



# **NEWQUAY FOR EXCELLENCE TRAINING LIMITED**

## **KEY POLICY STATEMENTS AND PLANS IN RELATION TO WORKFORCE DEVELOPMENT**

- **Equality and Diversity**
- **Harassment**
- **Health & Safety**
- **Quality Management**
- **Internal Quality Assurance (IQA)**
- **Sustainable Development & The Environment**
- **Teaching and Learning**
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- **Fraud, Theft and Anti corruption**
- **Safeguarding Learners**
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- **Breaks in learning for Apprentices**
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- **Learner Feedback**
- **ICT**
- **Data Protection**
- **Complaints**
- **Unacceptable Professional Conduct (Malpractice)**
- **Recognition and Accreditation of Prior Learning**

**Please sign to confirm you have been made aware of all NFET key policies and to confirm your understanding of such policies.**

**Learner signature: \_\_\_\_\_ Date: \_\_\_\_\_**

**79 MOUNT WISE NEWQUAY CORNWALL TR7 2BP t. 01637 871067**

## **Equality and Diversity**

The purpose of this Policy Statement and Plan is to provide Learners, Employers, Funding Bodies, Partners and Awarding Bodies with evidence that Newquay for Excellence Training is promoting equality of opportunity for all prospective workforce development candidates.

This policy statement relates to the progression of learners on a range of accredited and bespoke training provision, whether wholly or partly funded through Skills Funding Agency, European Social Funds or a combination of. It does not replace any documents or policies that businesses are legally required to provide in respect of their own business operations.

### **Policy Statement**

Newquay for Excellence Training is committed to the promotion of equality of opportunity by offering training opportunities that are;

- Free from unreasonable barriers which restrict access, achievement and progression and pay due regard to the special needs and/or disabilities of individuals
- Free from overt or covert discriminatory practices with regard to;
  - Race
  - Sex
  - Sexual orientation- preference towards own sex, opposite sex or both sexes
  - Disability (or because of something connected with their disability)
  - Religion or belief – related to any religious belief or non belief
  - Gender Reassignment – the process of changing sex
  - Pregnancy & Maternity –before the birth or within 26 weeks of the birth
  - Marriage and Civil Partnership
  - Age

In accordance with the nine protected characteristics stated within The Equality Act, 2010.

Through this equality and diversity plan Newquay for Excellence Training ensures that:

- The policy is applied within the organisation by all those who are directly or indirectly involved in the recruitment for and delivery of, workforce development, and client progression opportunities
- Recruitment policies and procedures adopt non-discriminatory practices and promote that publicity and advertising for all vacancies will encourage equally and fairly applicants from all groups.

- Both individual candidates and their employers have access to this policy and understand the position of NFET with regard to equality and diversity of opportunity
- Substantive Information, Advice and Guidance (IAG) is available to all clients, in order to promote the value of learning and support them as they progress through work and life long learning.
- Supplier Management procedures will ensure that providers of sub-contract provision have evidence that similar policies and procedures are applied.
- The monitoring and reporting procedures for this Policy and Plan are linked to our Self Assessment Reporting process and reviewed through the organisations own Quality Improvement Plan (QIP)

The Equality Act has brought together several different pieces of legislation. Information on changes from 1 October 2010 within the new Equality Act, 2010 can be found at;

[www.acas.org.uk](http://www.acas.org.uk)

[www.equalities.gov.uk](http://www.equalities.gov.uk)

[www.ageuk.org.uk](http://www.ageuk.org.uk)

[www.direct.gov.uk](http://www.direct.gov.uk)

[www.equalityhumanrights.com](http://www.equalityhumanrights.com)

[www.adviceguide.org.uk](http://www.adviceguide.org.uk) (citizens advice bureau)

### **Learner Adjustments, Considerations**

In line with this policy, NfET will ensure through its Learner Information Advice and Guidance procedures IAG, that any Special Consideration or Reasonable Adjustments requested on behalf of the learner is recorded in IAG documentation (Learner Agreement) and noted for appropriate training/ assessment purposes.

Special Considerations or Reasonable Adjustment provided under this Equality and Diversity Policy, will be in line with the appropriate awarding body Qualification Handbook, Centre Handbook or Core Guidance.

## **Harassment**

The purpose of this Policy Statement and Plan is to provide Learners, Employers, Funding Bodies, Partners and Awarding Bodies with evidence that Newquay for Excellence Training is has implemented policy and procedures relating to harassment and grievances.

This policy statement relates to the progression of learners on a range of accredited and bespoke training provision, whether wholly or partly funded through Skills Funding Agency, European Social Funds or a combination of. It does not replace any documents or policies that businesses are legally required to provide in respect of their own business operations.

### **Policy Statement**

Newquay for Excellence Training is committed to ensuring that all clients have the ability and opportunity to bring forward any issues of harassment or grievance, and that these issues are discussed and progressed through a process of professionalism and confidentiality, by ensuring that:

- The organisation has well defined procedures and that these are communicated to all staff and associates through a series of regular communication meetings.
- Key stakeholders are appropriately trained, have access to appropriate management support in order to deal with issues of this nature.
- The implementation of the policy and procedures is reviewed through the organisations Self Assessment Report (SAR) and the Quality Improvement Plan (QIP)
- Changes are agreed and implemented through the ongoing SAR and QIP cycle.

See Equality Act, 2010 for further information on dealing with harassment issues (direct or indirect)

## **Health & Safety**

The purpose of this Policy Statement is to provide Learners, Employers, Funding Bodies, Partners and Awarding Bodies with evidence that Newquay for Excellence Training is promoting health and safety for prospective workforce development candidates.

This policy statement relates to the progression of learners on a range of accredited and bespoke training provision, whether wholly or partly funded through Skills Funding Agency, European Social Funds or a combination of. This Policy Statement does not replace any health and safety documents or policies that businesses are legally required to provide in respect of their own business operations.

Newquay for Excellence Training recognises that the promotion of safe and hygienic working practices within its business is an essential part of its responsibilities. Furthermore, it regards the maintenance of health and safety matters as a mutual objective of all partners, employees, associates and trainees.

### **Policy Statement**

Newquay for Excellence Training will:

Ensure safe and healthy training conditions as far as is reasonably practicable, in accordance with relevant statutory requirements and industry best practice (in accordance with the Health and Safety at Work Act, 1974).

Encourage employers offering work-based learning and assessment sites to maintain continuing attention to all aspects of health, safety and hygiene, in particular by:

- Carrying out regular departmental health, safety and hygiene inspections
- Asking candidates to comment on health, safety and hygiene matters
- providing candidates with protective clothing and safe, appropriate equipment
- ensuring candidates take all reasonable steps for the health and safety of themselves and others affected by their actions and in so doing observe safe working practices and statutory obligations
- ensuring accidents are prevented by providing all relevant signs and props for use by candidates if required
- maintaining information on dangerous occurrences and maintaining full accident records
- co-operating in the investigation of accidents with the object of introducing measures to prevent re-occurrence
- ensuring all candidates have access to first aid
- displaying all relevant statutory health and safety notices
- signposting to further information and leaflets that can be obtained from [www.hse.gov.uk](http://www.hse.gov.uk)

## **Quality Management**

The purpose of this Policy Statement is to provide Learners, Employers, Funding Bodies, Partners and Awarding Bodies with evidence that Newquay for Excellence Training aims to provide a high quality learning experience for all their workforce development candidates.

Newquay for Excellence Training recognises that quality improvement activities are central to ensuring a learner centred approach to the delivery of workforce development opportunities.

### **Policy Statement**

Newquay for Excellence Training aims to provide all learners with high quality vocational training opportunities. This is achieved by ensuring that we have clear and concise quality improvement arrangements in place to:

- Ensure candidate participation in fit for purpose training and personal development activities, with access to additional support as identified.
- Assure the vocation and teaching competences of staff and associates involved in the learning and assessment process.
- Consider the views of staff, associates and learners in reviewing the quality of the training and assessment processes.
- Implement recommendations or good practice from Awarding Bodies or Sector Skills Councils in respect of sector/industry based quality assurance requirements.
- Use appropriate management information in order to ensure that quality judgements are based objective on evidence.
- Draw up and implement quality improvement plans that are based on continuous monitoring of the key processes involved in engaging and supporting learner achievement and progression.

## **NfET Internal Quality Assurance Strategy (IQA)**

NfET commits to providing an accurate representative spread of sampling and follow CAMERA principles in terms of IQA activities.

<b>Candidates:</b>	Taking into account candidate diversity
<b>Assessors:</b>	Differentiating between inexperience/experience
<b>Methods:</b>	Considering assessment methods and unit spread
<b>Evidence:</b>	Units sample and reasons
<b>Records:</b>	Monitoring assessment records
<b>Assessment Sites:</b>	Covering assessment sites

A minimum of 20% of assessment will be sampled. For newly approved qualifications and new assessors, for quality control purposes 100% sampling will be undertaken for the first course, both assessments, and at a level agreed between the IQA and EQA for following work, if this is deemed to be in excess of the 20%.

Sampling will include:

- Monitoring at interim and summative stages or post certification
- All centre marked assessment components
- All assessment methods
- A representative spread across registered candidates
- Decisions from all Assessors, and all assessment sites

Registrations will be used to pre-plan the IQA samples of each unit marked assessment component of the qualification and will indicate which candidate's work will be selected for IQA checks.

The plan will be available for the EQA as required. And sampling plans will be revised as and when changes take place with assessors or candidates. The plan may also be subject to changes based on candidate progress and changes to individual learner Individual Learning Plans, (ILP's).

### **Assessment Judgements - Standardisation**

Monitoring will occur at interim and summative stages. Interim sampling will highlight any early stage problems, so that corrective action may be taken and so that good practice can be identified and communicated.

Observations of teaching learning and assessment (OTLA) will also take place, with verbal and written feedback given. There also may be IQA observations from time to time conducted by Prime Funding Partners.

As additional support and for the development of all members of the assessment team, members will be provided with:

- Copies of ILM Qualification Specifications and its assessment requirements
- All information produced by the centre in connected with the assessment process, including guidance to candidates and report forms
- Information about appeals, equal opportunities, health & safety, quality and any other policies relevant

- Information about ILM and the appointed verifiers
- Information about candidates, including special learning and assessment needs.

All new Assessors at NfET undergo a thorough induction and mentoring process. This involves feedback being provided following all IQA activities. Ongoing development and improvement practices will be reviewed as part of the NfET quality assurance and standardisation activities undertaken at regular Team Meetings, held approximately every 4 – 5 weeks.

### **IQA Activities**

NfET commits to formal recording of IQA activities, to the quality and scope identified as follows:

- Clear, comprehensive and relevant to specific programme
- Maintained consistently with meaningful comments providing a clear audit trail
- Signed and dated
- Made available to centre Assessors as and when appropriate
- Made available to EQA and other ILM representatives on request, and to funding bodies/partners.

### **Continuing Professional Development**

NfET supports its Tutors, Trainers, Assessors and IQA personnel to continually improve and develop their skills, including the achievement of recognised assessment and IQA qualifications.

All copy qualifications (validated) are held within the training premises with CV's and CPD logs maintained to evidence appropriate levels of occupational competence and relevant experience.

We are committed to complying with the following requirements:

- Recruiting occupationally competent team members
- All decisions of unqualified assessors are countersigned by a qualified assessor mentor
- All decisions made by unqualified team members are countersigned by a qualified IQA.

*Adapted from ILM IQA Strategy revised May 2014*



## **Sustainable Development & The Environment**

The purpose of this Policy Statement is to provide Learners, Employers, Funding Bodies, Partners and Awarding Bodies with evidence that Newquay for Excellence Training is promoting the principles of sustainable development through all of its workforce development opportunities.

This policy statement relates to the progression of learners on a range of accredited and bespoke training provision, whether wholly or partly funded through Skills Funding Agency, European Social Funds or a combination of. This Policy Statement does not replace any policies, procedures or best practice that businesses may adopt in respect of their own business operations.

### **Policy Statement**

Newquay for Excellence Training is committed to the principle of sustainable development, enabling individuals to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life for future generations.

Newquay for Excellence Training will:

- Consider opportunities to support sustainability through procurement
- Demonstrate a 'duty of care' to ensure that any waste produced is handled safely and is passed onto a company with the necessary authorisation to deal with it (reference; Cornwall Council's, 'Managing Waste: A Guide for Businesses in Cornwall')
- Consider the use and adoption of learning materials that promote and support sustainability, particularly those relating to our specific sectors of operation
- Continue to enhance our community and employer communication and linkages in order to lead to greater involvement and understanding
- Seek opportunities to support individuals and businesses in order to contribute towards stable economic growth and employment

Further information on Environment & Sustainability can be found;

Cornwall Council                      [www.cornwall.gov.uk](http://www.cornwall.gov.uk)

Cornwall Waste Action              <http://wasteaction.org.uk>

CoaST (Cornwall Sustainable Tourism Project)              [www.cstn.org.uk](http://www.cstn.org.uk)

Environment Agency              [www.environment-agency.gov.uk](http://www.environment-agency.gov.uk)

## **Teaching and Learning**

The purpose of this Policy Statement is to provide Learners, Employers, Funding Bodies, Partners and Awarding Bodies with evidence that Newquay for Excellence Training is committed to inclusive learning that ensures the greatest degree of match between Employer and Individual Learner requirements, their learning goals, learning environment and opportunities provided.

Newquay for Excellence Training recognises that teaching and learning activities are central to ensuring a learner centred approach to the delivery of workforce development opportunities.

### **Policy Statement**

Newquay for Excellence Training aims to provide all learners with the highest quality personal development, and vocational training support. We are committed to widening participation and actively seek to encourage Employers and Learners to engage, participate, achieve and progress in appropriate workforce development opportunities, by:

- Providing clear guidance to all staff and associates on all appropriate organisational policies and progress implementation procedures, particularly but not exclusively in term of Safeguarding, Prevent and Equality and Diversity.
- Ensuring that all types and levels of training comply with Awarding Body guidelines relating to staff competencies and quality assurance procedures.
- Undertaking formal induction procedures for all new staff and associates, including named supervisor/mentor, probationary support and appraisal, all documented and held for QA purposes.
- Ensuring that staff and associates are supported in terms of issues raised by Lone Working, Risk assessment, Accident Prevention and Health & Safety.
- Ensure all Associate Tutors, Trainers and Assessors maintain Professional Body Membership, where applicable.
- Encouraging all staff and associates to participate in ongoing CPD activities and that are formally recorded for QA purposes.
- Taking steps to ensure that all subcontracting organisations implement similar plans with regard to training design and delivery.
- Monitoring and reviewing the whole process through the organisations own SAR and Quality Improvement Plan.

## **Supplier Diversity**

The purpose of this Policy Statement is to provide Learners, Employers, Funding Bodies, Partners and Awarding Bodies with evidence that Newquay for Excellence Training is committed to inclusive learning that ensures the greatest degree of match between Employer and Individual Learner requirements, their learning goals, learning environment and opportunities provided.

Newquay for Excellence Training recognises that 'supplier diversity' central to assisting a learner centred approach to the delivery of workforce development opportunities.

### **Policy Statement**

Newquay for Excellence Training aims to provide all learners with the highest quality personal development, and vocational training support. We are committed to widening participation and actively promote supplier diversity in order to encourage earners to engage, participate, achieve and progress in appropriate workforce development opportunities, by:

- Providing clear guidance to all staff and associates on the appropriate organisational policies and progress implementation procedures.
- Ensuring that we are active in seeking all types and levels of subcontract provision that complies with Awarding Body guidelines relating to staff competencies and quality assurance procedures.
- Encouraging all associates and subcontractors to participate in ongoing CPD activities and that are formally recorded for QA purposes.
- Taking steps to ensure that all subcontracting organisation implement similar plans with regard to training design and delivery.
- Monitoring and reviewing the whole process through the organisations own SAR and Quality Improvement Plan.

### **Disclosure or Whistleblowing**

As an employer, we aim to create an open, transparent and safe working environment where Staff and Associates feel able to voice their concerns or disclosures internally, or to a third party, in the knowledge that these concerns will be dealt with appropriately, consistently, fairly and professionally.

When making a disclosure, individuals must reasonably believe that they are:

- a) Acting in the public interest, and
- b) That the disclosure shows, past, present or future wrongdoing that falls into one or more of the following categories:

- Criminal offences
- Failure to comply with an obligation set out in law
- Miscarriage of justice
- Endangering someone's health & safety
- Damage to the environment
- Covering up wrongdoing in the above categories

The Directors of NfET recognise that:

- Staff and Associates are the eyes and ears of the organisation and as such their feedback could prevent a wrongdoing that could harm the organisation or individuals we support.
- An open and supportive culture is fundamental to ensuring that there is no fear of reprisal as a result of Staff or Associates making a disclosure decision.
- Communication, training and support is necessary to ensure that Staff and Associates feel able to approach Directors with their concerns.
- The Directors will act promptly to investigate, ask further questions and provide feedback, so that they can be better informed and able to manage risks appropriately.
- There are positive benefits to the organisation if Staff or Associates feel able to make disclosure internally, rather than referring the matter to a third party.

## **Anti Corruption, Theft and Fraud Policy**

NfET is committed to the prevention, deterrence, detections and investigation of all forms of corruption and fraud. NfET will seek to reduce the opportunity for fraud, and will take prompt action to fully investigate and address any suspected cases.

This policy requires all NfET staff and training associates to act honestly and with integrity and to safeguard and protect the use of public resources for which they are responsible.

It is the responsibility of all staff and associates to be familiar with the contents of this policy and related procedures, and to identify and notify NfET Directors of any suspected cases of fraud or risk of fraud.

### **Policy Statement**

NfET will not accept and level of fraud, theft or corruption within its operation, and will treat any such matter with the utmost seriousness. Any case will be thoroughly investigated and dealt with as appropriate.

Investigations make involve the Unacceptable Professional Conduct Policy and could result in dismissal and legal action. NfET may at the Directors discretion report serious and/or illegal acts of fraud to the appropriate authorities and the police.

### **Definitions**

For the purpose of this policy the following definitions will apply:

**Fraud** - 'The intentional distortion of financial statements or other records by persons internal or external to the organisation, which is carried out to conceal the misappropriation of an asset or otherwise gain.'

**Corruption** – 'The offering, giving, soliciting or acceptance of an inducement or reward that may influence the actions taken by a member of staff or an associate.'

**Bribery** – 'Where a financial or other incentive is received in an attempt to influence or retain an advantage'.

**Theft** – Dishonestly appropriating property belonging to another with the intent of permanently depriving the other of it.

For the purpose of this Policy, the use of the word 'fraud' will be deemed to include 'corruption', 'bribery' and 'theft.'

### **Minimising Risk**

**Management Responsibilities – Company Directors**

Company Directors are responsible for establishing and maintaining sound and appropriate systems of internal control that maintain and support NfET's

policies, aims and objectives. This system of internal control is an ongoing process intended to identify the principal risks, evaluate the nature and extent of those risks and mitigate against them effectively.

The Director will ensure that internal audit procedures are in place, including a risk profile for each contract, and regular reviews take place commensurate with the profile. The Directors will liaise as necessary with the Company Accountants/ Auditors.

#### Employee and Associate Responsibilities

It is the responsibility of employees and training associates to behave in a fair and honest way in any dealing relating to the discharge of their duties, internally and externally, on behalf of NfET. Due regard must be taken of the company's controls which are designed to prevent, deter and detect fraud and staff and associates must operate within the law, applying ethical business standards consistent with the management, control and application of EU and public-sector funding.

Any suspicions or concerns must be reported immediately to the Company Directors and failure to report such activity may result in disciplinary action. All staff and associates must co-operate fully with any internal checks, reviews or investigations.

All disclosures will be dealt with in confidence and in accordance with the terms of the Public Interest Disclosure Act 1998. **(For further details see NfET's Whistle-Blowing Policy.)**

#### Staff/Associate Induction, Training and Briefing

All NfET policies, including Anti Corruption and Fraud will be covered during Employee or Associate Induction Procedure.

It is the responsibility of team members to ensure that they are familiar with all NfET's Policies. Staff and associates will be advised at team meetings when Policies have been updated and a copy will be circulated by e-mail.

It is a contractual requirement for staff and associates to ensure that they read and are familiar with updated versions.

#### **Investigation of allegations - procedure**

Prompt and vigorous investigations will be carried out into all cases of suspected fraud or corruption.

The focus of any investigation will be to:

- Establish the facts and secure any evidence necessary for disciplinary or criminal action

- Review the reasons for the incident, the measures to be taken to prevent any recurrence and any action needed to strengthen future procedures
- Establish circumstances in which external agencies/specialists should be involved
- Keep appropriate authorities/organisations involved
- Minimise and recover any losses

### **Initiating Action**

All suspected incidents must be reported to the Company Directors as outlined in the Whistle Blowing Policy.

The suspicions must not be discussed with the individual/individuals concerned, nor must the case, facts suspicions or allegations be discussed with any other employee or associate.

If there are reasonable grounds for suspecting an incident has occurred the Company Directors, will within 24 hours take a decision about the potential severity of the allegation and seek guidance from independent Company Accountants/ Auditors as necessary.

In order to facilitate the investigation it may be necessary to suspend the employee or associate against whom the allegations have been made. This decision will be entirely at the discretion of the Company Directors.

### **Sanction**

The strongest available sanctions will be pursued against all who fraud or are involved in corrupt activities. These sanctions may include disciplinary action, prosecution, civil proceedings or a combination dependent upon the circumstances.

### **Redress**

In all proven cases, NfET will seek to recover any monies and will use all legal means available in order to do so.

## **Safeguarding Learners**

The purpose of this Policy Statement and Flow Chart is to provide Learners, Employers, Funding Bodies, Partners and Awarding Bodies with evidence that Newquay for Excellence Training is aware of and actively working in line with the following guidance for the protection of Children, Young People and Vulnerable Adults:

Working Together to Safeguard Children - (HM Government) 2015

Keeping Children Safe in Education- (Dept for Education) 2015

The Prevent Duty Guidance for England and Wales – HM Government 2015

Safe Network Standards - Safe Network 2014

Inspecting Safeguarding in early years, education and skills settings – Ofsted 2015

This policy statement relates to the progression of young people and adult learners on a range of accredited and bespoke training provision, whether wholly or partly funded through Skills Funding Agency, European Social Fund or a combination of. It does not replace any documents or policies that businesses are legally required to provide in respect of their own business operations.

### **Prevent**

Prevent is part of the UK Governments overall counter terrorist strategy. The aim of Prevent is to stop people supporting terrorism or becoming involved in terrorist activities, by:

- Responding to the ideological challenge of terrorism and the threat we face globally and nationally from those who promote it
- Protecting vulnerable young people and adults from being drawn into terrorism and ensuring that they are given appropriate support
- Working with sectors and institutions where there are risks of radicalisation which need to be addressed.

NfET is aware of its institutional responsibilities under the Prevent programme and these have been mainstreamed with our preventative and protection safeguarding processes.

### **Policy Statement**

Newquay for Excellence Training is committed to safeguarding young people and vulnerable adults participating in its learning opportunities by:

- Working with partners and other agencies to ensure that our learner's human and civil right are not violated. (see Equality & Diversity Policy)



- Ensuring that we implement rigorous recruitment and selection procedures for Staff and Training Associates. (see Safer Recruitment Policy)
- Ensuring that Staff and Associates receive appropriate training, ongoing support and access to CPD opportunities with reference to Safeguarding, Prevent and Health & Safety issues. (see Health & Safety Policy, Teaching and Learning Policy, Quality Management Policy and Self Assessment - SAR Quality Improvement Plan)
- Ensuring that information on NfET's Safeguarding responsibilities is discussed with learners as part of their Training Induction and that our policies and policy references are freely available within Learner Portfolios and on the NfET web site (see [www.nfet.co.uk](http://www.nfet.co.uk))
- Ensuring that learners feel able to bring forward concerns, grievances, complaints, issues of harassment or bullying in a professional and confidential environment. (see Quality Management Policy - Harassment Policy & Learner Feedback Policy)
- Ensuring that learners are made aware of NfET's policy with reference to the professional and safe use of ICT, including text, e-mail, internet, social media and any other devices. (see ICT Policy)
- Ensuring that personal and sensitive information is securely and confidentially stored, and that immediate and appropriate action is taken should an incidence of abuse, neglect or ideological challenge of a vulnerable young person or adult be identified or suspected. (see Data Protection Policy)
- Ensuring that Staff and Associates work within an open, transparent and safe working environment, where they feel able to voice their concerns or grievances internally, or to a third party, in the knowledge that all disclosures raised will be dealt with appropriately, consistently, fairly and professionally. (see Supplier Diversity Policy –Whistleblowing)

Within this context we are committed to protecting children and young people from harm perpetrated either face to face or via the use of digital technology.

Abuse may take the form of:

- Neglect
- Physical abuse
- Sexual abuse
- Emotional abuse
- Bullying, including on-line and prejudice based
- Racist, disability and homophobic or transphobic abuse
- Gender-based violence/violence against women and girls, inc FGM
- Radicalisation and/or extremist behaviour
- Child sexual exploitation and trafficking
- Gang, youth and domestic violence
- Substance and alcohol misuse

- Impact of new technologies on sexual behaviour
- Issues not listed but pose a risk to children, young people and vulnerable adults

## **Responsibility and Designated Officer/s**

In order to comply with our Safeguarding and Prevent undertakings the joint Company Directors, Gill Moore and Ruth Vincent, as the most senior representatives of the organisation, wholly support this Policy and Gill Moore, will fulfil the role of Designated Safeguarding Officer and Ruth Vincent (Deputy) with responsibility for:

- Establishing clear lines of accountability and responsibility at Company Director level
- Liaising with the local authority, police and working with other organisations as necessary
- Overseeing safe staff recruitment and selection practices
- Providing advice and support to staff and associates
- Co-ordinating staff training and training for associates
- Fostering an open and honest culture and reporting procedures as per the principles of the Francis Review – Freedom to Speak Up
- Reviewing course and learner feedback as part of Quality Assurance and Self Assessment
- Reviewing associated Safeguarding and Prevent policies and practices accordingly

Section 11 of the Children's Act 2004 place duties on organisations and individuals to ensure that their functions are discharged with regards to the need to safeguard and promote the welfare of children and young people. More specifically Section 91 (3) of the Further and Higher Education Act 1992, details the expectations on further education and skills providers that are not colleges of FE, as:

- Voluntary organisations and private sector providers play an important role in delivering services to children. They should have arrangements in place, in the same way as organisations in the public sector, and need to work effectively with the Local Safeguarding Children Board.
- These organisations should have in place arrangements that reflect the importance of safeguarding and promoting the welfare of children.

We recognise that further education staff have a crucial role to play in helping to identify welfare concerns and indicators of possible abuse or neglect, at an early stage: referring those concerns to appropriate organisations.

**NfET Contact Details:**

Name	Position	Phone	E-mail
Gill Moore	Designated Safeguarding Officer	01637 871067	gill@nfet.co.uk
	Prevent – Single Point of Contact (SPOC)		

**Deputy Contact (should the above officer of the company be unavailable)**

Name	Position	Phone	E-mail
Ruth Vincent	Designated Safeguarding Officer (Deputy)	01637 871067	ruth@nfet.co.uk
	Prevent – Single Point of Contact (SPOC) Deputy		

**Information Sharing and Reporting:**

**Safeguarding:**

Cornwall Council and the Council of the Isles of Scilly, in exercising their social care functions, are responsible for ensuring there is a Local Safeguarding Children Board (LSCB) covering their area, to bring together representatives of each of the main agencies and professionals responsible for helping to protect children and vulnerable young people from abuse and neglect.

The LSCB in an inter-agency forum and any incidence of abuse or neglect will be reported to the:

Multi Agency Referral Unit (MARU) on: 0300 123 1116  
 Out of Hours Contact: 01208 251300

**Professional Working with Children:**

Concerns Regarding Professionals working with Children or Young People can be reported to:

The Local Authority Designated Officer (LADO) on: 01872 326536

**Prevent:**

Any concerns raised with regard to Prevent, will be reported to our local Prevent Lead, Steve Rowell at [prevent@cornwall.gov.uk](mailto:prevent@cornwall.gov.uk)

**References:**

Working Together to Safeguard Children

[www.gov.uk/government/publications/working-together-to-safeguard-children](http://www.gov.uk/government/publications/working-together-to-safeguard-children)

Keeping Children Safe in Education

[www.gov.uk/government/publications/keeping-children-safe-in-education](http://www.gov.uk/government/publications/keeping-children-safe-in-education)

Prevent Duty Guidance England and Wales

[www.preventforfeandtraining.org.uk](http://www.preventforfeandtraining.org.uk)

The Safe Network

[www.safenetwork.org.uk](http://www.safenetwork.org.uk)

Child Protection and Safeguarding

Whistleblowing/Disclosure

[www.acas.org.uk/grievances](http://www.acas.org.uk/grievances)

Signed .....

G A Moore (Director)

Signed .....

R T Vincent (Director)

This Policy will be subject to Revision in October 2016 or before if required.

**APPENDIX NfET Flowchart for Staff & Associates - Reporting Safeguarding Concerns**

## **Safe Working Practices / Lone Worker**

The purpose of this Policy Statement is to provide Staff, Associates, Funding Bodies, Partners and Awarding Bodies with evidence that Newquay for Excellence Training is aware of its responsibilities for those affected by its work activities.

Equally employees and associates have a responsibility to take care of themselves and other people affected by their work activities and to co-operate with their employers in meeting their legal obligations.

All staff – including Self Employed Associates have a responsibility to:

- Take reasonable care to look after their own health and safety
- Safeguard the health and safety of other people affected by their work
- Co-operate with their employers health and safety procedures
- Use tools and other equipment properly, in accordance with relevant safety instructions and any training that has been given
- Not misuse equipment provided for their health and safety
- Report instances of bullying and inappropriate behaviour
- Use internet access appropriately and not for social networking purposes, unless specifically work related

## **Policy Statement**

NFET will investigate potential hazards faced by staff (including lone workers) and assess the risks involved to any person who may be affected by their work and will:

- Involve staff and associates when undertaking the risk assessment process, On and Off Site, including emergency contact procedures
- Take steps to ensure that control measures are in place (including any requirement for instruction or training)
- Review risk assessments annually, or when any significant change is made to working practice
- Provide references for further information and best practice guidelines on working alone, working from home and travelling while working alone

This policy will be reviewed annually and will be review and discussed by staff and associates as part of the induction process for new trainers, tutors and assessors.

Further information:

Safe Working Practices HSE [www.hse.gov.uk](http://www.hse.gov.uk)

The Suzy Lamplugh Trust [www.suzylamplugh.org](http://www.suzylamplugh.org)

Working Alone - Health & Safety Guidance on the risks of lone working  
[www.hse.gov.uk/pubns/indg73.pdf](http://www.hse.gov.uk/pubns/indg73.pdf).

## **Safer Recruitment Policy**

The purpose of this Policy Statement is to provide Funding Bodies, Partners and Awarding Bodies with evidence that Newquay for Excellence Training has set out the minimum requirements of our recruitment process which aims to attract the best possible applicants for opportunities promoted.

Recruitment practices will be overseen the Company Directors, who will ensure that staff and associates involved in recruitment procedures have been fully briefed on this policy before selecting applicants for interview or interviewing.

### **Inviting expressions of Interest**

Any opportunities advertised will include the statement:

'Newquay for Excellence Training Limited (NfET) is committed to safeguarding children, young people and vulnerable adults. Appointments may be subject to a satisfactory Criminal Records Bureau disclosure.'

Prospective applicants will be supplied with the following:

- Job Description or Training Requirement Specification
- NfET Policy Statements, including Safeguarding and Safer Recruitment
- Selection Procedure
- Application form
- Monitoring form
- Draft Associate Agreement (where appropriate)

### **Short Listing and References**

Short listing of candidates will be against Job Description or Training Requirement specification. Minimum of two references will be required prior to interview. Enhanced CRB check will be undertaken (where appropriate) and the Independent Safeguarding Authority (ISA) lists (Vulnerable Children/Vulnerable Adults) will be reviewed following the ISA Home Office Guidance. Where appropriate candidate Institute for Learning (IFL) Membership and CPD records will be reviewed.

### **Selection**

Selection techniques will be determined by the nature of the position, but all selection will require:

- Face-to-face interview
- Safeguarding to be part of the interview process.
- Candidates to explain gaps in employment and any anomalies or discrepancies in the information available
- Candidates to declare any information that is likely to appear on a CRB disclosure

- Candidates to demonstrate their capacity to safeguard and protect the welfare of children, young people and vulnerable adults

NfET will always

- Confirm the outcome of the interview within 7 working days
- Give feedback on the interview if required by the applicant

### **Employment checks**

All successful applicants (staff and/or associates) will be required to:

- Provide proof of identity
- Complete the monitoring form
- Complete a CRB disclosure application and receive satisfactory clearance
- Provide actual certificates of competence and qualification for NfET to retain copies
- Provide proof of eligibility to live and work in the UK

### **Induction and Probation**

All staff and associates will receive a formal recorded induction (see Induction Check-List) that includes NfET policies and procedures, including guidance on Safeguarding, Prevent, Safe Working Practices (including accident prevention and health & safety briefings) and Lone Working.

All new staff and associates will be subject to a pre-agreed probation period, with a named line-manager responsible for initial probationary support, review and appraisal.

### **Communication and Meetings**

Staff are required to attend regular communication meetings at a frequency determined by the Co-Directors and Operational requirements.

All Associate Tutors, Trainers and Assessors are required to attend as many pre-scheduled monthly communication meetings as they are able, for which they will receive remuneration as detailed in their Service Agreement.

## **Breaks in Learning Policy for Apprentices**

The purpose of this Policy Statement is to provide Learners, Employers, Funding Bodies, Partners and Awarding Bodies with evidence that Newquay for Excellence Training (NFET) is committed to inclusive learning and ensuring that all learners are informed of the policy for breaks in learning, as part of funded training activity.

### **Purpose**

In line with Funding Agency requirements, this policy sets out how NFET will respond to and manage breaks in learning for apprentices.

### **Acceptable reasons for breaks in learning**

Circumstances which may cause a break in learning for an apprentice include, but are not limited to the following:

- Ill health
- Pregnancy
- A custodial sentence
- Remand in custody
- Caring for another

### **What the learner or employer should do**

As soon as it is known that a learner is temporarily unable to continue with their training, they (or their employer) should contact their NFET using the phone, e-mail or text details provided.

NFET will establish the reason and agree the duration of the break. Breaks are normally not less than 8 weeks and do not normally exceed one year.

### **NFET will take the following actions:**

- Agree and record the start and end date of the agreed break (although this can be reviewed)
- Evaluate the impact of any expected or known changes to qualifications that form part of the apprenticeship framework to ensure the learner's continued progress is not hampered should standards change
- Advise the Learning Partnership of the break in learning and update the learner's records accordingly
- Contact the learner at least one month prior to the agreed return date to confirm return to work and training
- Be aware of Awarding Body requirements in terms of learner qualification registration expiry dates



## **Training and Apprenticeship Attendance Policy**

The purpose of this Policy Statement is to provide Learners, Employer, Funding Bodies, Partners and Awarding Bodies with evidence that Newquay for Excellence Training (NFET) is committed to inclusive learning and ensuring that all learners are informed of the attendance requirements and consequences of un-authorised absences as part of funded training activity.

### **Policy Statement**

This policy is to be applied when learners are attending a training session for classroom based training activity and the theory training elements of the Apprenticeship framework.

- The trainer and/or instructor will notify all learners of this policy as part of the initial programme Induction.
- Unexcused absences (which could include coming in late) could result in the learner's removal from the training course.
- If the learner is unable to attend a training session, he or she must immediately notify the NFET by phone, e-mail or text using the details provided.
- It is the responsibility of the NFET to supply learners with a phone number as part of their induction where they can leave messages.
- Absences that accumulate will be discussed at the NFET scheduled monthly programme delivery meetings and if deemed appropriate the situation will be discussed with the learners and/or employer.
- When absences are of an unexcused nature, NFET will provide a letter to the learner, copied to the employer, indicating clearly on the letter that further unexcused absences may result in their termination from the training course/apprenticeship programme.
- All actions will be noted and correspondence will go into the learners file.
- When recommended action by NFET calls for termination of the learner from the programme, the learner and employer will be notified in writing.
- The Learning Partnership for Cornwall and the Isles of Scilly will be updated through learner records as appropriate.

Copies of all correspondence will be maintained in the Apprentice's learner file.

## **Learner Feedback**

The purpose of this Policy Statement is to provide Learners, Employers, Funding Bodies, Partners and Awarding Bodies with evidence that Newquay for Excellence Training (NFET) is committed to improving the quality of our teaching and learning environment through learner feedback and evaluation. NFET provides feedback to and from learners in a variety of ways, for example, formative summative assessment and programme evaluation. NFET seeks feedback from learners through formal and informal evaluation. NFET will also receive feedback through the complaints procedure and awarding body appeals procedure if implemented.

### **Policy Statement**

- Wherever possible NFET will seek to ensure that feedback is secured from a sample of learners, such a sample includes learners from a diversity of backgrounds and experiences
- NFET will seek to make links between the different methods of obtaining feedback in order to maximise the usefulness of information received from learners to the programme team
- NFET will also seek to improve coordination of feedback and evaluation to ensure that comments on services and facilities are fed through to relevant individuals.
- At the same time, NFET is concerned to maximise feedback to learners as well as from learners so that they are aware of the value of their feedback. By demonstrating that we are considering learners' views and reporting on action taken as a result of their feedback, we will emphasise to learners the importance of providing feedback.

### **The 'feedback loop'**

NFET seeks to ensure that the 'feedback loop' facilitates action arising from learner feedback. Information from the feedback provided by learners will be considered at pre scheduled monthly trainers meetings and case conferences. All meetings are documented. Appropriate action will be considered and recommendations will feed in to strategic planning processes at all levels.

Feedback should be both reflective and evaluative, drawing on various sources of evidence e.g. feedback through formal assessment and one to one comments.

Ongoing feedback collated, from varying sources, on a year round basis will be used in order to inform NFET's Self Assessment Report (SAR) and appropriate actions included the Quality Improvement Action Plan (QIAP).

An important feature of the feedback loop will be providing information to learners and staff on the action proposed and/or taken as a result of learner feedback. Information on student feedback will also be published on our website or included in promotional materials, from time to time.

## **ICT**

The purpose of this Policy Statement is to provide Learners, Employers, Funding Bodies, Partners and Awarding Bodies with assurance that Newquay for Excellence Training (NFET) its use of ICT is consistent with the ethos of best practice, other policies and the law.

As a professional organisation with safeguarding responsibilities NFET and its staff, tutors and associates will take all necessary measures to protect data and information systems from infection, unauthorised access, damage, loss, abuse and theft.

The following statements are not an exhaustive list, but serve to ensure that awareness of personal and professional responsibilities is maintained when using Information communication Technology.

### **Policy statement**

- Information Systems and ICT include networks, data and data storage, online and off line communication technologies and access devices, including mobile phones, digital cameras, email and social media
- System security will be respected and security information and passwords will not be disclosed
- Software, including browser toolbars will not be purchased or downloaded without permission of a Company Director and without consulting the externally company appointed Systems Specialist
- The personal data of employers and learners will be kept in accordance with the Data Protection Act 1998, maintained for a specific purposes and held no longer than necessary, as required by ESF/SFA sub contract agreements held
- Copyright and intellectual property rights will be respected
- Use of ICT and information systems will always be compatible with professional roles and responsibilities. This includes the use of text, email, social medial, social networking and any other devices
- E-safety will be promoted to all learners, encouraging them to develop a responsible attitude to online safety and ICT usage
- Any incidents of concern will be reported immediate to a Company Director

NFET may exercise its right to monitor the use of information systems in order to monitor compliance with this Policy.

## **Data Protection**

The purpose of this Policy Statement, is to provide Learners, Employers, Funding Bodies, Partners and Awarding Bodies with evidence that Newquay for Excellence Training, fully endorse and adhere to the Principles of Data Protection, as set out in the Data Protections Act 1998.

Newquay for Excellence Training Limited collects and uses information about people and organisations with whom it communicates. The Data Protection Act provides safeguards to ensure that personal information is dealt with properly and securely however it is collected, recorded and used – whether on paper, in a computer, or recorded on other materials.

As a data user, NFET complies with the eight data protection principles of good practice that underpin the Act, which are summarised below:

- Personal data will be processed fairly and lawfully
- Data will only be collected and used for specified purposes
- Data will be adequate, relevant and not excessive
- Data will be accurate and up to date
- Data will not be held any longer than necessary
- Data subject rights will be respected
- Data will be kept safe from unauthorised access, accidental loss or damage
- Data will not be transferred to a country outside the EEA

These principles apply to all 'personal data' which is information held on a computer or in a manual filing system from which an individual (data subject) is identifiable.

In order to meet its responsibilities NFET data is stored under two categories:

1. Internal data records - including staff and associate data
2. External data records – including businesses and learners

### **Purposes**

NFET obtains personal data on Learner Agreements, Company Level Data Capture (De Minimis) Forms and within associated SFA and ESF funding paperwork. Minimum necessary details are held on staff and associates. Data is stored and processed for the following purposes:

- Company client recruitment
- Learner recruitment
- Payroll
- Equality and Diversity Monitoring
- Training evaluation
- Employment outcome confirmation
- SFA/ESF reporting

### **Access**

Contact details for staff and associates will only be made available to other staff and associates. All staff and associates have been made aware of the policy and their obligations not to disclose personal data to anyone outside the organisation without explicit consent from the data owner.

### **Storage**

Business and learner data will be retained in secure filing, paper and electronic systems and only accessed by individuals involved in service delivery and funding bodies as identified.

### **Retention**

Business and learner data collated in respect of SFA and ESF training contract delivery will be retained only for the period required within the delivery Service Level Agreement.

Internal personal data will be stored as long as the data owner is part of our organisation and thereafter we will normally keep them on file for future reference.

### **Accuracy**

NFET will take responsibility to keep internal data records up to date and accurate.

External data records will reflect the data subject at the point of engagement.

Newquay for Excellence Training Limited –  
Data Protection Registration Number – Z4648219

[www.gov.uk/data-protection](http://www.gov.uk/data-protection)

*See addendum:*

- Learner consent form - Use of taped and video evidence used in achieving qualifications*
- Learner consent form - Use of photographs showing learner's image*
- Learner consent form - Notification to employers of course results*

## **Complaints**

The purpose of this Policy Statement is to provide Learners, Employers, Funding Bodies, Partners and Awarding Bodies with evidence that Newquay for Excellence Training will monitor, take seriously and deal promptly with any complaints received, and will ensure that prompt action is taken to satisfy the complaint wherever possible.

### **How to Complain**

Complaints can be made:

- Verbally, by telephone using the contact details on the cover document
- In writing to the e-mail address or postal address on the cover document
- In person at the address on the cover document

### **Personnel responsible for processing complaints**

If a complaint is made during a training session, workshop or on-the-job assessment, the tutor, trainer or assessor will deal with this initially. It will be reported to one of the Company Directors on return to the office, and centrally recorded.

Complaints made directly to the NfET office, either verbally or in writing will be investigated by one of the Company Directors.

If a complaint is made against a tutor, trainer or assessor, the situation will be addressed and any necessary action taken. All tutors, trainers and assessors are subject to internal rules and procedures and recognised Awarding Body Codes of Practice.

### **Procedure for dealing with complaints**

If an issue is raised with a tutor, trainer or assessor during a training session, they will take the comments on board and if appropriate take action to resolve the issue immediately.

All complaints will be recorded. Tutors, trainers and assessors are required to report complaints on their return to the office. All complaints will be investigated and responses made in a timely manner, as set out below.

All complaints will be reviewed at scheduled meetings and systems and procedures or practices changed accordingly, where necessary.

### **Timescale**

If possible, the issue will be resolved immediately. Otherwise a Company Director will acknowledge receipt of all complaints within 5 working days, and respond in full to all complaints within 10 working days. Responses will be communicated in the manner in which the complaint was received, wither verbally or in writing.

## **Unacceptable Professional Conduct - Malpractice**

The purpose of this Policy Statement is to provide Learners, Employers, Funding Bodies, Partners and Awarding Bodies with evidence that Newquay for Excellence promotes exacting standards in respect of professional conduct.

This policy applies to Staff, Associates and Learners engaged with Newquay for Excellence Training Limited. (NfET)

'Malpractice' is behaving in a manner which is unprofessional and unacceptable, which could well have adverse impacts on your own professional reputation and that of Newquay for Excellence Training Limited. Malpractice will breach the organisational policies of NfET and in some cases, may also break the law.

Examples of malpractice are noted below:

- Failing to declare a conflict of interest which may benefit yourself or yourself and an associate in an unfair way
- Misrepresenting yourself, or NfET, or colluding with others to do the same, for personal advantage or gain
- Failing to take care of yourself and/ or others as required under the Health & Safety At Work Act, 1974, and as a result putting yourself and / or others at unnecessary risk
- Failing to report any legal, safeguarding or other NfET organisational breach to NfET in order to discharge their legal and/ or civil responsibility
- Failing to comply with security requirements in terms of protecting security of information
- Breaching any Code of Conduct applicable to staff, associates or learners engaged with NfET which may bring yourself and / or NfET into disrepute
- Inappropriately sharing confidential information which is not intended to be shared
- Failing to preserve the security of information relating to work at NfET and as such, breaching the requirements of the Data Protection Act
- Failing to observe and operate to the principles contained with the Equality Act, 2010 and have appropriate regard for the 'protected characteristics', as follows:

- Age
  - Disability, i.e. physical and /or mental impairment with a long term, significant and adverse effect
  - Marriage/Civil Partnership ie permitted legal union of same sex couples
  - Sex, i.e. gender – male or female
  - Sexual orientation – preference towards own sex, opposite or both sexes
  - Gender reassignment, i.e. the process of changing sex
  - Pregnancy, i.e. discrimination before the birth of a child towards a pregnant woman, and maternity, i.e. discrimination towards a new mother within 26 week of the birth
  - Race, i.e. discrimination on the basis of ethnic origin, nationality, race or colour
  - Religion and Belief, i.e. discrimination related to any religious belief or non belief (atheism)
- Plagiarism, i.e. submitting work as entirely your own which is not entirely your own work. Plagiarism can arise from any of the following circumstances:  
(Note: this is not an exhaustive list and there may be other circumstances noted here where plagiarism occurs.)
    - Directly copying the work of others or changing a limited number of words/diagrams or other information to misrepresent the work as your own
    - Using information in various formats from another source which is not clearly stated as such – note that if other sources of information are used, they should be appropriately referenced
    - Purchasing materials, or procuring work in other ways to represent as your own without declaring the appropriate source (this could include buying pre-prepared work or implying the work is yours when it has not been originated by yourself)

Instances of suspected malpractice will be investigated by NfET and sanctions may be applied as a result of this investigation concluding that there is a case to answer.

The investigation will commence within five working days of NfET being informed of potential malpractice, though you should note that this may not always be concluded within five working days. NfET recognises that this is a stressful situation and will endeavour to conclude any investigation at the earliest opportunity.



There is the right of appeal to a Director of NfET within five working days of having received a conclusion from the investigation, should you consider the outcome to be unfair. Your reason for appeal should be summarised in a written communication, which must be signed by yourself and received by NfET within five working days of your having received notice of outcome of the investigation.

Malpractice may be regarded as gross misconduct, and in such cases, sanctions could include termination of employment for Staff, termination or working relationship for Associates, or withdrawal from courses for Learners (Learner's employers will always be made aware of any investigation on commencement).

## **Important Note for Learners – Confirmation of Authenticity**

Learners will be required to complete a Statement of Authenticity to confirm that any work submitted is entirely their own. The wording and format of this Statement will be in accordance with the Awarding Body requirements if relevant, or in accordance with NfET requirement if there is no recognized Awarding Body (i.e. for non-accredited courses).

NfET requires, where an Awarding Body Statement is not used that the Learner declares the following at the end of each piece of work :

Statement – ‘ I, ( insert name), confirm that this work is entirely my own except where referenced against a defined source, and I have read the NfET Malpractice Policy and understand the potential consequences of this. ‘

Signed: ( insert signature)

Name : ( insert printed name)

Dated ( insert date)

## **Recognition and Accreditation of Prior Learning (RPL and APL)**

Recognition of Prior Learning (RPL) or Accreditation of Prior Learning (APL) is an assessment process that allows a learner to demonstrate that they already have the knowledge, understanding and skills required for a unit in the qualification they are about to undertake.

This could be formal or informal and so the learner may not have a qualification in this area. Nevertheless as long as they meet all the assessment requirements, RPL / APL allows the learner to receive credit for their learning.

Evidence for this can draw on any aspect of the learners prior experiences, including:

- Domestic / family life
- Education and training
- Work activities
- Community or voluntary activities

NfET follows the good practice guidance issued by regulators and by Ofqual which states that evidence obtained through PRL processes must be assessed to the same rigorous quality as evidence obtained through any other process.

In considering this assessors and IQA staff at the centre will ensure that the learning outcomes are only deemed to have been met when the evidence provided is:

**Valid:** Genuinely demonstrates that the demands of the learning outcome have been met.

**Authentic:** Evidence examined is genuinely considered to be the work of the learner.

**Sufficient:** Fully meets all the requirements of the learning outcome being considered.

**Reliable:** Where the assessment is to be repeated the outcome would remain consistent.

If an individual can demonstrate that they meet ALL the assessment outcomes and assessment criteria in a unit, they may claim solely on the basis of RPL achievement.

If however evidence from RPL is only sufficient to cover part of the learning outcomes additional assessment methods must be employed to generate sufficient evidence on which to base a safe assessment decision.

*Adapted from City & Guilds Assessment Policy and Guidance Document v 2  
2013*