alert a FONACT representative.

# 2.2. Alcoholic drinks and drugs

Bringing any form of drug or alcoholic drink onto the premises or consuming any form of drug or alcoholic drink on the premises, is formally prohibited. Students are prohibited from entering or staying on any premises while drunk or under the influence of drugs.



Bringing drugs to course sites or taking, selling, or supplying drugs at course sites is strictly prohibited. Non-adherence to this rule may give rise to criminal sanctions, in additional to the disciplinary measures set out in these internal rules.

# 2.3. Ban on smoking

Per Decree no. 2006-1386 of 15 November 2006, smoking is formally prohibited, specifically in any closed or covered areas that are open to the public or that constitute workplaces, as well as in establishments designed to provide training.

As a result, smoking and vaping (the use of electronic cigarettes) is prohibited in training rooms and more generally within FONACT.

# 2.4. Accidents

Any student who suffers an accident during training or while travelling between the training site and his or her accommodation or workplace, or who witnesses such an accident, shall immediately alert the FONACT management to it.

The FONACT representative shall carry out the necessary health-and-safety measures and draw up a declaration for the relevant social-security department.

#### 2.5. Loss or theft

Personal goods and effects are under the sole supervision and responsibility of their owners. In case of loss or theft, FONACT shall not be held responsible for any detrimental consequences that thus arise.

To prevent problems, students are requested not to leave their personal effects unsupervised and are asked to alert the establishment's management to any unknown individuals or suspect behaviour.

In case of loss or theft, any necessary administrative or legal procedures, as carried out through the appropriate authorities, are the responsibility of the student.

# 2.6. Keeping sites clean and in good condition

All students commit to keeping all rooms and sites as clean as possible. Eating food in any course room is prohibited, and under no circumstances is litter to be left in them. Damaging the FONACT premises, even slightly, is prohibited.



In case of any deviation from this regulation, FONACT reserves the right to hold the offender civilly or criminally liable, and to take any steps to exclude the student involved.

# 3. General discipline

# 3.1. Student attendance

# Course timetable

Students should follow the timetable established and sent to them in advance by FONACT.

Not following the timetable may lead to disciplinary measures being imposed. Except in exceptional circumstances, students may not absent themselves during course hours.

# Anticipated absence, late arrival or leaving

In case of absence, late arrival or leaving being anticipated prior to the timetable established, students should alert FONACT and indicate their justification for the event in question.

Where the student has a financial-support provider, FONACT shall immediately inform that provider (employer, management, vocational-training operator, region, employment centre etc.) about the situation in question.

Any event that is not justified by exceptional circumstances is liable to incur disciplinary measures. Any late arrival or anticipated leaving should be noted in writing on the attendance form so that exact times of arrival and leaving are detailed.

In addition, per Article R. 6341-45 of the French Labour Code, any student whose costs are covered by public authorities is liable to have his or her cost provision reduced in proportion to the duration of his or her absence.

# 3.2. Access to training site

Except where expressly authorised by the FONACT management, students may not:

- Enter or remain on course premises for any reason other than completing the course.
- Bring in anyone not connected to the organisation, have anyone not involved in the organisation brought in, or enable anyone not connected to the organisation to enter.
- Undertake to sell goods or services on course premises.



# 3.3. Clothing

Students are asked to attend training sessions in appropriate clothing, which must not, under any circumstances, pose a threat to the safety or security of goods or people.

# 3.4. Use of resources and equipment

Unless specifically authorised otherwise by the FONACT management, training resources and equipment are to be used at course premises and are to be employed solely in connection with training activities. The use of resources for personal ends is prohibited.

Students are required to ensure that any resources or equipment to which they have access during the training are kept in good condition. Students should use resources according to their purpose and in keeping with the rules explained by course leaders.

Students should immediately alert course leaders to any anomaly with respect to resources or equipment.

# 3.5. Ban on sharing educational material

Any FONACT educational material provided to students for any purpose is an intellectual product protected by intellectual-property law.

Under no circumstances may students reproduce, share, or loan any educational material or any documents related to course content for, with or to any other physical or legal person without FONACT's prior written approval.

# 4. Disciplinary actions

# 4.1. Punitive disciplinary measures

Should the student fail to meet any of the terms of these internal rules in any way, he or she may be subject to a punitive measure as issued by the FONACT representative or someone acting on his or her behalf.

Any act deemed an instance of wrongdoing may, in keeping with its nature and severity, be subject to one or more of the following punitive measures:

- Request to change behaviour; call to order.
- Written notice from the Director of FONACT or his representative.
- Formal warning.
- Temporary exclusion from training.
- Permanent expulsion from training.



Fines or other financial penalties are prohibited.

Where necessary, the FONACT representative or someone acting on his or her behalf shall notify the employer or financial-support provider of the punitive measure taken.

# 4.2. Disciplinary commitments *Student information*

No punitive measure may be imposed on a student without that student being informed in advance of the complaints brought against him or her.

Any act deemed an instance of wrongdoing prompting a temporary exclusion with immediate effect as a vital protective measure notwithstanding, no permanent punitive measure related to that act may be implemented without the student being informed in advance of the complaints brought against him or her, and potentially without the procedure described below being followed.

#### Summons to a meeting

Where the Director of FONACT or his representative intends to impose a punitive measure, the following procedure shall be followed:

- Summons of the student, by registered post with a request for acknowledgement of receipt or delivered to him or her against receipt.
- Notice of the purpose of the summons, as well as the date, time and location of the meeting, as well as mention of the possibility of the student being accompanied by a person of his or her choice (fellow FONACT course student or otherwise).

# Possible accompaniment during meeting

During the meeting, the student may be accompanied by a person of his or her choice; the student delegate, for example.

The Director or his representative shall explain the reason for the intended punitive measure and shall note the student's explanations.

#### Issuing of the punitive measure

The punitive measure may be imposed no less than one working day and no more than two weeks after the meeting. The punitive measure shall require written notification, which includes any reasons for it, being made to the student in the form of a registered letter or delivery against receipt.



# 5. Student representation

# 5.1. Holding elections

A regular delegate and a substitute delegate shall be elected at the same time, via a uninominal two-round voting process, according to the following conditions:

- All students may vote and are eligible. The vote shall take place during course hours, at the earliest twenty hours and at the latest forty hours after the course begins.
- The FONACT representative shall oversee the vote. He or she shall be responsible for it being run fairly. He or she shall send a statement of failure to elect to the Prefect of the region with authority over the area should student representation not be possible.
- The first round of voting requires an absolute majority. In the second round of voting, a relative majority suffices.

# 5.2. Duration of student delegates' mandates

Delegates are elected for the duration of the activity.

Their functions come to an end when they finish, for any reason whatsoever, participating in the training. If the regular delegate and the substitute delegate cease their functions before the training ends, a new election shall take place.

# 5.3. Role of student delegates

The delegates make suggestions related to improving how the courses are run and students' experiences at FONACT.

They present all individual and collective requests pertaining to these matters, hygiene and safety and security conditions, and the application of the internal rules.

# 6. Protection of personal data

Personal data supplied by students may be subject to computer processing with a view to ensuring the effective running of the course.

Students' personal data shall be stored according to appropriate strategies and methods for ensuring its security.



In accordance with the applicable legislation, everybody has the right to access and modify his or her personal data as may be processed by FONACT. To make a request relating to personal data, please contact the following individual: admin@fonact.com

Any individuals involved have the right to lodge a complaint with the French National Commission for Computing and Civil Liberties ['Commission nationale de l'informatique et des libertés'].

Information requested by FONACT, whatever form that information may take, of a candidate for an activity that serves to develop his or her skills, may have the sole purpose of enabling his or her suitability for following the activity to be assessed, whether it is merely requested, proposed or pursued.

The information requested must be directly and necessarily linked to the activity. The student is requested to respond in good faith.

#### 7. Modification of these internal rules

Any modification of these internal rules shall be brought to students' attention as soon as possible.

Fontainebleau 1st July, 2020

Signature of the Director, Fonact: Laurent de Montalembert

La Jour la leuliert

DISCLAIMER: This translation of the original French document is for information purposes only. In case of any inconsistencies or discrepancies, the French original shall prevail.



# FONTAINEBLEAU S C H O O L O F A C T I N G

# DATA PROTECTION & PRIVACY NOTICE

# VERSION NUMBER: DPPN 20.2 APPROVED BY: SENIOR FONACT TEAM & LEGAL LAST REVIEWED: SEPTEMBER 2020

#### INTRODUCTION

The Fontainebleau School of Acting ("FONACT") is committed to protecting your privacy when you use any of our services. This Privacy Notice explains how we use information about you and how we protect your privacy.

If you have any concerns or questions about how we look after your personal information, please contact the administrative team at admin@fonact.com.

# **1. YOUR PERSONAL INFORMATION**

Personal information is anything that directly or indirectly identifies and relates to a living person, such as a name, address, telephone number, date of birth, unique identification number, photographs, video recordings (including CCTV) etc.

Some personal information is 'special category data' and needs more protection due to its sensitivity. This includes any information about an identifiable individual that can reveal their sexuality and sexual health, religious or philosophical beliefs, racial origin, ethnicity, physical or mental health, trade union membership, political opinion, genetic/biometric data. Personal information relating to criminal offences and convictions, although not 'special category data', is still sensitive in nature and merits higher protection.

# 2. WHY DO WE NEED YOUR PERSONAL INFORMATION?

We may need to use some information about you to:

- Contact you about our services to get your views, which helps us to manage them
- Help investigate any concerns or complaints you have about our services
- Keep track of spending on services
- Check the quality of services; and to help with research and planning of new services.



- Provision of training programmes and widening participation activities supporting recruitment to the
- training programmes
- Provision of short courses and other enterprise activities
- Advancement activities supporting the above, including marketing, fundraising and alumni support, and
- the promotion of performance events.

# 3. HOW THE LAW ALLOWS US TO USE YOUR PERSONAL INFORMATION

There are a number of legal reasons why we will need to collect and use your personal information in different circumstances. Generally, we collect and use personal information where:

- you, or your legal representative, have given consent
- you have entered into a contract with us
- it is necessary to perform our statutory duties or other legitimate purposes
- it is necessary to protect someone in an emergency
- it is required by law
- you have made your information publicly available
- it is necessary for legal cases
- it is to the benefit of society as a whole
- it is necessary to protect public health
- it is necessary for archiving, research, or statistical purposes

This privacy notice is provided in a layered format, and the link below will provide you with more detail in relation to the collection and use of personal information, for specific Fonact School activities.

- Advancement Privacy Notice
- Enterprise and Knowledge Exchange Privacy Notice
- External professionals and freelancers
- Student Privacy Notice
- Website privacy notices

If you are unable to identify any specific activity of the School or have any queries regarding any of the more detailed information provided, please contact the School [see our website fonact.com/policies for the most up-to-date details].



# 4. CONSENT

If we have consent to use your personal information for any particular reason, you have the right to remove your consent at any time. If you want to remove your consent, please contact the relevant School contact [see our website fonact.com/policies for the most up to date contact details] and tell us which service you are using, so we can deal with your request.

# UNDER 18S

If you are under 18 we will ask you to confirm that you have your parent/guardian's permission to provide this personal data and, where applicable, to engage in a contractual relationship with the School.

# 5. YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION

The law gives you a number of rights in relation to what personal information is used by the School, and how it is used. These rights are listed below, and you can ask us to:

- provide you with a copy of the personal information that we hold about you;
- correct personal information about you which you think is inaccurate;
- delete personal information about you if you think we no longer should be using it;
- stop using your personal information if you think it is wrong, until it is corrected;
- transfer your personal information to another provider in a commonly used format;
- not use automated decision-making processes to make decisions about you.

# 6. WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

In some circumstances, we use other organisations to either store personal information or use it to help deliver our services to you. Where we have these arrangements, there is always an agreement in in place to make sure that the organisation complies with data protection law.

Sometimes we have a legal duty to provide personal information to other organisations. Sometimes the sharing of data with a third party will be part of our contract with you.



We may also share your personal information when we consider/believe that there is a good reason to do so, which is more important than protecting your privacy. This doesn't happen often, but in these circumstances, we may share your information:

- to find and stop crime and fraud; or
- if there are serious risks to the public, our staff or to other professionals;
- to protect a child; or
- to protect adults who are thought to be at risk, for example if they are suffering from a mental health crisis.

For all of these reasons, the risk must be serious before we can override your right to privacy. If we are worried about your physical safety, the safety of others, or feel we need to take action to protect you or others from being harmed in other ways, we will, if possible, discuss this with you and get your permission to tell others about your situation before doing so.

If this is the case, we will make sure that we record what information we share and our reasons for doing so. We will let you know what we have done and why, if we think it is safe to do so.

# 7. HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We have a legal duty to make sure we hold your personal information (on paper and electronically) in a secure way, and to only make it available to those who have a right to see them. Examples of our security include:

- Encryption, meaning that information is hidden so that it cannot be read without special knowledge (such as a password).
- Controlling access to systems to stop people who are not allowed to view your personal information from getting access to it
- Training for our contractors to make them aware of how to handle personal information, and how and when to report when something goes wrong with mandatory data protection training for all staff before accessing the School's databases.



# 8. INFORMATION OUTSIDE OF THE EUROPEAN UNION

The majority of personal information is stored on systems in the UK or EU. However, there are some occasions where your information may leave the UK/EU either in order to get to another organisation, or where it is stored in a system outside of the EU. We have additional protections on your personal information if it leaves the UK ranging from secure ways of transferring data to ensuring we have a contract in place with that third party.

# 9. HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

We will only hold your personal information for as long as it is necessary to fulfill our legal duties or business purposes. There's often a legal reason for keeping your personal information for a set period of time, and we will include information about retention periods in the link provided above at section 3 as part of the layered format. Some data, eg the award of a degree to a named individual, will need to be kept in perpetuity.

# **10. FURTHER ADVICE?**

For independent advice about data protection, privacy and data sharing issues, you can contact the Commission Nationale de l'Informatique et des Libertés at: https://www.cnil.fr/en/home



# FONTAINEBLEAU S C H O O L O F A C T I N G

#### DISCIPLINARY PROCEDURE

VERSION NUMBER: DP20.2 APPROVED BY: SENIOR FONACT TEAM, LEGAL LAST REVIEWED: SEPTEMBER 2020

#### **1 INTRODUCTION & PURPOSE**

1.1 The School's jurisdiction under this Code is not limited to its own premises. The Code includes misconduct occurring in any place to which a student is guaranteed access by virtue of their status as a student. This would, therefore, include external engagements, placements including clinical placements, community/school experiences, and outside performances and recitals.

1.2 The Student Disciplinary Procedure is intended to provide a clearly formulated and impartial process for dealing with allegations relating to student discipline or behaviour within a reasonable timescale having due regard to the spirit of natural justice.

1.3 FONACT reserves the right to terminate attendance with immediate effect if the FONACT team deems a student unfit to complete the programme. This policy applies to all students at FONACT. The performance review process is in the best interest of staff and students to protect them throughout their time at FONACT.

#### **1.4 STUDENT PERFORMANCE**

- FONACT recognises the demands of study upon students and that an individual student at a particular time may experience difficulties. The review process is necessary to respond when a student is experiencing difficulty which may be related to health, personal, academic, professional or other challenges with the aim of providing support and advice to assist them achieve their academic and professional goals.
- This policy is intended to help the School address issues, including behaviour, giving cause for concern and to find agreed ways for the student to continue their study, to take a break, or finish their studies early. It is intended as far as possible to work in partnership with the individual student.
- If a student will not engage with necessary staff intervention, we may continue the process in their absence. In such circumstances we will always seek to protect the interests of the student and balance these with the needs of other students and staff.

# **1.5 PROCEDURES**

- This policy will apply to students experiencing difficulty which is interfering with progress on their course. This may be due to health, personal, academic, or other challenges.
- Intervention may be initiated by the student, staff or student support services. Other students will not be permitted to initiate action themselves however their concerns may result in intervention being initiated by academic staff or student support services.

# 2 GENERAL CONDUCT

2.1 The School expects students to conduct themselves at all times in an orderly manner, respecting the rights, privacy and property of others.

2.2 No student shall engage in conduct which amounts to the improper interference, in the broadest sense with the proper functioning of the School, those who work or study within it, or its reputation. Such interference will be regarded as misconduct and investigated under the disciplinary procedure below; examples of the types of behaviour that will be construed as misconduct are given in Appendix a. (The list is not intended to be exhaustive.)

2.3 Specific regulations exist with respect to accommodation, and use of School facilities and equipment. Students are required to observe these regulations. In some circumstances failure in such observance may also result in the matter being pursued under this Code at which point this Code takes precedence.

# 2.4 CONTACT DETAILS.

It is the responsibility of students to keep the School informed of their current home and term-time addresses, personal email, and mobile number at all times while they remain members of the School.

# 2.5 COMMUNICATION

The primary method of formal communication with all registered students shall be via email. It is the student's responsibility to ensure that they activate their email account registered with the School and regularly check the account for messages. Failure to check an email account regularly will not be accepted as a reason for failing to observe an instruction sent by mail.



# 2.6 ENVIRONMENT

Each student is expected to show respect for the environment by helping to ensure that the School premises are not damaged or disfigured by litter, unnecessary noise or other pollutants.

2.7 Animals are not permitted on School premises, except for guide dogs for disabled students and authorised visitors, or if required in a performance.

2.8 Furniture, equipment and other property owned or leased by the School must not be removed without proper authority. Anything moved in contravention of this regulation may be recovered without notice by authorised staff. Those responsible may be liable for recovery costs.

2.9 No student shall wilfully damage or deface, or wrongfully treat as their own, any property owned or leased by the School. A student will be required to make good in whole or in part, to the satisfaction of the School, any damage of this kind that they cause, in addition to any other penalty imposed.

2.10 No student shall wilfully damage, or wrongfully treat as their own, the property of any other person on School premises. The School accepts no responsibility for private property lost or damaged on School premises.

2.11 Members of School staff have authority to check breaches of the rules of discipline. If a member of staff feels it necessary, the member of staff may require a student, whose conduct is believed to be in breach of this Code, to withdraw from any room or facility affected by the conduct in question.

# **3 MISCONDUCT**

3.1 Improper interference, in the broadest sense, with the proper functioning or activities of the School, or with those who work or study in the School; or action which otherwise damages the School, or action that deviates from accepted institutional, professional, academic or ethical standards, will be regarded as misconduct and an infringement of these regulations.

3.2 Consistent lack of punctuality for programme activities is a matter for invoking disciplinary procedures.



3.3 In all disciplinary proceedings a student will be presumed to be innocent of the allegation or charge until the contrary is proved on the balance of probabilities.

# 4 MISCONDUCT WHICH MAY CONSTITUTE A CRIMINAL OFFENCE & RELATED MATTERS

4.1 Where alleged misconduct could also constitute an offence under the criminal law special provisions will apply and the School's own disciplinary investigations or proceedings may be delayed until such time as the police and/or courts have completed their investigations and proceedings. However, the School reserves the right to proceed with a disciplinary case where it feels it has sufficient information to do so without waiting for the completion of the police investigation.

4.2 Where a student has also been convicted and sentenced by a criminal court in respect of the same facts, the findings of the court and the penalty set will be taken into consideration at any hearing conducted by the School.

4.3 Where a student has been issued with a formal police caution, the caution will be taken into consideration at any hearing conducted by the School.

# **5 DISCIPLINARY PROCEDURE OVERVIEW**

5.1 The Director has ultimate responsibility for all matters of student discipline. The Director may delegate their powers under this Code to the Operations Office either generally or in a particular case. In the case of 'informal action' this delegation may also include the Programme Leader or Operations Office. Reference in this Code to the Director should also be read as a reference to their designated deputy.

5.2 Any complaint about the conduct of a student, whether made by a member of staff or by a member of the public, or by one student about another, shall be considered in the light of the rules laid down in this Code. However, allegations from parents, relatives or friends, on behalf of a student who chooses not to make an allegation themselves, cannot be pursued under this Code (except where the student concerned is a minor).

5.3 Where a complaint has been made, the Director may rule that it should not be subject to further action under this Code.



5.4 If the Director (or nominee) considers that action is required, they shall exercise their discretion to determine whether the formal or informal procedure is to be used. The Director's decision on how to proceed shall be final. The student will be given a copy of this Code and procedure.

5.5 If more than one student has been accused of the same or substantially similar conduct, then the authorised officer shall decide whether the cases of all or any of the students shall be investigated and/or heard together.

5.6 The School abides by the principles of natural justice and in the context of this Code, the following applies. Students will:

- be presumed to be innocent of an allegation or charge until the contrary is proved on the balance of probabilities;
- be made fully aware of the nature of allegations made against them;
- be given an opportunity to reply to any allegations and to be accompanied;
- be given a fair and unbiased hearing before a Student Disciplinary Committee, at which all relevant circumstances can be taken into account;
- have the right to appeal against any decision of the Student Disciplinary Committee which involves suspension, exclusion or expulsion.

5.7 The operation of informal procedures is underpinned by the following principle: that where allegations of misconduct are of a minor nature it is desirable to address these, where appropriate, as close as possible to the source of the alleged offence.

5.8 Informal procedures are to be used for minor acts of misconduct and the following actions can be taken:

a) Dismissal of the case.

b) Verbal warning with a requirement to desist from any further such action.

c) Written warning reprimanding the student; a copy of the warning to lie on file for the duration of the

student's period of study with a requirement to desist from any further such misconduct.

d) A fine and/or restitution of any damage caused by way of payment with a requirement to desist from any

further such misconduct.

e) Exclusion from specified activities or facilities

f) Referring the case back for formal process.



5.9 With the informal procedure the Principal may choose to delegate functions or day to day responsibilities under their authority in these matters through the Operations Office, to the relevant Programme Leader or assistant programme leader.

Complaints may be dealt with in consultation with any relevant personnel. The matter may be referred back to the Operations Office at any stage. Notes of any action taken and copies of any letters written will be lodged with the Operations Office.

5.10 A student will have 14 days from the date of the letter informing them of the outcome of the informal procedure to request to have their case considered under the formal procedures of the Student Disciplinary Committee instead.

# 6 FORMAL PROCEDURES

6.1 Formal procedures are to be used for:

a) Repetition of minor acts of misconduct.

b) Where informal action has failed or is considered inappropriate.

c) For serious allegations.

6.2 Such misconduct may be subject to any of the following measures as ordered by the Student Disciplinary Committee:

a) Dismissal of the case.

b) Verbal warning with a requirement to desist from any further such action.

c) Written warning/reprimanding the student; a copy of the warning to lie on file for the duration of the student's period of study with a requirement to desist from any further such misconduct.

d) Final written warning which will remain on the student's file until they have finished their studies at the School.

e) A fine and/or restitution of any damage caused by way of payment with a requirement to desist from any further such misconduct.

f) Suspension where this is defined as a temporary prohibition on attendance.

g) Exclusion where there is a partial or selective prohibition on access to School facilities.

h) Expulsion (this will be noted permanently on the student record, and will be given as the reason for withdrawal on any transcript or status letter or similar).



6.3 The Committee will have the absolute discretion to determine the appropriate measure(s) but in arriving at its decision will consider the following:

- The nature of the offence, and its impact on any victims (where relevant)
- The level of intent
- The consequences of the penalty on the student
- The level of insight and responsibility shown by the student in respect of their actions
- Any previous record of misconduct
- The tariff guidelines (see appendix c) Mitigating or extenuating circumstances.

# 7 ACTION & INVESTIGATION

7.1 The Director shall rely on the Operations Office to instigate action either directly or through an authorised officer.

7.2 In the circumstances of an allegation the Operations Office will require a written statement of the allegation from the complainant(s) with any evidence or corroboration available. A police caution will be accepted as corroboration. This should also include a statement of desired outcomes where possible and where appropriate.

7.3 The Operations Office shall provide written information to those who are the subject of the allegation – of its nature and the anticipated timescale for investigation.

7.4 The Operations Office will instigate an investigation of the allegation, securing further evidence where this is possible.

7.5 They shall be entitled to call for such evidence in writing from any relevant party or examine any witnesses to the alleged events.

7.6 If there is no corroborative evidence to the initial complaint then the Operations Office will advise all concerned, in writing, of the insecurity of the allegation and the complaint will terminate. All records of the case will be destroyed.

7.7 Where corroboration is available, the Operations Office, or authorised officer, will either:

(i) for a minor offence, utilise the informal procedures or

(ii) require the student to attend a meeting of the Student Disciplinary Committee.



# 8 STUDENT DISCIPLINARY COMMITTEE

8.1 The student against whom an allegation is made for which there is corroboration available will be advised in writing of the case against them and provided with details of all evidence acquired (a report from the Operations Office). This will be provided before the Student Disciplinary Committee meets.

8.2 The student will be informed of their rights to be heard at a meeting of the Committee and to be accompanied by a friend. The name of the friend will be notified in advance to the Operations Office.

8.3 The student will be advised of the procedures of the Committee including the calling of witnesses in support of either the allegation or the student and the consideration of any written statements/documentation from the student. Where the student provides a written statement/documentation this will be submitted to the Operations Office at least three days before the meeting to enable proper consideration.

8.4 The Operations Office will be responsible for convening the meeting of the Student Disciplinary Committee. The Committee shall normally consist of the following:

- A member of the Senior Teaching Team (in the Chair)
- A member of the teaching staff not drawn from the student's department and who is independent of the case
- A member of the Operations Team
- A secretary to the Panel will also be appointed.

8.5 The Committee will require attendance of the student against whom the allegation has been made (together with any friend), with any witnesses as necessary. However, none of the proceedings outlined in this code and procedure will be invalidated or postponed by reason of the absence of the student provided that the student has been given written notice of the interview or hearing.

8.6 A formal record will be kept of all Disciplinary Committee business.

8.7 At the meeting, the Committee will interview the student, receive a report of the event(s) from the Operations Office and any evidence available and hear the response of, and receive, any written submission from the student.



8.8 The Student Disciplinary Committee will first determine the facts of the case and whether there has been a breach of the Student Code of Conduct. The Student Disciplinary Committee will then consider, where relevant, any contextual information or mitigating circumstances. The student and their friend and any witnesses may be asked to leave the room between these two stages of the proceedings. The Student Disciplinary Committee may exercise its discretion to adjourn the hearing at any time (for up to one week) if it feels the need to verify a fact or summon additional witnesses.

8.9 The Student Disciplinary Committee will inform the student of its findings and, where relevant, its order. Any order, or orders, will be chosen from the list in paragraph 6.2 (with regard to 6.3 and the tariff guidelines in appendix c). The Committee will make its decision known to the student in writing within three working days of the conclusion of the hearing.

8.10 The records of the case of a student against whom charges have been proven are normally entered on the student's record.

8.11 If the case is dismissed all records of the case will be absolutely and unconditionally destroyed after a period of 6 months.

8.12 All proceedings shall be recorded but remain confidential, but the findings and order where relevant of the Committee shall be publicised.

8.13 The Committee shall conduct its business in accordance with a procedure which shall accord with principles of natural justice, but it is not required to observe formal rules of evidence. It shall be recorded whether or not any decision reached has been unanimous and it shall be announced if a decision is not unanimous.

8.14 The student shall have the right of appeal to the Student Disciplinary Appeal Panel against any decision which involves suspension or exclusion or expulsion. This right of appeal does not apply to any suspension/exclusion/expulsion carried out in advance of the meeting of the Student Disciplinary Committee.

8.15 There is no right of appeal on any other decision of the Student Disciplinary Committee.



# 9 STUDENT DISCIPLINARY APPEAL COMMITTEE

9.1 If a student wishes to appeal against the decision of the Student Disciplinary Committee to suspend/exclude or expel, they must lodge that appeal, in writing, with the Operations Office within 5 working days of the issuing of the Committee's decision. The grounds for the appeal must be clearly stated; the student should indicate whether they are appealing against the finding of fact or the order issued or both, and demonstrate with supporting documentation that one or both of the criteria for appeal (see 9.2) apply.

9.2 The Operations Office will refer the matter to the School Director (or their nominee) who will allow an appeal to be heard if they are satisfied that there is a prima facie case that either or both of the following criteria apply:

i) that there is new evidence that could not have been, or for good reason was not, made available at the time of the hearing;

ii) that evidence can be produced of significant procedural error on the part of the School before or during the hearing.

9.3 A Student Disciplinary Appeal Committee shall where possible be constituted to hear the appeal within 10 working days of the receipt of the appeal.

9.4 The Appeal Committee shall consist of:

- The Director or nominee (in the Chair)
- An associate director or a member of staff from the operations team
- A member of staff or student unconnected to the case nominated by the Chair.

The quorum for the Appeal committee shall be three. A secretary to the Appeal Committee shall be appointed by the Chair.

9.5 The Appeal Committee shall make no further enquiry into matters of fact relating to the allegation and the evidence, unless new evidence is forthcoming that could not have been, or for good reason was not, made available at the time of the original hearing. They shall have access to the full documentation on the case.

9.6 The appellant will be informed of their rights to be heard at a meeting of the Appeal Committee and to be accompanied by a friend. The name of such friend will be notified in advance to the secretary to the Appeal Committee.



9.7 The Appeal Committee shall hear the appeal as follows:

a) The Chair of the Disciplinary Committee, the appellant and any witnesses as the Appeal Committee considers appropriate will present the report of the Student Disciplinary Committee which will include a summary of process, evidence, and conclusions and decisions together with all papers associated with the case;

b) The appellant (and/or friend) will have the opportunity to address the Appeal Committee in support of the grounds for appeal;

c) Members of the Appeal Committee will be able to question the Chair of the Disciplinary Committee and the appellant;

d) In addition, the Appeal Committee may call any member of staff as a witness to clarify or provide advice on an issue.

e) The Chair of the Disciplinary Committee will then sum up;

f) The appellant will then sum up;

g) The Chair of the Disciplinary Committee and the appellant will then leave the room.

9.8 The Committee will require the attendance of the appellant (together with any friend). However, none of the appeal proceedings will be invalidated or postponed by reason of the absence of the appellant provided that the hearing takes place within the published timescale and the appellant has been given five working days' notice of the date and time of the hearing. The Appeal Committee may exercise its discretion to adjourn the hearing at any time.

9.9 The Appeal Committee will deliberate on the appeal and come to a decision. The Appeal Committee may reject the appeal or uphold the appeal. Where the Appeal Committee upholds the appeal, the Committee may order one or more of the following measures:

i) modify or reverse the finding of the Disciplinary Committee;

ii) modify or reverse the order of the Disciplinary Committee. The decision of the Appeal Committee shall be final.

9.10 The decision of the Appeal Committee shall be communicated to the appellant, in writing, within three working days of having been made.

9.11 The Appeal Committee shall have absolute discretion to regulate its own procedures, subject to keeping within the spirit of this procedure, with power to vary or adapt its procedures.



# APPENDIX A: EXAMPLES OF BREACHES OF THE CODE OF CONDUCT

The following exemplifies the behaviour and conduct which would constitute a breach of the Student Code of Conduct, although not exclusively:

a) Disruption of the academic, administrative, recreational, social, or other activities of the School.

b) Obstruction of the functions, duties or activities of any student, member of staff or other employee of the School or any authorised visitor to the School.

c) Behaviour which restricts the legitimate freedom of speech, ideas, actions, or inquiry of any other student or member of staff.

d) Behaviour which is in breach of School regulations on health and safety, smoking, or eating and drinking on School premises.

e) Behaviour which brings the School into disrepute – including antisocial behaviour in and around the student residence.

f) Violent, indecent, disorderly, threatening or offensive behaviour or language whilst on School premises or engaged in any School activity.

g) Malicious damage to School property which includes inter alia, the hall of residence, School managed property, Students' Union property or the property of any student, member of staff or visitor.

h) Conduct, including the possession or use of drugs or other illegal substance, which constitutes a criminal offence, where that conduct:

a) took place on School or School managed property, or

b) affected or concerned other members of the School community, individuals or groups in related School organisations or partner institutions and organisations, or

c) damages the good name of the School, or

d) is an offence of dishonesty, where the student holds an office of responsibility in the School, or

e) poses a danger to other members, or to the good order, of the School community.



a) Any breach of the School's Equal Opportunities Policy including sexist, racist or homophobic activity or behaviour.

b) Any form of harassment, including the racial, sexual or religious harassment of any student, member of staff or other employee of the School or any visitor to the School.

c) Behaviour which would be likely to cause fear, distress or offence to others.

d) Failure to comply with the written policies and directions, including attendance, punctuality, tuition and compliance with academic work.

e) Theft, fraud, deceit, deception or dishonesty in relation to the activities/documents of the School or the property of the School or its staff or other students of the School.

f) Failure to follow a reasonable instruction from a School officer, including failure to disclose your name and other relevant details in circumstances when it is reasonable to require that such information be given.

g) Failure to comply with a previously imposed penalty under this Code or other School regulation.



# FONTAINEBLEAU S C H O O L O F A C T I N G

DISCRIMINATION, HARASSMENT, BULLYING & SEXUAL MISCONDUCT POLICY

VERSION NUMBER: PDHBSM 20.2 APPROVED BY: SENIOR FONACT TEAM, WELLBEING TEAM & LEGAL LAST REVIEWED: SEPTEMBER 2020

#### INTRODUCTION

1. FONACT does not tolerate any form of victimisation, discrimination, harassment, or sexual misconduct under any circumstances, and insists that all members of the FONACT community, including staff, students, visitors and contractors, treat each other with respect, courtesy and consideration.

2. FONACT is committed to maintaining an inclusive culture which promotes equality, values diversity and maintains a holistic and supportive environment which respects the rights and dignity of all members of the Fonact community, across working, learning and social spheres.

3. FONACT takes allegations of harassment and sexual misconduct very seriously and may take action, including disciplinary action, in response to a complaint from a student.

#### STAFF REFERENCES

**DIRECTORS:** Laurent de Montalembert, Lucinda Millward, Christian Burgess

**OPERATIONS:** Leila Murat, Lucy Degos

**WELLBEING:** Diane LeMaire, Cécile Gillot



# AIMS

The aims of this policy are to:

- Promote a positive, supportive and inclusive environment in which people are treated with respect and consideration;
- Outline FONACT's zero-tolerance towards any form of harassment, and that all members of the FONACT community are responsible for maintaining and fostering a harassment-free environment;
- Provide a framework of support for students who feel they have been subject to harassment;
- Inform students where and how to make a complaint.

# DEFINITIONS

A person subjects another to discrimination and harassment where they engage in unwanted and unwarranted conduct which has the purpose or effect of:

- Violating another person's dignity, or
- Creating an intimidating, hostile, degrading, humiliating or offensive environment for another person. The recipient does not need to have explicitly stated that the behaviour was unwanted.

2. Bullying is a form of harassment and may be characterised as offensive, intimidating, malicious, or insulting behaviour, or a misuse of power through means intended to undermine, humiliate, denigrate or injure the recipient.

3. Victimisation is when one individual treats another badly or subjects him/her/them to a detriment because of a complaint about discrimination, harassment or bullying or have participated in an investigation, or because they have helped someone who has been a victim of discrimination, harassment or bullying. FONACT regards victimisation as misconduct.

# BEHAVIOURS

4. Under this Code of Conduct unacceptable behaviour, whether intentional or not, can take a variety of different forms. The following descriptions are not exhaustive, but give an indication of the types of behaviour which the School considers to be unacceptable:

• Making sexually offensive comments about dress or appearance, the display or distribution of sexually explicit material, or demands for sexual favours;



- Engaging in harassment on the grounds of a person's sexuality (or assumptions about a person's sexuality) including making derogatory homophobic, transphobic, or bi-phobic remarks or jokes aimed at a particular person, offensive comments relating to a person's sexuality, refusal to acknowledge a person's gender or identity, or threats to disclose a person's sexuality to others;
- Making offensive references to a person's race, ethnicity, skin colour, religion or nationality, dress, culture, background or customs which have the effect of ridiculing or undermining an individual or fostering hatred and/or prejudice towards individuals or particular groups;
- Ignoring, disparaging, or ridiculing a person because of mistaken assumptions about their capabilities, or making offensive reference to an individual's appearance, in the context of their disability;
- Controlling or coercive behaviour, such as pressure to subscribe to a particular political or religious belief;
- Offensive gestures, language, gossip or jokes;
- Insulting or abusive behaviour or comments;
- Display of sexually aggressive, pornographic, racist or otherwise offensive pictures or other material, or the transmitting of any such messages or images via e-mail or instant messaging;
- Intentional isolation or exclusion;
- Humiliating or demeaning behaviour and/or persistent criticism.

5. Online harassment may take the form of intimidating, offensive, or graphic posts on social media sites or chat rooms, or communications by email, text, or instant messaging.

6. Sexual misconduct includes the following, whether or not within a sexual or romantic relationship, including where consent to some form of sexual activity has been given and then withdrawn, or if consent has been given on previous occasions:

- Sexual intercourse or engaging in a sexual act without consent;
- Attempting to engage in sexual intercourse or engaging in a sexual act without consent; sharing private
- sexual materials of another person without consent;
- Kissing without consent;
- Touching inappropriately through clothes without consent;
- Inappropriately showing sexual organs to another person;
- Repeatedly following another person without good reason;
- Making unwanted remarks of a sexual nature.



7. Harassment can be defined by multiple, repeated forms of unwanted and unwarranted behaviour, as well as a one-off incident.

8. It is critical that every member of staff and student understands the definition of harassment. The perception of the complainant and the extent to which that perception is, in all the circumstances reasonable, will be relevant.

9. Being under the influence of alcohol, drugs or otherwise intoxicated is not an excuse for harassment under any circumstances.

10. Discrimination and Harassment may be verbal, psychological, or physical, in person or via a virtual platform, or through other methods of contact. Discrimination or harassment may occur in the course of an academic, sporting, social, cultural, or other activity either within the School or elsewhere in the context of a person's membership of the School, or in circumstances where the victim of the harassment is a member, officer, or contractor of the School. Through a prevailing workplace or study environment which creates a culture which tolerates harassment or bullying, for example the telling of homophobic, sexist or racist jokes.

11. Stalking is also considered a form of harassment, and may be characterised by any of the following repeated, and unwanted behaviours:

- Following a person;
- Persistent contacting, or attempting to contact, a person by any means;
- Publishing any statement or other material relating or purporting to relate to a person; or purporting to originate from a person;
- Monitoring the use by a person of the internet, email or any other form of electronic communication;
- Interfering with any property in the possession of a person;
- Watching or spying on a person, including through the use of CCTV or electronic surveillance.

# APPLICATION OF THE POLICY

12. FONACT considers that discussion and debate is proper and acceptable in the academic context, and staff and students have freedom within the law to voice a wide range of views and opinions on social, economic, political, cultural and religious issues, and to express new discussions that may be considered controversial or unpopular opinions. However, such freedoms do not provide immunity from the law nor personal liability.



Academic debate must be conducted respectfully so as not to amount to harassment, and shall not violate the dignity of others to create an intimidating, hostile, degrading, humiliating or offensive environment for them.

13. Harassment and/or bullying or sexual misconduct is a serious offence. Any student who feels she/he/they have been subject to harassment or bullying, or believe that they have been the subject of sexual misconduct by another student or staff member, should make a complaint to the relevant class Director where their complaint is against a member of the student body. Where the complaint is against a member of staff the complaint should be made to the Student delegate or Administration office, who will bring it to the Head of Operations and School Director. FONACT strives to create a supportive and transparent culture, and therefore, should the student feel uncomfortable approaching either of the above points of help, they can expect to receive support from any staff member. For advice, a student can speak in confidence to any member of the staff body.

14. Where a complaint of harassment, bullying or sexual misconduct may constitute a criminal offence, the complainant will be encouraged to report the matter to the police. However, FONACT does not enforce any requirements for a complainant to report the matter to the police. Fonact will only report the matter to the police directly where failure to do so may be against the public interest or against the interest of the Fonact community. (eg. there is a risk to others).

15. If a complainant is deemed to have known or to have reasonably been expected to know that a complaint was unfounded, the allegation of harassment or bullying may be judged to be vexatious or malicious, and disciplinary action may be taken against them. No action will be taken if a complaint which proves to be unfounded is judged to have been made in good faith.

16. All parties involved in a complaint (including any witnesses who may be interviewed as part of any investigation) should maintain the confidentiality of the process. Those involved in advising complainants should, where possible, seek the consent of the individual for onward disclosure of relevant information to those with a clear need to know. Where such consent is not forthcoming, the person entrusted with the information should make it clear that, in exceptional circumstances, it may be necessary to disclose the information, taking account of the duty of care which may be owed to the individual and/or others.



# FONTAINEBLEAU S C H O O L O F A C T I N G

# SAFE SPACE, HEALTH & WELLBEING

POLICY

# VERSION NUMBER : PSSHW 20.2 APPROVED BY : SENIOR FONACT TEAM, WELLBEING TEAM & LEGAL LAST REVIEWED : AUGUST 2020

We want Fonact to be a place where creativity is free. Where both staff and students feel confident to be bold and brave in their work. A place where we can explore, take risks, push boundaries. We want to give ourselves freely to our work, and collaborate professionally at the highest level.

We know that for this to happen, Fonact must be a safe space. Inside rehearsal rooms, practice rooms, theatres, concert halls, in and around our buildings and online, our space must always be and feel, safe. Safe for students and for staff. Trust, openness and freedom of expression are essential.

We acknowledge there can be a specific and subtle power dynamic between staff and students in an arts Conservatoire like ours, due to the nature of the work, and perceptions around individual casting.

We acknowledge that despite clear and robust policies, students may feel they are not able to speak freely. Out of fear of appearing to resist the bold and exploratory nature of the work, for fear of being 'difficult', for fear of it adversely affecting their casting in projects and productions.

We know this has the potential to lead to blurred boundaries, and a space that isn't safe.

The purpose of this document is to protect and empower students, staff and freelance creatives. It is to say we will do everything we can to make Fonact a safe space for all.

From us, to you. From staff, to students. We want you to speak. We will listen. We will act.



#### WE ACKNOWLEDGE OUR POWER

We acknowledge there is a possibility you will find it difficult to speak out against something you feel could be inappropriate.

We acknowledge this fear can be bound up with insecurities around your own understanding of the work, your relationships with teachers you admire, your future opportunities with regards to casting in projects and productions.

Whilst we will do everything we can to create an open and transparent culture, we know this can be true however approachable, rigorous, generous and supportive we are as a teaching body.

# WE ACKNOWLEDGE THE NATURE OF THE WORK

We all want the work to be open, free, heartfelt, passionate, and brave.

We know there will be times in your training where you will feel uncomfortable. Moving outside your comfort zones is an important part of your work, and we ask you to work with courage. The work often tackles difficult and emotive subject matter, and our job is to explore all sides of the human condition.

We are all excited by brave work, but we know this can sometimes create a feeling of confusion when it comes to boundaries.

Freedom needs trust. If you ever feel something is not ok, we want you to say so. Your boundaries are not your talent.

We want you to speak out if you feel something is inappropriate.

If ever you feel something is 'not ok', inappropriate or wrong we want you to say so. We want to create an environment, ethos, atmosphere at Fonact where this is an absolute given. We want you to feel you can talk to us, that we are approachable and supportive. And we want you to know that if ever you come to us, whatever it is, we will hear you.

# WHO CAN YOU SPEAK TO?

In the first instance we encourage you to speak to the teacher or director leading the session. To speak to the person involved helps to keep our space safe, as it fosters an open and transparent community. We know, however, there might be occasions where you don't feel comfortable speaking directly to the individual involved. In this case it's best to speak to your student delegate or Director involved.



If, for any reason, you are not comfortable speaking to either of these people, then you can speak to any member of staff. That member of staff will hear you, and take the issue to the Operations team or Director of Acting.

#### WHAT CAN WE DO TO KEEP OUR SPACE SAFE?

We will explore everything set out in this document with you at the beginning of your year, with core staff, where we explore our relationship with the work, our ethos and our values. We will create a living culture where boundaries are acknowledged and respected. We will explore different ways in which we can feel uncomfortable. We will feel clear with our own boundaries. We will give ourselves confidence.

We will induct any freelance director or creative thoroughly into this Code of Ethos at a face-to-face meeting, and ensure they have read our policies on harassment, bullying, victimisation, staff-student relationships, equality and diversity.

We will ensure that the Equity Safe Space statement is read out by the director on the first day of rehearsals, as standard practice.

As a staff body, we will take part in regular workshops ourselves around inclusion and sensitivity. We commit to creating an outward looking culture able to respond to what is happening in the world.

We will regularly review this document and its effect on our living culture, consulting with students, core staff, freelance staff and graduates.

We can only push our creative boundaries and make exciting work if we are safe to do so. We hope this Safe Space Policy will help us all to create an environment where we can express ourselves freely, both in, and outside of the work. A space where the rigour of our work and the protection of our dignity can sit side by side. A space that is open, brave, curious, provocative, and alive. A space that is safe.

# HEALTH, SAFETY AND WELLBEING

FONACT's utmost priority is to ensure a healthy and safe environment for its students. In this perspective, FONACT takes very seriously any physical or mental health issues that any student may need to address. Any student that may be confronted with any issue of this kind is encouraged to share it with the staff body who will assist the student and contact medical professionals if necessary.

# POLICIES

Fonact has clear policies covering harassment, bullying, victimisation, staff-student relationships, equality and diversity. All these are on the main school website, and can be found at http://www.fonact.com/policies.



# FONTAINEBLEAU S C H O O L O F A C T I N G

# RELATIONSHIPS BETWEEN STAFF & STUDENTS POLICY

#### VERSION NUMBER: PRSS 20.2 APPROVED BY: SENIOR FONACT TEAM, WELLBEING TEAM, HR & LEGAL LAST REVIEWED: SEPTEMBER 2020

1. FONACT believes the professional relationship between a student and a member of staff is a critical part of the student's educational development. In this context, the professional relationship is defined as one in which there is an assessing, teaching, tutoring, supervising or pastoral role, or where administrative or technical support is provided. It includes all Fonact contracted staff in contact with the students.

2. Staff have a professional duty to develop their students' abilities while maintaining responsibility to safeguard students' welfare, and FONACT places importance on the essential relationship of trust and confidence between staff and students. The staff duty covers all school-related activities, wherever they are conducted.

3. It is equally important that a personal relationship between a member of staff and a student neither adversely affects the learning environment for other students, nor prejudices the provision of equality of treatment for all students.

4. Whilst FONACT acknowledges that staff and students potentially may be involved in business and/or financial relationships, the school strongly advise staff not to enter into such a relationship if it could compromise or be seen to compromise either party.

5. FONACT acknowledges that staff are in a position of authority over students and therefore the relationship is not an equal one. Under no circumstances should a member of staff abuse their position of trust and power by entering into a sexual or romantic relationship with a student or by encouraging such a relationship. FONACT regards it as unprofessional for any staff member to initiate or pursue such a relationship, without any regard to the problem which may ensue.

6. If a member of staff believes a relationship or attraction may be developing, or if there is a danger of such relationship developing, they must inform the school Director and Admin. As a result, teaching, tutoring or assessment arrangements, or any other activity which may affect equality of treatment of students, can be adjusted and monitored appropriately and where necessary. This is for both protection of staff and student. Directors reserve the right to ensure separation of parties, where possible, in all activities associated with teaching, learning and assessment.



7. The Director will meet with the individual(s) concerned to agree the course of action. If agreement cannot be reached, the matter will be considered by senior staff members for resolution/decision.

8. All disclosures and information will be treated as confidential, unless otherwise agreed by all parties involved, or there is a legal obligation for Fonact to disclose such information. A note of any agreed action will be placed on the individual's file.

9. It is the responsibility of the Director to detect what may be a violation of this policy, to investigate promptly, and to take appropriate or disciplinary action. In deciding their action, the Director should consult with the Head of Operations.

10. Students must note that if a professional relationship between a member of staff and a student, as defined as above, is compromised or breached in any way as outlined in this policy, disciplinary action may be invoked against either individual, including sanctions up to and including dismissal.

11. Staff or students who have any concerns regarding the development or existence of a relationship between a member of staff and a student should contact the Student delegate or Admin.

12. Staff or students should not accept unwanted attention or harassment from any other student or member of staff. Any concerns regarding sexual misconduct or harassment should be reported to their Director, Student delegate, or Admin.

13. In the event that a member of senior staff has, or has had a close relationship with a student whose results are being considered at a meeting, the individual must declare a conflict of interest at the beginning of the meeting, and as a result, exclude himself/herself/themselves from any discussion or decision-making in respect of that student. Close relationship constitutes as familial, business, financial or of a sexual/romantic nature.



FONTAINEBLEAU S C H O O L O F A C T I N G

# WEBSITE PRIVACY NOTICE POLICY

VERSION NUMBER: WPN20.2 APPROVED BY: SENIOR FONACT TEAM, LEGAL LAST REVIEWED: SEPTEMBER 2020

#### INTRODUCTION

This specific privacy notice covers activities relating to the provision of the following web domain, www.fonact.com. It is sub-layer of the School's overarching privacy notice found at www.fonact.com/policies. The collection of personal data for other purposes is covered elsewhere.

The Fontainebleau School of Acting is committed to protecting your privacy; this privacy notice explains how we use information about you and how we protect your privacy. If you have any concerns or questions about how the School looks after your personal information please contact the Administrative Team at admin@fonact.com.

We may collect the following information:

- Name
- Contact information including email address
- Demographic information, such as postcode
- Website usage data
- Other relevant information relating to student enquiries
- Other information pertaining to surveys.

# HOW WE USE THIS DATA

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- Internal record keeping
- We may use the information to improve our products and services.
- We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.
- From time to time, we may also use your information to contact you for market research purposes. We may contact you by email and we may use the information to customise the website according to your interests.



#### SECURITY

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

#### **CONTROLLING INFORMATION ABOUT YOU**

When you fill in a form or provide your details on our website, you will see one or more tick boxes allowing you to opt-in to receive marketing communications from us by email. If you have agreed that we can use your information for marketing purposes, you can change your mind easily, via email: admin@fonact.com.

We will never lease, distribute or sell your personal information to third parties. Any information we have about you is stored and processed under our data protection policy, in line with the Data Protection Act 1998.

#### **HOW WE USE COOKIES**

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

#### LINKS TO OTHER WEBSITES

Our website may contain links to other websites of interest. However, once you have used these links, you should note that we do not have any control whatsoever over that other website. Therefore, we cannot be responsible for the content on those websites nor the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by our privacy policy. You should exercise extreme caution as to the content on those sites and also look at the privacy statement applicable to the website in question.



#### YOUR CONSENT

By using our site, you consent to our website cookie policy (unless you disable cookies). We will not collect personal data unless you actively provide that to us which you may only do if you consent to the GDPR compliant privacy policy we enforce.

#### SECURITY

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online.

#### SENSITIVE INFORMATION

When using or subscribing to our services, you may choose to provide us with information which is defined as sensitive personal information in the Data Protection Act 2018. Examples of sensitive information include details of your ethnicity or state of health. As with all of the personal information which you provide to us, we shall use and store this information carefully in accordance with this privacy policy.

