

## **Grape Secrets Policies and Procedures**

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- Conflict of Interest
- Reasonable Adjustments
- Special Consideration
- Diversity and Equality
- Malpractice and Maladministration
- Privacy and Data Protection
- Cancellations and Refunds

### **Complaints and Appeals**

Grape Secrets is committed to providing the highest standards of service as a representative of WSET and course provider. However, if the service provided does not meet your expectations and you are dissatisfied with the Grape Secrets course delivery or process of conducting examinations, please do not hesitate to raise your concerns using one of the following channels:

- Send us a formal written email detailing your complaint to [info@grapesecrets.com](mailto:info@grapesecrets.com)
- Speak to a member of the team (+971 55 233 1149)
- Request an appointment by email to meet one of the team in person

Please note that for Grape Secrets to investigate your concerns, complainants must provide:

- Full name, address and contact details
- Details of the complaint (with supporting documentation if applicable)
- Details of any previous attempts to resolve the issue

On receipt of your complaint and supporting details, you will receive a notification of acknowledgement from the Grape Secrets team within three (3) working days. We endeavor to investigate your complaint in a thorough and professional manner and a full detailed response will be sent to you within three (3) weeks from initial acknowledgement.

Should the response not satisfy you, then we would ask you to email an appeal to Nuria Frau-Trullen at [nuriafrau-trullen@googlemail.com](mailto:nuriafrau-trullen@googlemail.com). A full review will be conducted with a response issued within two (2) weeks from receipt of the appeal.

If the complaint is still not resolved after receipt of response to the appeal, a complaint may be filed with WSET by emailing WSET's Quality Assurance Team at [QA@wsetglobal.com](mailto:QA@wsetglobal.com).

All complaints will be treated with the strictest confidence and will not prejudice the faculty or examination result of the complainant.

### **Conflict of Interest Policy**

As an Approved Program Provider (APP) Grape Secrets is required to identify to WSET and assist in managing or monitoring actual, potential, and perceived conflicts of interest ('Conflicts of Interest') involving both APP staff and students. This policy complements WSET's conflicts of interest policy and works to safeguard the integrity of WSET qualifications and promote confidence in WSET and Grape Secrets processes and procedures.

This policy applies to all Grape Secrets staff and students and to any individual acting on behalf of Grape Secrets

A Conflict of Interest exists where an individual has interests or loyalties that could adversely influence their judgement, objectivity, or loyalty to WSET or Grape Secrets when conducting activities associated with WSET qualifications.

### **Reasonable Adjustments Policy**

Both WSET and Grape Secrets want to make WSET assessments accessible for all students, so none are at an advantage or disadvantage based on a disability or differing ability. This policy and the reasonable adjustment process allows us Grape Secrets to work with you, our student, before an assessment to gather the information we need to submit a request to WSET and work with them to make arrangements that give students access to WSET qualifications.

A reasonable adjustment is any accommodation or arrangement that helps to reduce the effect of a known disability or difficulty that substantially disadvantages a student's assessment. Using a reasonable adjustment does not impact how WSET grades your exam, or your result, but WSET cannot agree to reasonable adjustments where your particular difficulty directly affects performance necessary to complete the assessment outcomes (e.g. inability to smell or taste for a Level 3 Exam). The goal of a reasonable adjustment is to give you equal access to a WSET qualification, not to give unfair advantages over other students who take an assessment without the same adjustment, or to affect the overall reliability of the assessment outcomes that are explained in the course Specification.

Examples of reasonable adjustments may be:

- 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-organizing the assessment room, such as removal of visual stimuli for an autistic candidate.

### **How to apply for Reasonable Adjustments**

Grape Secrets will gather the information we need from you to submit a Reasonable Adjustment Application form to WSET. WSET must approve and arrange reasonable adjustments before the assessment activity takes place. Before completing enrolment with Grape Secrets, we will give all students access to this policy and the chance to identify any special needs that could require a reasonable adjustment. If a student identifies a special need, Grape Secrets will give the student the Reasonable Adjustment Application form as soon as possible and work with the student to gather the necessary information.

For any student seeking a reasonable adjustment, please contact Grape Secret at [info@grapesecrets.me](mailto:info@grapesecrets.me) with:

- Your full name;
- contact information;
- description of the special need, disability or differing ability that requires an adjustment; and
- supporting documentation.

You must submit this information at least 15 days before the exam date for Levels 1-3 qualifications. The information you submit will be shared with WSET and will be handled under WSET's Privacy and Data Protection Policy.

Grape Secrets will keep records of all reasonable adjustment applications.

### **Special Considerations Policy**

Special consideration is any adjustment given to a student who has temporarily experienced an illness or injury, or other event outside of their control at the time of the exam that significantly affects their ability to take the exam or their ability to show their knowledge and understanding in the assessment. Special consideration is only for things that happen immediately before or during an exam that have a material impact on your, the student's, ability to take the exam or on your performance.

To be eligible for special consideration, you must have completed the whole course and would have been fully prepared if not for the temporary illness, injury, or other uncontrollable event. A special consideration may be for an individual (e.g. a student becomes ill the day of the exam) or a group of students (e.g. an exam is interrupted by a natural disaster).

You may be eligible for special consideration if:

- Your performance on the exam is adversely affected by an event outside of your control. This may include temporary illness, temporary injury, bereavement, or exam room conditions.

- Reasonable adjustments which were agreed in advance of the exam proved inappropriate or inadequate.
- The application of special consideration would not make a passing result and certificate misleading about the student's ability to satisfy the qualification's assessment criteria.

### **How to apply for Special Consideration Policy**

If you have taken an exam, or your exam is immediately approaching, and you feel that you have a temporary injury or illness, or other uncontrollable event that has interfered with your ability to complete your exam, please contact Nuria Frau Trullen at [info@grapesecrets.me](mailto:info@grapesecrets.me) or 0502331149 as soon as possible. Grape Secrets will provide you with a Special Consideration

Application Form, which must be completed and returned with supporting documentation within 5 working days after the effected exam. The information you submit will be shared with WSET and will be handled under WSET's Privacy and Data Protection Policy.

If there has been serious disruption during an exam affecting a group of students, Grape Secrets will submit a detailed report of the circumstances and candidates affected to WSET to request a special consideration.

Grape Secrets will keep records of all applications for Special Consideration.

### **Diversity and Equality Policy**

Grape Secrets promotes equal opportunities and shall exercise no discrimination on the grounds of political opinion, age, color, disability, ethnic or national origin, gender, marital status, race, religion, or sexual orientation in the admission of students or the appointment of staff or the awarding of any Degree, Diploma, or Certificate. Students who believe they may have been unfairly discriminated should raise this with Grape Secrets concerned in the first instance.

Please do not hesitate to raise your concerns using one of the following channels:

- Send us a formal written email detailing your complaint to [info@grapesecrets.com](mailto:info@grapesecrets.com)
- Speak to a member of the team (+971 55 233 1149)
- Request an appointment by email to meet one of the team in person

Any candidate who has a concern that actions of an individual connected to the delivery of WSET qualifications is against the WSET code of conduct can report their concern to [QA@wsetglobal.com](mailto:QA@wsetglobal.com)

## **Malpractice and Maladministration Policy**

Both Grape Secrets and WSET have policies and procedures in place to protect WSET students and safeguard the integrity of WSET qualifications. Grape Secret ensures compliance with Grape Secret's and WSET's policies through this Malpractice and Maladministration Policy, which gives a framework for both us and you to identify, report and manage potential malpractice or maladministration.

Non-compliance with Grape Secrets or WSET Policies and Procedures can fall into two distinct, but related, categories:

1. **Maladministration**, where the non-compliance is generally unintentional, or the result of mistakes, carelessness, inexperience or poor processes; and
2. **Malpractice** where the non-compliance is intentional or the result of a negligent or reckless action without consideration of the consequences of the action.

Context is important and the line between maladministration or malpractice is not always clear: for example, maladministration incidents may become malpractice (e.g. if you fail to implement corrective measures, repeat the same or similar incident, or attempt to misrepresent or hide information during an investigation); or there may be mitigating factors that turn potential malpractice into maladministration. Though malpractice and maladministration are distinct concepts, they can shade into one another. Malpractice and maladministration are always case, context and fact specific. Both APPs and students can commit malpractice and maladministration.

There are many ways that malpractice or maladministration could occur, including new ways we have not seen yet. But some examples of malpractice or maladministration include:

For APPs:

- Failure to adhere to WSET Policies and Procedures;
- Failure to follow WSET requirements for course delivery or exam regulations;
- Failure to follow WSET's candidate registration and certification procedures;
- Late student registrations;
- Fraudulent claim for certificates/fraudulent use of certificates/reproduction or forgery of certificates;
- Withholding critical information from WSET quality assurance;
- Insecure storage of exam materials;
- Revealing or sharing confidential exam materials with candidates ahead of an exam;
- Intentional attempts to manipulate exam results so that they do not reflect the candidate's actual exam performance;
- Failure to disclose a Conflict of Interest;

- Issue of incorrect exam results/failure to issue results to students in a timely manner;
- Failure to timely respond to WSET;
- Unauthorised reading/amendment/copying/distribution of exam papers;
- Failure to report changes in APP ownership/personnel/location/facilities;
- Denying WSET access to information, documentation, workforce, facilities;
- Failure to return exam papers within the specified timeframe or to follow delivery and tracking regulations;
- Infringements of WSET copyright, trademarks, intellectual property rights and brand identity;
- Use of unqualified and/or unregistered educators or internal assessors;
- Breach of confidentiality
- Misleading advertising/publicity;
- Any action likely to lead to an adverse effect.

For students:

- Cheating, or facilitating cheating, including the use of unauthorized devices or materials;
- Disruptive behavior in an exam;
- Plagiarism of any nature by students;
- Impersonation (including forgery of signatures);
- Unauthorized reading/amendment/copying/distribution of exam papers;
- Any action likely to lead to an adverse effect;
- Breach of confidentiality.

In general, we also expect that both Grape Secrets staff and our students should treat others and be treated professionally and respectfully at all times. We will treat inappropriate behavior including verbal or physical abuse, persistent or unrealistic demands, or threats that cause stress to staff as misconduct and may report student misconduct to WSET as necessary.

### **Reporting and Investigation of Malpractice or Maladministration**

As an APP, we aim to ensure compliance with WSET Policies and Grape Secrets policies and will keep records of potential or actual malpractice or maladministration by you, our students, or our staff.

We are required to notify WSET immediately of any non-compliance issues that could be malpractice or maladministration, so that WSET can investigate the non-compliance under their own Malpractice and Maladministration Policy.

We ask that you also raise any concerns or non-compliance issues that may be malpractice or maladministration with Grape Secrets as soon as possible by following the process outlined in our Complaints policy.

During WSET's investigation, they may reach out to Grape Secrets or to you directly to request further information or conduct an interview. Please respond to any requests promptly and honestly.

### **Managing Non-Compliance**

If WSET identifies malpractice or maladministration, they will consider its impact and may apply sanctions. WSET will take all reasonable steps to ensure the sanctions do not disadvantage uninvolved students affected by malpractice or maladministration. However, in some cases, they may need to disallow or withhold results and/or certificates.

WSET will consider all relevant information on a case-by-case basis, balancing the facts with potential or actual effects, and against the seriousness of the sanctions against those effects. WSET records all malpractice and maladministration incidents for both APPs and students. If WSET determines that a student has committed malpractice or maladministration, they may apply one or any of the following sanctions:

### **Sanctions Applicable to Students/Candidates**

<b>Sanction</b>	<b>Description</b>
Written Warning	The student is issued with a written warning that if the offence is repeated within a set period of time, then further specified sanctions will be applied.
Exam Result Declared Null and Void	A student's exam result is disallowed. This may include invalidation and recall of a certificate already issued.
Disqualification from a Qualification	The student is disqualified from participating in the concerned qualification with immediate effect and further excluded from participating in any further WSET qualifications for a period of 12 months. This includes access to WSET materials.
Student Disqualification	The learner is disqualified from participating in any courses or assessments leading to WSET qualifications. This includes access to WSET materials.
Disqualification from use of WSET certified logos and postnominals	Actions bringing WSET into disrepute may result in the student or graduate being barred from use of WSET postnominals and WSET certified logos

**Appeals** If you wish to appeal penalties or sanctions WSET has imposed due to Malpractice or Maladministration, please follow the procedures laid out in WSET's Complaints Policy

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- Send us a formal written email detailing your complaint to [info@grapesecrets.com](mailto:info@grapesecrets.com)
- Speak to a member of the team (+971 55 233 1149)
- Request an appointment by email to meet one of the team in person

Please note that for Grape Secrets to investigate your concerns, complainants must provide:

- Full name, address and contact details
- Details of the complaint (with supporting documentation if applicable)
- Details of any previous attempts to resolve the issue

On receipt of your complaint and supporting details, you will receive a notification of acknowledgement from the Grape Secrets team within three (3) working days. We endeavor to investigate your complaint in a thorough and professional manner and a full detailed response will be sent to you within three (3) weeks from initial acknowledgement.

Should the response not satisfy you, then we would ask you to email an appeal to Nuria Frau-Trullen at [nuriafrautrullen@googlemail.com](mailto:nuriafrautrullen@googlemail.com). A full review will be conducted with a response issued within two (2) weeks from receipt of the appeal.

If the complaint is still not resolved after receipt of response to the appeal, a complaint may be filed with WSET by emailing WSET's Quality Assurance Team at [QA@wsetglobal.com](mailto:QA@wsetglobal.com).

All complaints will be treated with the strictest confidence and will not prejudice the faculty or examination result of the complainant.

### **Complaints against the awarding body**

Complaints against WSET should first be discussed with Grape Secrets as detailed above. Documented evidence will then be forwarded to WSET who will address the complaint as per their own Complaints Policy. WSET's complaints policy is available on request from [QA@wsetglobal.com](mailto:QA@wsetglobal.com).



## **Privacy and Data Protection**

Grape Secrets cares about your privacy. When you enroll in a WSET course with Grape Secrets, we require some general personal information for example: name(s), date of birth, gender, email address and documentation provided to operate, provide, improve, understand, customize, support and market our services.

Grape Secrets will keep the candidates' details for the minimum period of 3 years. After 3 years the candidate may request for their data to be removed. Our Privacy Policy describes the types of information we receive and collect from you and how we use and share this information.

- To register you for WSET courses, appear for examinations, earn WSET qualifications and request reasonable adjustments if applicable.
- To issue you WSET exam results and qualification certificate.
- To support post-results services such as result enquiries and appeals as well as gather feedback on your WSET learning experience and qualifications.
- To provide assistance in any potential maladministration, malpractice or other non-compliance in the delivery of your WSET qualifications.
- To process invoices for sales services you have purchased from us.
- To keep you informed via marketing communication including upcoming WSET qualifications and events that you express interest in.
- We will not send you any marketing communication unless you have opted to receive Grape Secrets emails, SMSs, WhatsApp and/or social media updates.
- If you have made a purchase from us or enquired about our courses, we may contact you regarding similar qualifications or services. You will always be provided with the opportunity to unsubscribe from any further communication.
- At Grape Secrets we respect and take data protection seriously. We strive to ensure that the information we collect from you remains private. The candidates' data will be shared with WSET upon course enrolment. WSET will process candidate data and information in line with General Data Protection Regulations and WSET's Data Protection Policy. Please refer to [www.wsetglobal.com](http://www.wsetglobal.com) for more details on General Data Protection Regulations.

## **Cancellations and Refunds**

In the event of course or examination re-sit cancellations, please notify Grape Secrets a minimum of fifteen (15) days before the course / re-sit start date by email ([info@grapesecrets.com](mailto:info@grapesecrets.com)). The candidate will be entitled to a refund of 80% of the course / re-sit fees via bank transfer within 14 days under the following circumstances:

- Due written notice has been received and acknowledged by Grape Secrets
- Study materials are returned in useable condition

Should notice of cancellation be received less than fifteen (15) days before the course / re-sit start date, the candidate will forfeit their entire course fee.

Non-attendance of the course / re-sit will also result in forfeiture of the candidate's course / re-sit fees.

## How the apply for a course transfer

- Candidates may transfer to another course or alternative re-sit date up to fourteen (14) days prior to the start date at no extra cost. To do so, please inform Grape Secrets of your intent and transfer course / re-sit dates by emailing us at [info@grapesecrets.com](mailto:info@grapesecrets.com)
- Please note that course / re-sit transfers are subject to availability and confirmation by the Grape Secrets team. Any variance in fees must be borne by the candidate and is to be paid in advance.
- The assessment of candidates by an individual who has a personal interest in the result of the assessment for any or all individuals concerned;
- The 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 undertaking of a WSET qualification by any individual employed by an APP;
- The invigilation of a WSET assessment by any individual involved in the delivery of training leading to the assessment;
- The coaching of candidates by any individual involved in the assessment of candidate scripts;
- The employment by an APP of individuals engaged in the delivery of taught programs or in the role of Internal

Assessor in another APP;

- The investigation of a non-compliance incident by someone who is unable to act impartially.

Some of these Conflicts of Interest are manageable and therefore acceptable. For example, if family member of one of Grape Secret's educators or APP staff takes a qualification and exam through Grape Secrets, or when an employee of

Grape Secrets, or of the WSET, takes a WSET qualification through Grape Secrets we can notify WSET in advance and work with them to put in place measures to maintain the integrity of the exam.

Some Conflicts of Interest are not manageable and are not acceptable. For example, no mitigation efforts overcome the conflict created when an individual when a single individual serves as the educator and exam officer of an exam for a family member where an external invigilator is not available.

Any staff member or student of Grape Secrets who becomes aware of a Conflict of Interest must inform Nuria Frau Trullen +971552331149 or [info@grapesecrets.com](mailto:info@grapesecrets.com) as soon as possible.

Grape Secrets will inform the WSET of the possible conflict of interest and will work with WSET to put any protective or mitigating measures in place to manage the conflict on a case-by-case basis. If WSET and Grape Secrets determine the conflict is not manageable, Grape Secrets will inform any impacted APP staff or students.

Please note that the failure to declare a conflict of interest may have consequences for the student or Grape Secrets because we are required to report conflicts to WSET.

