



**appa me Ltd**

**Training Policy Pack**

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## 1 Policy Review and Monitoring

All policies are overseen by the appointed training manager and registered company director

Policies are reviewed every 12 months, or sooner dependant on changes within the industry and requirements from awarding bodies, changes in legislation, case law or civil rights updates.

Decision regarding policies are to be made:

- after consulting results of monthly random sampling
- and, subsequent to major changes to current policy following changes within the industry and requirements from awarding bodies, changes in legislation, case law or civil rights updates

Changes made to policies are to be updated and communicated to candidates and all training faculty, via email, memo and notice boards.

Criteria for policy review mechanism are:

- Ensure that the policy is up to date
- Ensure that the policy is used effectively
- Ensure that the policy follows actual practise
- Check the policy against actual practise

Policies are compiled due to relevance, need and requirement – as instructed by appa Training affiliated memberships, applicable awarding bodies and UK governmental policies.

## 2 Malpractice and Maladministration

This policy provides definition and examples of Malpractice and Maladministration, and is in place as a requirement of membership to a number of awarding bodies.

The process for preventing, investigating and dealing with Malpractice and Maladministration is described. All suspected or alleged instances of malpractice or maladministration will be reported to the relevant awarding body, following internal investigation and collection of evidence.

### a. Definitions

#### b. Malpractice (by centres/providers)

- i. Malpractice is any activity which deliberately contravenes procedures and regulations calling into question and raising serious concerns regarding the integrity of the centre, impacting on the validity of certificates.

*Examples of malpractice:*

- *Deliberate misuse of the awarding bodies logo by the centre/ provider*
- *Contravention of examination regulations by the centre / provider*
- *Falsification of documents*

- ii. Malpractice (by learners) Malpractice is any activity or practice which deliberately contravenes procedures and regulations. It means that there are serious concerns as to the learners integrity and the validity of certificates.

*Examples of malpractice:*

- *Cheating of any nature by learners, including plagiarism*
- *Deliberate misuse of the awarding bodies' logo by the learner*
- *Contravention of examination regulation by the learner*
- *Repeated maladministration*

#### c. Maladministration

- i. Maladministration is an activity or practice which results in non-compliance with regulations whether genuine or deliberate.

*Examples of maladministration;*

- *Late registration of learners*
- *Claiming for certification for incorrect units*
- *Non-payment of fees despite 3 formal requests*
- *Non-compliance with assessment procedures and practice*

- *General non-compliance with awarding body requirement in line with signed agreements*

#### *d. Reporting*

The training centre and its teaching faculty strive to avoid any occurrence of maladministration and encourage its learners to do likewise.

It is understood and agreed by appa Training that any concerns of malpractice and maladministration will be communicated to the relevant awarding body so an impartial investigation can be carried out.

When carrying out an internal investigation appa Training will:

- Gather statements from involved teaching faculty and learners
- Gather evidence from available materials, i.e CCTV, emails
- Provide all details to the awarding body for their immediate review and enabling them to implement their own malpractice strategy
- Follow and implement advice / guidance provided by the awarding body
- Publish findings to all involved persons

Learners found culpable of malpractice or maladministration work will be declared invalid, and could be removed from their courses.

Teaching faculty found culpable of malpractice or maladministration will be held under review and could face being removed from delivering or being involved in the delivery of the associated programme until retraining has taken place.

### 3 Assessor Monitoring and Development / Quality Assurance

This policy sets out how the quality of all qualifications will be monitored. It is designed to promote quality consistency, accuracy and fairness in assessment practice. The strategy incorporates the standards set by OFQUAL and the Awarding Organisation that our qualifications apply to. It embraces the internal quality assurance and Leading the Internal quality assurance standards laid down by the different awarding organisations as well as our own internal procedures.

#### Key Responsibilities

- Evaluating assessors by observing performance and CPD attendance
- Assuring the quality of the systems and procedures used for assessment and verification
- Supporting and advising assessors
- Sampling evidence to verify assessment decisions
- Keeping records up to date including sampling plans, records for EQA visit, one to ones for assessors, maintenance of CPD and other records for centre use etc
- Assuring the standardisation of assessment practice
- Undertaken one to ones with individual assessors
- Keeping own practices current and maintaining personnel CPD
- Quality assurance of SFA records if required
- Monitoring learners to ensure they are aware of and satisfied with the assessment process
- Checking that the of all assessment documentation meets centre, Awarding Organisation and SFA requirements (if required), and is up to date
- To identify problems or areas where assessors require advice / development
- To release folders back to learners using the appropriate documentation

The internal quality assurer should act in a supportive and encouraging role and identify and highlight good practice as well as concerns. It is the Internal Quality Assurers responsibility to ensure that any necessary support mechanisms have been put in place.

It is generally acknowledged across the NVQ industry that there are three main areas of issues and concerns with regard to the quality assurance processes, which are:

- Lack of monitoring of actual assessments
- Poor recording of monitoring and
- Little or no use made of results of monitoring to improve the standards of assessment

appa Training therefore puts quality assurance at the heart of the assessment process and that there must be clear linkage between quality assurers and management. Time will be allotted to this on a one to one basis and agreed accordingly as follows:

### **Developmental Responsibilities**

It is expected as the various services delivered by appa Training develop there is a continued need for IQAs to develop quality assurance processes. This will enable the centre to function with qualification specific expertise and allow the company to develop with knowledge that the individual qualification areas are covered with appropriately qualified staff. In addition to the Key responsibilities set out above for Internal Quality Assurers, the Lead IQAs will be responsible for:

- Reporting to management twice per course intake
- Reporting statistical information i.e. achievements / leavers electronically twice per course intake to the course administrator
- Updating all assessors on the new policies and procedures within the centre
- Contacting all IQAs on a regular basis
- Keeping up to date with all changes in SFA funding, if required
- Maintain master copies of all verification documentation
- Attending meetings etc on behalf of management when requested
- Carry out appraisals, probationary reviews and one to ones for the quality assures they are responsible for
- EQA report action plans, reports from main contractors etc are fed into the continuous improvement plan
- Establish trends and patterns and ensure this data is fed back into quality assurance arrangements
- Analyse and interpret evaluation documents from learners on a three monthly basis

## **Standardisation**

Internal quality assurers must hold standardisation meetings across the vocational areas to update assessors, feedback from EQA visits, share best practice and conduct standardisation exercises to ensure the rigour and consistency of assessment decisions. Appa Training expects these meetings to be scheduled at least yearly and communicated to a staff to allow for diaries to be coordinated agendas and minutes must be documented and maintained. All agendas must include standardisation exercises and activities to address any issues identified during verification. Assessors are expected to attend at least three meetings per year. Internal Quality Assurers are expected to attend these meetings.

## **Resource Management**

It is expected IQAs will monitor day to day provision of resources including human resources. Any additional requirement will be reported to management. Expectations of resources required are:

- Resources allocated need to achieve the standards of the qualification being delivered and made available to learners
- Requirements which are particular such as a learner on a specific shift pattern have an allotted assessor that can undertake assessment at these hours
- Laptops and other IT and electronic equipment are well maintained and kept up to date with all software updates
- Allocating experienced assessors to working towards or new assessors to the centre appropriately
- Time and opportunity is made available for workplace visits by assessors and IQAs
- Adequate time is allotted to IQAs for contact with a percentage of learners
- Access to appropriate qualification specification standards to be made available to assessors
- Standard documentation is available across the entire centre and used by all sections in a standardised way
- All personal data is stored and appropriately maintained



## Sampling Strategy

The internal quality assurance strategy covers the following list of factors:

- **Learners**

Ethnic origin, age, gender, special assessment requirements, new, midterm and completion of qualification, interviews

- **Assessors**

Ratio of assessor to learners, experience, workload, new to centre, qualification and occupational expertise, IQA feedback to assessors documentation completion, clear auditable trails, ghost files, observation of all stages of assessment

- **Methods of assessment**

Observation, questioning written and oral, witness testimonials both written and oral, production evidence, assignments, tests, professional discussion, invigilation

- **Evidence**

Across units, across specific problem areas any special assessment requirements

- **Records**

Learners portfolios, learners assessment records, tracking documents, apprenticeship paperwork, learners interviews, employers interviews

- **Assessment sites**

Workplace assessment sites, risk banded assessment sites, off the job assessment, classroom, other

To maintain quality within the centre and the qualification Learners will have their portfolio or other areas sampled during all stages of the assessment process. This does not mean that each learner or assessor has to have all of the processes stated below undertaken, moreover Quality Assurance 'may' be completed depending on the planning of the internal quality assurer based on the factors in the sampling strategy. The times and actions stated below are therefore flexible but based on good practice:

- Observation of induction – induction of learner onto programme
- Observation of invigilation – when learner is ready to undertake tests
- Observation of assessment process – as per planned observation for particular assessor
- Observation of teaching and learning – annually unless graded satisfactory whereby observation will be increased OR if new assessor / tutor

- Observation of sign off of qualification –End of learners programme
- Interview of learners
- Interview of employee
- Formative / Interim Sampling. Over a 3/5-month period from learners start date
- Formative / interim Sampling (if required as per rationale) 7/9 month period from learners start date
- Summative Sampling. When the candidate has completed the award

During sampling and within 12-month period all assessors will be monitored on all assessment methods used and all units per level of the award across all learners.

### **Formative / Interim Sampling**

This may include:

- Reviewing the portfolio structure
- Reviewing the effectiveness of assessment planning and reviews
- Reviewing candidate work before decisions have been made on any unit
- Reviewing the feedback give to candidates
- Reviewing a range of assessment methods
- Reviewing completed units and learner progress
- Highlighting good practice
- Identifying any training needs for assessors
- Developing assessors effectively, robustly but with integrity
- Interviewing employers
- Interviewing learners

### **Summative Sampling**

Reviewing the quality of the assessment decision made by the assessor must also ensure that the IQA is able to follow an audit train, which clearly demonstrates that the assessor has checked the evidence presented and that this evidence is:

- Valid (relevant to the standards for which competence is claimed)
- Authentic (produced by the candidate or witness)
- Reliable (accurately reflects the level of performance which has been consistently demonstrated by the learner)
- Current (Sufficiently relevant to be confident to the same level of skills/understanding/knowledge exists at the time of the claim)
- Sufficient (meets in full ALL the requirements of the standards)

## **Sampling strategy requirements**

The sample must include all assessment sites, all candidates and all units and the full range of the assessment methods etc as stated above. Assessment decision of all assessors must be sampled, with more assessment decisions of new or inexperienced assessors being sampled until reliable and consistent assessment practice has been demonstrated.

NB: it is rarely good practise to verify 100% of work, as this easily becomes a second line assessing. (However this could be considered with inexperienced assessors).

The sample size should present an accurate picture of the quality of assessment so that you can be confident that those decisions not sampled also meet national standards. IQAs must check that any action points identified through sampling that have been recorded have been addressed by the appropriate assessor during the following portfolio sampling and prior to an EQA visit and/ or prior to certification by Direct Claim Status.

The IQA Sampling Plan is a working document. It is the qualified IQAs responsibility to maintain the IQA Sampling Plan for all those learners that have been assigned to them for the purpose of IQA. The IQA is responsible for setting up a planned sample of units for each assessor that ensures:

- A sample is specific for each IQA event depending on the length of time qualified and competence level
- All learners are included
- All units and methods are eventually sampled across an NVQ (QCF)
- Where there is a known problem or concern with a unit the IQA samples this (in addition) until they are satisfied the quality is consistent
- Evaluation is recorded
- Information is recoded on sampling plan, using appropriate codes of units sampled
- Sampling also includes all of the observation necessities as above

## **IQA guidelines**

All IQA work should be planned in advance to ensure timescales are managed and met. Time should also be allocated to observe assessors and interview learners.

These dates should be planned in advance and assessors informed of the sampling required.

Assessors should submit units for verification at agreed intervals, based on learner start and projected end date. Assessors are responsible for ensuring that all portfolios, regardless of progress, are available for the IQA on their due dates. In exceptional circumstances assessors may be given up to five dates from this date, but only in agreement with their IQA and partners.

Portfolio work verified should be appropriately signed by the IQA. It is expected that a turnaround date not exceeding three weeks will need to take this into consideration when asking for assistance from their allocated IQA.

It is expected that all IQAs will be available for ad hoc queries and support whenever necessary. However it is important to remember that all IQAs will also have their own caseloads and therefore assessors will need to take into this consideration when asking for assistance from their allocated IQA.

IQA feedback records must be completed on every occasion. Good practice should be highlighted in relation to the assessment process and in the event of the unit sampled failing to satisfy the IQA, detailed corrective action must be included. Feedback to assessors should be given constructively and promptly, and assessors should ensure the appropriate action is taken and recoded on the feedback sheets. Referred units or other areas of concern should be actioned and returned promptly for verification or when the IQA has deemed it necessary to do so.

### **Observation of assessment**

Each assessor must be observed in their role at least once a year and the observation record completed. Unqualified assessors will be observed on a bi-monthly basis during their first six months of training and / or until qualified. Qualified assessors new to HTT must be observed within two months of starting. Observation of teaching will also be completed and graded as per OFSTED requirements.

Each internal quality assessor must be observed in their role at least once a year and the observation records completed. This will be completed by one of the partners or the lead IQA is appointed.

### **Referrals**

If an IQA is unsure of the response to any issue it should be referred to Management or if require the appropriate Awarding Organisation.

## External Quality Assurance Visits

It is an Awarding Organisations responsibility on behalf of OFQUAL to verify that assessment at approved centres is being carried out consistently, appropriately and to national standards.

The EQA visit is normally undertaken on a six monthly cycle unless otherwise notified. The EQA will contact the appropriate IQA (normally the lead IQA for the centre) and request the following:

- A full list of learners names
- The allocated assessor
- The allocated IQA
- The location of the learner
- The status of the learner i.e. new to programme, midterm, ready to claim or DCS
- The registration number
- The date of the registration

The IQA is responsible for sending out this list to the EQA. The EQA will respond with specific requirements such as who they would like to interview, which portfolios they want to see etc. The IQA will also be responsible for booking an appropriate room, liaising with learning, employers (if the EQA wants to visit a specific location) arranging for the appropriate assessors to be present, lunch if required, arranging for appropriate resources to be available i.e equipment to listen to electronic professional recordings and highlighting the visit to management.

The named IQA should have the following documents ready for the EQA on the day:

- All learners folders /portfolios for review
- All DCS folders
- Completed claim paperwork if required
- All policies and procedures of the centre
- Appropriate scheme specific information
- All IQA records
- Copies of /A/V/TAQA/IQA certificates
- Copies of all CPS and other certificates
- Minutes of meetings and standardisation records
- Last EQA report and any evidence of remedial action from previous visit
- Organisational chart and team details

- Other appropriate documentation
- Diary to plan the next visit

### **Post EQA visit**

- Lead IQA or named IQA to feedback immediately to management and the team of the outcomes of the visit
- Lead IQA / named IQA to take action on the points addressed by the EQA visit and report this back to management also
- Ensure all portfolios are returned to the appropriate assessor or learner
- Clear the room

### **Informing Awarding Organisation of Centre changes**

There will at times be a need to inform the Awarding Organisation of any changes. Normally this can be completed at the EQA visit. However it is the IQA responsibility to inform the awarding organisation of any pertinent changes if it is deemed important to do so before the next planned EQA visit.

### **One to One Sessions**

All assessors will attend one to ones with their allocated IQA. The timings of these will be determined within the Learners handbook, given to the assessor and to the learner at the start of the programme. Sessions will be held on mutually agreed dates.

The assessor will be expected to bring in portfolio of evidence. Functional skill and technical work books or other to the IQA on the mutually agreed dates that the IQA gives the assessor. This will be highlighted to the IQA via the sample planning and it is the responsibility of the assessor to ensure that the process for these is carried out in a timely manner. The one to ones will be documented and kept in a confidential folder. The one to one document will be standardised across all IQAs. One to ones will include the following:

- All parts of the qualification and how the assessor and learner is doing against set targets
- Development needs of the assessor
- Any issues raised by assessor
- Feedback to assessor personally, centre and others

- Future observation both NVQ and teaching and learning
- Future courses that might be appropriate
- Centre updates that the assessor may need to know

### **Retention of Portfolio form**

The retention of portfolios is stated by the awarding organisation. As a centre we cannot store all of these and so after EQA visit we will release these back to the learner, subject to AO requirements. It is an IQA responsibility to ensure that the assessors return these back to the learners and use the appropriate form.

## 4 Data Protection

*Please see separate appa Data Protection Policy and Code of Practise*



## 5 Assessments Procedure

Access to assessment framework is open irrespective of gender, race, creed, age or specific need and the formal entry requirements will be explained to each candidate prior to joining the course / programme.

Each assessment procedure varies depending on:

- Programme
- Awarding organisation assessment criteria
- Candidate need

Candidates will be given ample opportunity to train and register to undergo assessment.

The centre will ensure that all assessments are booked with adequate notification to the relevant awarding organisation and their guidelines for carrying out assessment/s are inexplicitly followed.

Candidates requiring additional time / support or alternative formats for accessing assessment will be highlighted to the awarding organisation.

Any assessment evidence and feedback information will be treated with the strictest confidence for each candidate and only discussed with assessors and IQA/EQAs.

## 6 Access to Fair Assessment

### Policy Statement

Please note. In this Policy, the terms “Employee” or “Staff” refer to: 1) Salaried staff; 2) Freelance contractors; and 3) those working in a voluntary capacity or on a placement. The term “Learner” applies to anyone undergoing a learning or assessment programme at Appa Training, whether it be a qualification programme, a skills and knowledge learning programme or a workshop or other CPD activity.

Appa Training is committed to giving all learners equal access and opportunity to demonstrate their achievements.

There may be circumstances whereby, to take account of particular learners requirements, arrangements will need to be made, which ensure that this is achieved without conferring any unfair advantage over other learners.

### Access arrangements

Access arrangements should be agreed before an assessment takes place. This allows learners with identified special educational needs, disabilities, or temporary injuries to access the assessment.

Access arrangements allow learners to show what they know and can do without changing the demands of the assessment, e.g. readers, scribes, word processors, and Braille question papers.

An Access arrangement that meets the needs of a disabled learner would be a “reasonable adjustment” for that learner.

### Reasonable Adjustments

Reasonable adjustments are adjustments made to an assessment for a qualification so as to enable a disabled learner to demonstrate his/her knowledge, skills and understanding to the levels of attainment required by the specification for that qualification.

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

Reasonable adjustments must not affect the reliability or validity of the assessment outcomes but may involve:

- Changing the usual assessment arrangements, e.g. allowing a learner extra time to complete an assessment activity
- Adapting assessment materials e.g. by providing course materials in BSL
- Providing assistance during an assessment e.g. by providing a signer, interpreter or a reader
- Changing the assessment method e.g. from a written assessment to a spoken/signed assessment
- Using assisted technology such as screen reading or a voice activated software
- Reasonable adjustments are approved and set in place before the assessment takes place. The work produced by the learner will be assessed in the same way as all other learners

### **Identification of learners who are eligible for reasonable adjustments**

Any adjustment to an assessment activity will be based on what the learner needs to access the assessment. Below are some examples of learner needs that may be adjustments to assessments. This list is not exhaustive and it should be noted that some learner needs will fall within more than one of the categories set out below.

- Communication and interaction needs
- Cognition and learning needs
- Sensory and physical needs
- Behavioural, emotional and social needs

The learner will be eligible for reasonable adjustments if their performance during an assessment is likely to be substantially affected by a particular impairment. Many of these learners will be defined as being disabled under the Disability Discrimination Act.

An adjustment to assessment should only be considered where the difficulty experienced places the learner at a substantial disadvantage, in comparison with persons who are not disabled. Where the difficulty is minor, the centre should assist the learner by offering help with study and assessment skills.

A learner does not necessarily have to be disabled (as defined by the Disability Discrimination Act) to be entitled to reasonable adjustments to assessment. Every learner who is disabled will also not necessarily be entitled to or need an adjustment to assessment. The learner may have developed coping mechanisms which minimise or remove the need for assistance.

### **Identifying and obtaining supporting evidence**

In order to ensure that any adjustment to assessment will only provide the learner with the necessary assistance without giving him or her an unfair advantage over others, Appa Training must be clear about the extent to which the learner is affected by the disability or difficulty.

Where Appa Training can verify evidence of the disability or difficulty and where the implications are clear, such as for a learner with physical difficulties, profound hearing impairment or who are registered as blind or partially sighted, the centre does not need to provide further evidence of these physical difficulties.

Where the implications of the difficulty are not obvious, such as for learning difficulties, or mental health difficulties, the centre will have to provide additional evidence of the effect of the impairment on the learner's performance in the assessment. Any of the following types of evidence would be acceptable.

The centre should decide which of these will best assist understanding of the learner's situation:

- Evidence of assessment of the learner's needs in relation to the particular assessment, made within the centre by the relevant member of staff with competence and responsibility in this area; staff include learning support staff, teaching staff, trainers, assessors and other specialist staff. If necessary, external experts may be called upon to assess the learner. This evidence should include an indication of how the centre plans to meet the learner's needs and should show that the learner can cope with the level and content of the

assessment. The evidence should be documented for audit purposes.

Information from previous centres attended by the learner may also be included.

- History of provision within the centre. This should include information about the support received by the learner during the learning or training programme and during formative assessments. Evidence of the way in which the learner's needs are being met during the learning programme should be documented for audit purposes.
- Written evidence produced by independent, authoritative, specialists. This could take the form of medical, psychological or professional reports or assessments. These reports should state the name, title and professional credentials of the person who wrote the report. The report should set out the nature of the difficulty and extent to which the learner is affected by the difficulty, including the effects of any medication that the learner may be taking. In cases where it might be expected that there could be changes in the way the learner is affected by the difficulty, there will have to be recent and relevant evidence of assessments and consultations carried out by an independent expert.

It is Appa Training responsibility to ensure that all applications for reasonable adjustments are based on the individual need of the learner and that the evidence in support of the application is sufficient, reliable and valid.

Appa Training will maintain records of all cases for audit purposes and to monitor the effectiveness of the reasonable adjustments which have been made.

### **Special considerations**

Appa Training follows the Special Consideration Policy set out by Signature, our Awarding Body as shown below and on their webpage (<http://www.signature.org.uk/useful-documents>) (15 May 2020):

### **Signatures policy statement**

Signature aims to ensure that access to assessment is provided so as to maximise opportunity for as many learners as possible. As a general principle, Signature would wish to allow learners the same level of support during assessments as they have received during the learning process, providing that the support does not give

the learner any unfair advantage or disadvantage over others who do not have such support.

Special consideration may be given for learners who were ill on the day of the assessment, injured or indisposed at the time of an assessment, or where performance was affected by unforeseen circumstances, e.g. serious disturbance during the assessment.

To apply for a special consideration for a learner, centres should contact their Customer Support Officer by email or by fax, along with any of the below:

- an explanation/description of the circumstances; and evidence, where appropriate. If the application for special consideration is accepted in the light of the above information, Signature may:
  - review the learner's performance in the light of the evidence available and make a decision; or offer the learner the opportunity to re-sit the assessment at a suitable date; or reach an alternative solution, appropriate to the circumstances.

Requests for special consideration will not be accepted after the results of the assessment have been published. For further information please contact Signature's Customer Support Officer.

## 7 Appeals and Complaints

Appeals and complaints are taken seriously by appa Training.

### Appeals

Occasionally, things may go wrong, or you may experience circumstances outside of your control that may impact your academic assessment, award, or progression.

The admin team is responsible for dealing with student representations against their marks and overall results, and for appeals from students who have been informed by their departments that they must withdraw from a course.

#### Please note:

- **Appeals can only be made once official results have been issued by appa Training staff.**
- **Appeals cannot be based on dissatisfaction with academic provision:** if you have a complaint relating to academic provision, you need to raise this no later than **three weeks before** the examination or assessment affected takes place.

All appeals should be submitted by email within one month of receiving official notification of results.

### The Appeals Process

A formal appeal should only be made after the student has exhausted all informal means of resolving the issue.

Any student who wishes to make a formal appeal against an appa Training decision should submit the appeal via email within five working days of receiving notification of the decision. This should be sent to the Training Manager.

The letter of appeal should contain a statement which clearly states the decision which is being appealed, the basis for the appeal and the remedy the student is seeking. The letter of appeal may include new evidence to support the appeal for any personal circumstances that the student wishes to be considered.

appa Training Staff are available to assist the student in drawing up the appeals letter if required.

appa Training will normally acknowledge receipt of the appeal within 5 working days.

An appeal hearing will be held to give the student the opportunity to personally explain the basis of the appeal. The student will be given at least 3 working days notice of the date and time of the hearing.

The student has the right to be accompanied to the hearing by a friend or representative. appa Training should be notified of any person who will be accompanying the student at least one day before the hearing.

The appeal will be held by a nominated panel, normally chaired by a member of the Senior Management Team, within 10 working days of the letter of appeal being received. However, where this timescale is not practicable the period may be extended by mutual agreement.

No member of the appeals panel should have had direct involvement in the decision being appealed.

Normally the decision of the appeals panel will be given verbally to the student and confirmed in writing within 5 working days of the panel being held.

The decision of the appeals panel is final and, subject to the exclusions below, is not subject to further appeal within appa Training.

### **Further Appeals**

Any student who wishes to appeal further against the operation of the appeal process (but not the decision itself) can appeal to the Principal in writing

A review of the documentation will be undertaken to ensure that the Appeals panel has operated within appa Training process. If the principal decides that the process has not been followed correctly he may require a rehearing to be convened by a different panel.



On an unsuccessful appeal, the student may have the right to complain to the external awarding body. This however will be dependent on the Awarding Body's appeal process if indeed they allow appeals direct from students.

## Complaints

We ask that all complaints from candidates, learners, teaching faculty and external organisations in contact with appa me ltd who have need to raise a complaint or concern to take the following steps:

1. To communicate the details of your complaint or concern with the administration, via email
  - a. Methods of communication can be submitted in a format of the candidates choosing and attached and submitted by email
2. Await a formal response to discuss the issues further and receive potential resolutions
3. To reflect and agree on resolutions offered
4. To upon request review the implemented solutions

If this stage is not successful, individuals are encouraged to contact the Training Managing in writing, who will then review the issues and agree appropriate courses of action to resolve them.

## Formal Complaints Procedure

1. Submission – Formal submissions are made to the Designated Authority listed below. If you are not happy with the response you may escalate to the next level by submitting the complaint to the next Designated Authority. Complaints made within appa Training are replied to with within 5 working days and resolved within 4 weeks.
2. To remain within our accessibility policy appa will allow submission of a Comment, Complaint in the follow formats, via email (as attachments if needed):
  - i. Verbally – As a voice note, with or without support worker assistance;
  - ii. Written
  - iii. Easy Read - we will accept easy read formats from clients who wish to use this method;
  - iv. BSL - SSE - Makaton – As a recorded video, each submission made using this method will be transcribed to ensure a formal paper version exists
3. Authorisation - depending on the submission it will then be passed on to the correct Panel (also listed below) for resolution.

4. Acknowledgement - and additional responses will be made in the same format that the submission was made (along with a formal printed version for monitoring records).

<b><u>Escalation Level</u></b>	<b><u>Designated Authority</u></b>	<b><u>Panels *</u></b>
First	Course Administration	Teacher Course Administration
Second	Training Manager	Teacher Course Administration Training Manager
Final	Regulator	Ofsted

**Initial Response times and resolution will be as follows**

<b><u>Description</u></b>	<b><u>Within 5 working days</u></b>	<b><u>Within 4 weeks</u></b>
Comment	✓	
Complaint	✓	
Implement Agreed Actions		✓

Agreed actions will be signed off by the client / stakeholder and appa before being implemented.

All actions that are agreed will take into consideration:

- equality and access for clients and employee ability and skills to deliver the agreed actions
- effectiveness of the solution to resolve the issues and improve on the service
- cost implication and feasibility of financially supporting the new actions.

## 8 Deferral, Refund and Appa Credit Policy

### Policy Statement

We know that things can change after you've enrolled on a course. This policy lets you know when we can arrange a refund or Appa credit (to allow for deferrals), what you're entitled to, and how to make your request.

### Deferring or Switching Courses

1. If, you don't want to continue with your course and would like to request a change, you may be eligible for full or partial appa credit to put towards future courses at appa. You will need to let us know that you want to change before the 3rd session of your course has run; the sooner you tell us the more credit you will get. If private 1-2-1 session have already been taken this will be deducted from any refund or credit awarded.

If your request reaches us:

- a. before your course starts, we will give you Appa credit for the full amount that you paid.
  - b. after your course has started but before the 3rd session, we will charge you pro-rata for the sessions that have run and issue Appa credit for the rest of the fees that you paid.
  - c. after the 3rd session of your course has run, we unfortunately cannot issue you any Appa credit.
  - d. There are a small number of courses (generally our longer or accredited courses) where we're not able to offer this flexibility. For these courses it isn't possible for us to give you Appa credit, should you change your mind.
  - e. We process Appa credit requests as quickly as we can. Straightforward online requests will be processed within 24-48 hours, though others may take up to one week.
2. Reasons for appa credit will be divided into two categories
    - a. ones that the learner has no influence over ('extenuating circumstances') e.g.
      - i. Bereavement

- ii. Pregnancy
  - iii. Serious illness over an extended period of time
  
- b. ones that they have e.g.
  - i. Learner has not been able to collect appropriate evidence to progress at an adequate pace.
  - ii. The learner's skills levels have dropped in comparison with the skills demonstrated at pre-assessment and the learner is not keeping up with the class.
  - iii. Learner unable/not ready to attend/sit assessment (examination)
  
- 3. The need for appa credit may be identified by yourself or your teacher/assessor. If at any time during the learning programme you feel you may need to defer you must discuss this with your teacher/assessor as soon as you are aware of the problem.
- 4. If your teacher/assessor has a good reason why they feel it would be better for you to arrange for appa credit they will raise this with you directly.
- 5. At the initial meeting your Teacher/Assessor will help you fill in the form and will discuss:
  - a. Reason of deferral
  - b. Supporting documents (medical certificates etc)
  - c. Best course of action
  - d. Consequences – additional costs may be incurred depending on circumstances and these will be clearly explained to you.
  - e. Decision basis – if the teacher/assessor has recommended deferral they must provide a robust, written justification/assessment.
  - f. Plan to return to study/assessment

Your teacher/assessor will then pass the form and copies of any supporting documents to the Deferral Decision Maker (DDM) who may request a face-to-face meeting with you. The final decision will be made at the discretion of the DDM, who will confirm the outcome in writing to you within 14 days. This decision is final. If the Learner disagrees with this decision, they appeal this decision using the Appeal and Complaints Policy and Procedure.

### **Course is at the wrong level for you**

6. If you think that your course level is too high or too low, please speak to your tutor as soon as possible. If we agree that the level of your course is too high or too low, we'll try to move you to a more suitable course at any time, if one is available but cannot guarantee this or issue a credit or refund.
  - a. If you attended an interview before enrolling, and we advised you to do a course that is not the right level for you, we will try to move you to a more suitable course or issue you with Appa credit covering the full amount you paid for the course.

### **Making a request or asking for Appa credit**

7. To make any formal request or ask for credit please either:
  - a. Email: [learn@appa.me.uk](mailto:learn@appa.me.uk)
  - b. Post: appa, 307-313 Lewisham High Street, London, SE13 6NW

### **T&C for Credit**

8. Appa credit:
  - a. can be redeemed online, over the phone or in person
  - b. is valid for 1 year, after which it will automatically expire.
  - c. can only be used once, it is non- refundable and non-transferable.
  - d. cannot be transferred between students.

### **Course Refunds**

9. If you'd like a refund for your course, all you need to do, in most cases, is make the request, online, in writing or in person, at least one week (7 calendar days) before your course is due to start.
  - a. For a small number of courses (generally our longer or accredited courses) we'll need more notice. For these courses you'll need to make your request at least three weeks (21 calendar days) before your course is due to start. If this applies to your course we'll make it clear to you in the course outline and at interview, if one is required for your course.

- b. Please be aware that the amount you are refunded will be less than the amount you paid. We retain 20% of the course fee (minimum £10) in order to cover the administration costs and the loss of potential income. If you request more than one refund, the amount that we retain will be calculated separately for each individual course.
- c. We process refunds as quickly as we can. Straightforward online refund requests will be processed within 48 hours, though others may take up to three weeks.
- d. Refunds for cancelled courses are prioritised - we aim to do these within 48 hours and at least within one week of cancelling the course.
- e. We will always refund you using the same method of payment to the same payment ID. However, if you paid for your course in cash you will be refunded by cheque.

### **Requesting a refund**

10. To make any formal request or ask for credit please either:
  - a. Email: [learn@appa.me.uk](mailto:learn@appa.me.uk)
  - b. Post: appa, 307-313 Lewisham High Street, London, SE13 6NW

You'll get a full response within three weeks.

### **Unhappy with the course or experience at Appa**

11. We work hard to make sure that everyone has a great experience at Appa, but we know that things can go wrong. If the reason you are requesting a refund is because of a bad experience.
  - a. Please give us full details in writing of what went wrong and the reason behind you request, when you request your refund.
12. We will forward your refund request and feedback to the Head of Department for your course. Each request is considered on an individual bases, the feedback is investigated and you will receive an acknowledgement within 5 days and a full response within 20 days.
  - a. You may be asked for more detail or proof to back up the information given for us to be able to come to a fact based decision.

13. We reserve the right to refuse a refund or may decide to offer you a full or partial refund, or full or partial Appa credit depending on the circumstances.
14. All feedback is greatly appreciated and helps us to make improvements.

### **Requesting a refund due to a disability/learning difficulty**

15. If you are requesting a refund because you cannot attend your course due to a disability, we will give you a pro-rata refund for any sessions you haven't attended if:
  - a. you are unable to participate in or attend your course due to your disability;
  - b. or the nature of your course has adverse implications for you, due to your disability;
  - c. or you are unable to attend your course due to your role as a carer for someone who is disabled or who is elderly;
  - d. or we are unable to put in place the additional support you need, in order for you to remain on your course.

If you are unsure whether this applies to you please:

- e. Email: [learn@appa.me.uk](mailto:learn@appa.me.uk)
- f. Post: appa, 307-313 Lewisham High Street, London, SE13 6NW

You'll get a full response within three weeks.

### **Requesting a refund due to an illness, medical condition or injury that will prevent student from participating**

16. If you have an illness, medical condition or suffer an injury that means you can't take part in your course, we may offer you a full or partial refund, move you to a more suitable course or offer you full or partial Appa credit. We consider all requests on an individual basis, depending on the circumstances.

If you are unsure whether this applies to you please:

- a. Email: [learn@appa.me.uk](mailto:learn@appa.me.uk)
- b. Post: appa, 307-313 Lewisham High Street, London, SE13 6NW



You'll get a full response within three weeks.

### **Requesting a refund due to a bereavement**

17. If you've been affected by the death of a close relative or friend, and don't feel able to attend your course, we'll refund your fees or Appa credit in full. If you've already attended some sessions, we'll give you a pro-rata refund for the sessions that you were unable to attend.

### **Appa cancelling a course or a single session**

18. We'll only cancel a course as a last resort, for example if a tutor is unavailable or if we can't recruit enough students for the course to run. If we do need to cancel your course, and can't offer a suitable alternative, we'll refund you in full and give you £50 Appa credit to go towards your next course (valid for 1 year).

19. If we need to cancel a single session of a course, we'll try and make up for it with a 'catch-up' session.

- a. If we can't provide a catch-up session, or if you are unable to attend the catch-up session, you'll be entitled to a Appa credit for the value of the session lost.

20. Unfortunately, sometimes we have to cancel for reasons beyond our control and in these situations we cannot accept liability or issue refunds. Examples of this might include industrial action or severe weather.

### **Changes in course date, time, location or content after students have enrolled**

21. If we need to change the date, time, location or content of a course, after you have enrolled, we will contact you. If you can't or don't wish to attend we'll give you a full refund. If you have already attended some sessions, we will give you a pro-rata refund for the sessions you were unable to attend.

22. We reserve the right to change our tutors and can't issue a refund or Appa credit due to a change of tutor. Our tutors may have different teaching styles; however we guarantee a consistent quality of teaching on all our courses.

### **Refund request for reasons not covered by the above**

23. If your refund request doesn't fall within the areas listed above, it's possible that you're not eligible for a refund. Your request will be considered on an individual basis and, depending on the circumstances, we'll decide whether or not we can refund your course fees, either in full, partially or as Appa credit.

You'll get a full response within three weeks.

# Deferral Request Form

Please note:

- Please use this form to type in your details electronically.
- Learner & Teacher/Assessor to fill in pink boxes.
- (Note: Part C only needs to be filled in when the Teacher/Assessor has recommended the deferral.)
- Deferral Decision Maker (DDM – Internal Quality Assurer or Head of Services) to fill in the blue boxes.

Learner's name	
Teacher/Assessor's name	
Name of course	
Intake	
Current status (ie. which session/PRM Learner is on)	

Part A: Reason of deferral	Supporting document(s)

Part B: Best course of action	Approved by DDM (For office use only)

<b>Additional costs</b>	
Approved by DDM (For office use only)	

<b>Part C: Decision basis</b> – if the teacher/assessor has recommended deferral they must provide a robust, written justification/assessment.	Approved by DDM (For office use only)

<b>Part D: Plan to return to study/assessment</b>	Approved by DDM (For office use only)

**Declaration**

- I declare that the information given on the form is correct and complete to the best of my knowledge and belief
- I understand that if I am claiming a deferral and my circumstances change I am required to inform Appa as soon as possible
- I have submitted supporting evidence, where necessary, for a request due to a temporary disability, or if this is my first application due to an impairment with a substantial and long term adverse effect disability
- I understand that provision of false information or failure to inform Appa of changes to my circumstances could result in my examination results being declared null and void and a ban from taking qualifications for up to three years.

Signed (Learner):	Signed (Teacher-Assessor):
Date:	Date:

Signed (DDM):
Date:

## 9 Health & Safety

### Policy Statement

Please note. In this Policy, the terms "Employee" or "Staff" refer to: 1) Salaried staff; 2) Freelance contractors; and 3) those working in a voluntary capacity or on a placement. The term "Learner" applies to anyone undergoing a learning or assessment programme at Appa Training, whether it be a qualification programme, a skills and knowledge learning programme or a workshop or other CPD activity.

Appa Training will provide adequate control of health and safety risks arising from work activities provide information and instruction to staff and maintain safe and healthy working conditions.

Staff have certain responsibilities under Health and Safety law, and are asked to follow HSE advice and guidelines, see below:

### The Health and Safety Executive (HSE)

The HSE is the UK government body responsible for enforcing health and safety at work legislation. The HSE also plays a major role in producing advice on health and safety issues, and guidance on relevant legislation. The role of enforcement is split between HSE and local authorities depending on the business sector.

In addition, HSE conducts research into the effectiveness of regulations and other health and safety issues, consults with employers and employees representatives, and advises legislators and government on health and safety.

The HSE website contains a wealth of information and guidance on maintaining health and safety at work, and detailed advice on complying with health and safety regulations. The HSE website is: <http://www.hse.gov.uk/>

### Staff Responsibilities

It is not possible to detail every single health and safety issue that may arise on a day-to-day basis; therefore it is vital that staff and management are aware of their personal and collective responsibilities.

Please refer to the separate staff Health and Safety Procedure for further guidance. However, you should bear in mind the following:

## **Five Steps to Risk Assessment**

STEP 1: Look for the hazards

STEP 2: Decide who might be harmed and how

STEP 3: Evaluate the risks arising from the hazards and decide whether existing precautions are adequate or whether more should be done

STEP 4: Record the findings and inform staff. The assessment needs to be suitable and sufficient, not perfect. There is no need to show how it has been carried out.

STEP 5: Review the assessment from time to time and revise it if necessary, preferably on an annual basis or when significant changes are made to the workplace etc.

## **Health and Safety – Information and Training**

Staff and volunteers are to receive the following Health and Safety information and training as required: Emergency evacuation procedures; accident reporting; location of first aid treatment and facilities; arrangements for any health and safety problems relating specifically to their work.

## 10 Environment & Sustainability

### **Policy Statement**

appa Training is aware of the negative effect that companies can have on the environment and takes every possible preventable measure to ensure that our impact is minimal.

### **Re-cycle**

We actively re-cycle all materials where possible, material that is shredded is donated to a local community garden for composting.

We encourage the team and students to think twice before printing material and in the signature of company emails we encourage the same.

### **Carbon Footprint**

All staff are instructed to use the most friendly /direct routes, and minimise their carbon foot print where possible.

### **Review**

We annually review the impact appa Training has on the environment and are engaged with external consultations as to ascertain any methods we can adopt to further improve any negative impact we may have in our day to day operation on the environment.

## 11 Equality, Diversity and Reasonable Adjustments

### Policy Statement

Please note. In this Policy, the terms “Employee” or “Staff” refer to: 1) Salaried staff; 2) Freelance contractors; and 3) those working in a voluntary capacity or on a placement. The term “Learner” applies to anyone undergoing a learning or assessment programme at Appa Training, whether it be a qualification programme, a skills and knowledge learning programme or a workshop or other CPD activity.

Appa Training is committed to eliminating discrimination and encouraging diversity amongst our workforce and amongst the learners on our various training programmes.

Our aim is that our workforce and the composition of our classes will be truly representative of all sections of society and each employee or learner feels respected and able to give of their best.

To that end the purpose of this policy is to provide equality and fairness for all in our employment and our learning activities, and not to discriminate on grounds of gender, gender reassignment, marital status (including civil partnerships), race, ethnic origin, colour, nationality, national origin, disability, sexual orientation, religion or age.

### Discrimination

Appa Training opposes all forms of unlawful and unfair discrimination. The following are definitions of discrimination:

- **Direct discrimination:** When one person is treated less favourably than another on the above defined grounds
- **Indirect discrimination:** Where requirements, conditions or practices are put in place which affect all members of a group, but as a result one or more persons of that group are affected disproportionately to others.
- **Harassment:** When a person is violating another person’s dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for someone.
- **Victimisation:** When another person is treated badly, because they are currently involved in proceedings under equality legislation



## **Reasonable adjustment**

Appa Training aims to support all staff and learners in achieving their potential and this may mean different treatment in some occasions. Staff and learners are asked to inform Appa Training of any additional requirements they may have to allow them full access to what any Appa Training service or Appa Training as a workplace has to offer.

There may be requests that Appa Training cannot fulfil even with the best of intentions, for example making alterations to our premises, which may not be within our powers or financial means. In this case Appa Training shall seek to find an alternative solution that is satisfying to both the employee or learner and practically achievable by Appa Training.

Appa Training are also open to requests for adjustments for reasons other than disability, for example caring responsibilities or linguistic background.

## **Our commitment**

All employees and learners, whether part-time, full-time or temporary, will be treated fairly and with respect. Selection for employment, promotion, training or places on our various training programmes or any other benefit will be on the basis of aptitude and ability.

All employees and learners will be helped and encouraged to develop their full potential and the talents and resources of the workforce and the training programmes will be fully utilised to maximise the efficiency of the organisation.

- To create an environment in which individual differences and the contributions of all our staff and learners are recognised and valued
- Reasonable adjustments to the workplace and the learning environment will be made in consultation with the employee or learner
- We shall endeavour to use Access-to-Work and other funds that are dedicated to provide equal access for disabled and Deaf people at work or in education to cover any expenses related to reasonable adjustments

- Every employee is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated
- Every learner is entitled to a learning environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated
- Training, development and progression opportunities are available to all staff
- Equality in the workplace and the learning environment is good management practice and makes sound business sense
- We will review all our employment practices and procedures in addition to our programme enrolment and delivery processes to ensure fairness
- Breaches of this Equality and Diversity Policy will be regarded as misconduct and could lead to disciplinary proceedings
- This policy is fully supported by senior management and has been devised after consultation with staff and learners
- The policy will be monitored and reviewed annually
- The implementation of this policy is the responsibility of all staff at Appa Training, but any actions taken that affect Appa training budget or the work load of any other member of staff should always be discussed with those affected and agreed to by the Director
- Any complaint under the terms of this Policy will be treated seriously and will be the subject of an investigation by Appa Training
- Any person who feels that such an investigation has not dealt with the issue in a satisfactory way will have the right to invoke the Appa Training Grievance Procedure

## 12 Withdrawal of Qualification Policy

### Policy Statement

APPA ME LTD may consider the withdrawal of a qualification for the following reasons:

- Lack of learner registrations
- Lack of industry demand for the qualification
- Change in the skills required by the industry leading to a qualification not being fit for purpose.

APPA ME LTD will take all reasonable steps to protect the interests of the learner in relation to a qualification it withdraws.

Learners will be able to complete a qualification for which they have registered or will be given a reasonable amount of notice to complete the qualification.

Clear and accurate information will be provided to learners, centres and purchasers of a qualification that is to be withdrawn.

Transition arrangements will be published and provided to learners, centres and purchasers of a qualification that is to be withdrawn.

The APPA ME LTD recognises its responsibility to give reasonable notice to Signature for its intention to withdraw a qualification and will inform Signature of its intention prior to providing the information to learners, centres and purchasers of the qualification.

The APPA ME LTD will ensure its withdrawal plan for a qualification complies with requirements Signature has communicated in writing to it.

### Withdrawal procedures

Decisions to withdraw a qualification will be made by the chief executive. This decision will be made after consultation with the teaching staff and the main board of directors. Where appropriate, trainers and learners will be consulted.

A decision to withdraw a qualification will, in the first instance, be communicated in writing to Signature. APPA ME LTD will inform Signature of its provision made to support learners, centres and purchasers throughout the withdrawal period and will supply them with a copy of its transition arrangements.

Once notification from Signature is received, learners, centres and purchasers will be notified of the plans for withdrawal of the qualification and provided with clear and accurate information in the transition arrangements.

Once notification of withdrawal has been published, no further learners will be registered for the qualification, unless specific circumstances are included in the transition arrangements.

Notification of withdrawal of a qualification will normally be made at least 12 months before the final registration date.

## 13 Safeguarding Vulnerable Adults Policy

### A. Introduction

- a. This policy has been compiled to support appa staff identify and protect vulnerable adults that they are working or associated with, and forms the basis of appa safeguarding Vulnerable Adults Procedures. It identifies the governments issued guidance in 2000 'No Secrets' on developing and implementing procedures to protect Vulnerable Adults from abuse through, recognising its responsibilities towards our vulnerable adult clients, joint working, ensuring swift responses and consistent protection to adults who may be vulnerable to abuse.

### B. Purpose

- a. The purpose of this policy is to identify the responsibilities of appa and its staff towards its clients and to clearly explain the procedures supporting staff in their responsibilities when Safeguarding Vulnerable Adults.
- b. Safeguarding adults is everybody's business. Everybody, be it company, agency or government department who work with vulnerable adults have the responsibility to safeguard the wellbeing and safety of vulnerable adults in different ways. "Safeguarding" when viewed in its wider sense of promoting the safety, wellbeing and opportunities of adults forms part of core business for all statutory agencies, including appa, for example ensuring health and patient safety is the NHS responsibility, promoting independence and wellbeing is the responsibility of adults Social Care, and protection people from harm is the responsibility of the Police. For all professionals, "safeguarding" in its wider sense is part and parcel of everyday working life.
- c. Vulnerable adults will be placed at the centre of the Safeguarding Adults Procedure and outcomes will be sought that are consistent with the needs and wishes of the Vulnerable Adult.

### C. Who is a Vulnerable Adult?

- a. A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves, or protect themselves from harm, or from being exploited. This may be because they have mental health problem, a disability, a sensory impairment, are old and frail, or have some form of illness.

This may include:

- People with a learning disability
- People who experience mental ill health
- Disabled people
- Older people
- People who are experiencing short or long term illness

However, it is important to note that inclusion in one of the above groups does not necessarily mean that a person is implicitly vulnerable.

#### D. Recognising Vulnerable Adult Abuse – Definitions

##### E. Abuse

- a. Defining abuse is complex and rests on many factors. The term “abuse” can be subject to wide interpretation. However, abuse is defined in No Secrets as:

**“the violation of an individual’s human and civil rights by any other person or persons”**

- b. It may be physical, verbal or psychological, it may be an act of neglect, or occur where a vulnerable person is persuaded to enter into a financial or sexual transaction to which they have not, or cannot consent.
- c. Abuse may be perpetrated as the result of deliberate intent, negligence or ignorance.
- d. Whilst it is acknowledged that abuse can take different forms, a consensus view is that it can be determined in the following ways;
  - **Physical Abuse** – including hitting, slapping, pushing, kicking, misuse of medical/chemical restraining or inappropriate sanctions
  - **Sexual abuse** - including rape and sexual assault or sexual acts to which the vulnerable adult has not or could not consent and/or was pressured into consenting
  - **Psychological abuse** – including emotional abuse, threats of harm or abandonment, deprivation or contact, humiliation, verbal or racial abuse, isolation or withdrawal of services or supportive networks
  - **Financial or material abuse** – including theft, fraud, exploitation, pressure in connection with wills property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits
  - **Neglect and acts of omission** – including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or education services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
  - **Discriminatory abuse** – including racist, sexist, that based on a person’s disability, and other forms of harassment, slurs or similar treatment
  - **Institutional abuse** – repeated instances of poor care of individuals or groups or individuals through neglect or poor professional practise as a result of structures, policies, processes and practices within an organisation.

## **F. “Significant Harm”**

- a. “Significant Harm” means not only ill treatment but also the impairment of, or an avoidable deterioration in, physical or mental health; and the impairment of physical, intellectual, emotional, social, or behavioural development.

## **G. Location of Abuse**

- a. Abuse can take place in any context. It may occur when a vulnerable adult lives alone or with a relative. It may occur in nursing, residential or day care settings, in hospitals, custodial situations, support services into peoples own homes and other places previously assumed safe, or in public places.

## **H. Disclosures**

- a. The possibility of abuse can come to light in various ways, for example
  - An active disclosure of abuse by the vulnerable adult
  - A passive disclosure of abuse where someone’s attention is drawn to the symptoms of the abuse
  - A growing awareness that “something is not right”
  - An allegation of abuse by a third party
  - A complaint or concern raised by a vulnerable adult or a third party who doesn’t perceive that it is abuse
- b. When responding to disclosures we need to maintain good practise by:
- c. Accept what the person is saying – do not questions the person or get them to justify what they are saying – reassure the person that you take what they have said seriously
- d. Don’t ‘interview’ the person; just listen calmly to what they are saying. If the person wants to give you lots of information, let them. Try to remember what the person is saying in their own words so that you can record it later.
- e. You can ask questions to establish eh basic facts, but try to avoid asking the same questions more than once, or asking the person to repeat what they have said – this make them feel they are not being believed
- f. Don’t promise the person that you’ll keep what they tell you confidential or “secret”. Explain that you will need to tell another person but you’ll only tell people who need to know so that they can help

## **I. Responsibility of Safeguarding – ALERT**

- a. There are some key responsibilities and actions for anyone who identifies the possibility of abuse
  - b. These responsibilities must be addressed on the same day as the Alert is raised
- **Immediate protection** – take any immediate actions to safeguard anyone at immediate risk of harm, including summoning medical assistance
  - **Listen, reassure & support** – if the vulnerable adult has made a direct disclosure of abuse or is upset and distressed about an abusive incident, listen to what they have to say, and ensure they are given the support they need
  - **Detection & prevention of crime** – where there is evidence a criminal offence has taken place, or a crime may be about to be committed, contact the police immediately
  - **Record & preserve evidence** – preserve evidence through record, and take steps to reserve any physical evidence
  - **Report and inform**
    1. Refer to Adults Social Services as soon as possible and in all circumstance on the same day as the alert is raised
    2. Inform the office as soon as possible, reporting the disclosure, evidence and actions taken, i.e contact at Social Services, the office will then complete the following actions:
    3. a notification to the CQC
    4. where appropriate a notification to the ISA scheme
    5. creation of a RIDDOR report
    6. You will be asked (on the same day) to make a written record of what you have seen, been told or have concerns about. Try to make sure anyone else who say or heard anything relating to the concern of abuse also makes a written statement

the report will need to include:

- when the disclosure was made, or when you were told about / witnessed this incident/s
- who was involved, any other witnesses including service – users and other staff
- exactly what happened or what you were told, persons own words, keeping it factual and not interpreting what you saw or were told
- any other relevant information, e.g. previous incidents that have caused you concern

remember to:

1. include as much detail as possible
2. make sure the written report is legible and of a photocopiable quality
3. make sure you have printed your name on the report and that it is signed and dated



4. keep the report confidential, storing them in a safe place until it will be needed
7. in the case of physical or sexual abuse, **CONTACT THE POLICE IMMEDIATELY**. Ask their advice about what to do to preserve physical evidence.

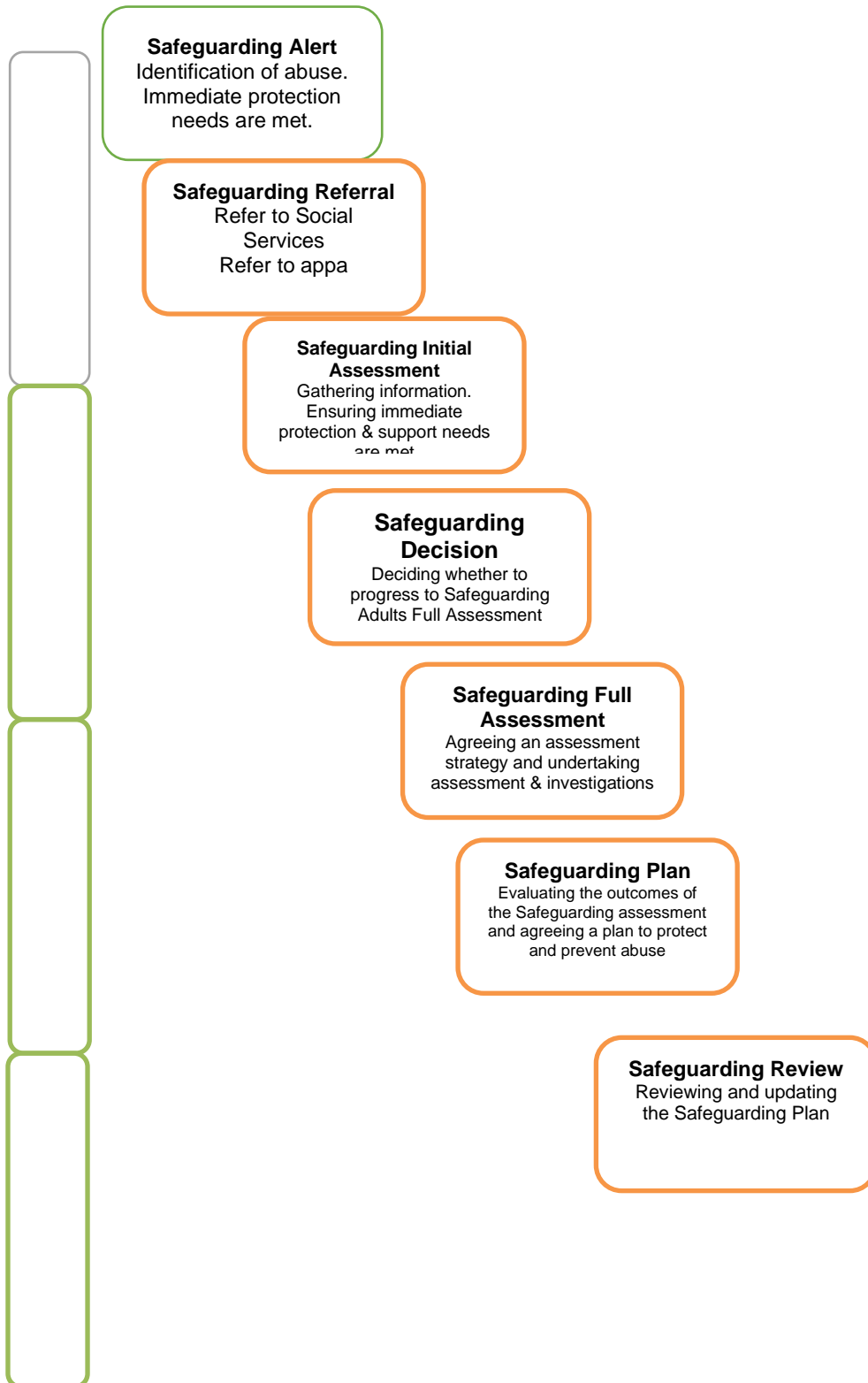
As a guide:

- Where possible leave things as and where they are. If anything has to be handled, keep this to an absolute minimum
- Do not clean up
- Do not touch anything you don't have to
- Do not throw anything away
- Do not wash anything, fibres, blood etc.
- Preserve the clothing and footwear of the victim
- Preserve anything used to comfort or warm the victim, e.g. a blanket
  
- Note in writing the state of the clothing of both the victim and alleged perpetrator. Note injuries in writing. As soon as possible, make full written notes on the conditions and attitudes of the people involved in the incident
  
- Take steps to secure the room or area where the incident took place. Do not allow anyone to enter until the Police arrive

In addition, in cases of sexual assault –

- Preserve bedding and clothing where appropriate, do not wash
- Try not to have any personal or physical contact with either the victim or the alleged perpetrator. Offer reassurance and comfort as needed, but be aware that anyone touching the victim or allied perpetrator can cross contaminate evidence.

## Overview of the Safeguarding Vulnerable Adults Procedure



## 14 Learner Code of Conduct

The purpose of the centre is to provide teaching, encourage learning and promote personal growth and skill acquisition. The centre embraces diversity and requires consideration, acceptance and courtesy in all behaviour.

The centre expects all staff and learners to show respect for one another in all aspects of their contact. This Code of Conduct includes the Regulations Governing Student Conduct and applies to all learners.

Any breach of the Code of Conduct will be taken seriously and where necessary dealt with through the Disciplinary Procedures. Sanctions against unacceptable behaviour will be applied consistently in the interest of everyone's learning, teaching and social experience.

This Code should underpin all interaction within the centre.

### **Expectations (Teaching Environment)**

In line with the centre core purpose, it is extremely important that the teaching environments allow learner to learn to their fullest potential.

Learners who do not meet these expectations may expect to be asked to leave and may also be subject to disciplinary action.

- A. Sessions should start on time and learner should arrive punctually since late arrivals are disruptive to other participants
- B. Access is not generally allowed after the start of the session. Latecomers may be refused entry, and should leave immediately, if requested. In the event that a learner wishes to leave during a session before its scheduled finished time, the prior agreement of the centre manager should be obtained, except in the case of departure necessitated by reason of illness or other unforeseen circumstance.
- C. No video or tape recording of any session should take place without the permission of the centre manager and other participants.
- D. Learner should not talk amongst themselves whenever anyone is addressing the class as a whole.
- E. All coursework and homework is to be completed and given in on time.
- F. If attendance falls below 75% you can be automatically failed\withdrawn from the course.

- G. Only bottled water, but no other food or drink may be taken into learning environments (unless specific permission is given, where learners have particular medical/dietary requirement, or the room is equipped with amenities)

### **Non-exhaustive examples of breaches of the Regulations for Learner conduct**

- A. The Disciplinary Procedure may be invoked if a learner is alleged to have committed any action which interferes with the achievement of the centres objectives as stated above, or which adversely affects the safety or well-being of the centre staff and./or learners and/or visitors, or which may bring the centre into disrepute. The following non-exhaustive list sets out examples of such misconduct
- B. Engaging in any conduct which prevents, obstructs or disrupts, or is intended to prevent, obstruct or disrupt:
- C. Teaching, learning, assessment or research carried out within the centre or on field work or on placement or similar
- D. The administration of the centre
- E. The discharge of duties or activities by any members of the centre staff or authorised visitor of the centre
- F. Behaviour either on or off centre premises which may bring the centre or any member of the centre into disrepute
- G. Obstructing, or attempting to obstruct, the access of staff, learners or members of the public (entering with the permission of the centre).
- H. Assaulting, sexually harassing or otherwise threatening or insulting any fellow learner, or member of the centre staff or authorised visitor on the centre.
- I. Misusing or damaging any learning materials (including computer misuse or unauthorised use), equipment, furniture, fittings, services, including fire alarms and fire extinguishers or property belonging to or under the control of the centre, or any learners or member of staff of the centre.
- J. Misappropriating any funds or assets of the centre, or of any member of staff or learner of the centre.
- K. Committing a breach of the regulations, rules, policies or codes of practise of the centre (or any part thereof), or disregarding the legitimate instruction of an authorised staff member of the centre.
- L. Invading or abusing, or attempting to invade or abuse, the secrecy, integrity or privacy of any files or confidential material held by the centre, including information held on the centre computer systems.

- M. Failing to comply with a penalty imposed within the terms of the Disciplinary Procedure for learners.

### **Unacceptable Behaviour Policy**

The centre recognises that bringing a complaint can be a stressful experience for Learners, but it also has a duty to ensure the safety and well-being of its staff. This policy sets out our approach to the minority of all complainants whose actions or behaviours we consider to be unacceptable

We expect you to use the established procedures and channels of communication to bring and resolve formal complaints, you can expect centre staff involved in your complaint to assist in its resolution in an impartial and fair manner.

We do not expect our staff to tolerate behaviour that we consider to be unacceptable, and will take action to protect our staff from such behaviour. We will, for example, not accept communication that is:

- a. Abusive, offensive or defamatory
- b. Aggressive, threatening, coercive or intimidating
- c. Unreasonably persistent or demanding

If a complainant's behaviour is deemed to be unacceptable, we will explain the reason(s) for this and will ask that the complainant modify their behaviour. If the unacceptable behaviour continues, we will be forced to take action to restrict the complainant's communication with the centre. Any decision on restricting access will be taken by any two of the following senior staff:

- a. Training Manager
- b. Facilitates Manager
- c. Managing Director

The complainant will be issued with a letter that sets out the reasons(s) their behaviour has been deemed unacceptable and the actions we will be taking. Any restrictions imposed will be appropriate and proportionate. The actions we are most likely to consider are:

- a. Requesting contact in a particular form (e.g. by letter only)
- b. Requiring that contact take place with a single, named individual (e.g. Head of Learner Services)
- c. Restricting telephone calls to specific days and times
- d. Asking the complainant to appoint a representative to correspond with us
- e. Asking the complainant to enter into an agreement about their conduct

Where a complainant behaves unacceptable during a telephone conversation, we may, as a last resort, terminate the call.

Where the behaviour is so extreme that it threatens the immediate safety and welfare of the centre staff or learners, we will consider other options, e.g. reporting the matter to the police or taking legal action. In such cases we may not give the complainant prior warning of that action.

## 15 Fees and Payments

For learners paying for the course through the centres credit arrangement agreement

- A. A non-refundable booking fee of £50 must be made at the time of application to secure your place on the course. This booking fee along with the first scheduled payment must be made no later than one week before the start date of your course. Following that, the following instalments must be made according to the credit arrangement as agreed.
- B. Requests to withdraw from a course or for refunds are will be dealt with following the policy in section 8 **Deferral, Refund and Appa Credit Policy**.
- C. Failure to pay the fees by these deadlines will result in blocked access to the training and where necessary the centre will engage legal advice to pursue outstanding debts.
- D. Administration fees for late payments will be incurred and added to the following instalment.

For learners paying the full course fees

- A. A non-refundable booking fee of £50 must be made at the time of application. The full course fee minus the £50 booking fee must be paid no later than two weeks before the start date of your course.
- B. Requests to withdraw from a course or for refunds are will be dealt with following the policy in section 8 **Deferral, Refund and Appa Credit Policy**.
- C. In the case of any withdrawal the centre reserves the right to charge for any materials given, training time and faculty costs.
- D. Extra cost such as; exam resits or an extra tutorial will be invoiced separately and will need to be paid for within 30 days or before a resit.

## 16 Marketing

Please be advised it is normal practise for photos and/or videos to be taken during sessions for the centres marketing purposes. Images and footage may be used on both/either websites or paper based marketing materials.

Any learner preferring not to have photos, videos, recordings or quotes used in this way should instruct us in writing before the commencement of their course start date.

Following the end of your training, the centre will retain learner details on a secure database for the purposes of administration, market research and mailing, by post or email, of our own publicity material from time to time. Learners can unsubscribe from mailing lists at any time.