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# Centre Policies

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# Complaints Procedure

**Definition of a formal complaint**

A formal complaint is an expression of dissatisfaction concerning Titan Development Centre (TDC) products or services, when the complainant has drawn their concern to the attention of one of the TDC’s employees and is not satisfied with the response.

**Making a formal complaint**

If you are dissatisfied with the way that your problem has been dealt with by a member of staff, we encourage you to ask to speak to the Head of Centre. You have the choice as to whether you wish to have your formal complaint dealt with by telephone, letter or e-mail.

If you prefer to have your complaint dealt with in writing, please forward details of the complaint to:

Michael Roberts

Head of Centre

Titan Development Centre

Barcroft House

Barcroft Street

Bury

BL9 5BT.

Or by email to: mike.roberts@titanrisk.co.uk

You should include as much information as possible, including the nature of the problem, the date the problem occurred and the details of who you have previously spoken to. You should also tell us what you feel the outcome of your complaint should be. Please remember to provide full details of the address where you would like the response to be sent.

Receipt of the complaint will be acknowledged on the same day that it is received by email. Letters will be sent out first class on the day of receipt.

We undertake to treat the complaint confidentially and to investigate it impartially and thoroughly. A written report will be sent within 10 working days, although every effort will be made to respond within 5 working days. Details of the investigation and our proposed remedial action will be included within the response.

Details of all complaints will be kept on file and used to assist staff training and annual performance appraisals.

If you remain unhappy after following our internal complaints procedure and your complaint refers to services you have received relating to your course and achieving your qualification, then please contact the Awarding Organisation directly. The Awarding Organisation is Highfield Qualifications and their complaint policy can be located on their website **www.highfieldqualifications.com** The HQ team can be contacted by letter, telephone or email using the information below.

Highfield Qualifications

Highfield ICON

First Point

Balby Carr Bank

Doncaster

DN4 5JQ

Telephone: 01302 363277

info@highfield.co.uk

Should you address your complaint to Highfield Qualifications and remain unhappy with the outcome, you may then raise your complaint to The Office of Qualifications and Examinations Regulation (Ofqual). The contact detail are as follows.

Ofqual

Spring Place

Herald Avenue

Coventry

CV5 6UB

Telephone: 0300 3033344

public.enquiries@ofqual.gov.uk

# Data Protection Policy

TDC needs to collect and use certain types of information about people with whom it deals with in order to operate. These include current, past and prospective employees, suppliers, clients and others with whom it communicates. This personal information must be dealt with properly, however it is collected, recorded or used, whether this be on paper, in a computer or recorded on other material. There are safeguards to ensure that this is in line with the Data Protection Act (incorporating the General Data Protection Regulations) 2018.

We regard the lawful and correct treatment of personal information by TDC as very important to successful operations and to maintaining confidence between those with whom we deal and ourselves. We ensure that our organisation treats personal information lawfully and correctly.

Under the data protection legislation there are six data protection principles that the Centre and all staff must always comply with in their data processing activities. In brief, the principles say that personal data must be:

* Processed lawfully, fairly and in a transparent manner in relation to the data subject (lawfulness, fairness and transparency);
* Collected only for a specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (purpose limitation);
* Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (data minimisation);
* Accurate and, where necessary, kept up to date; every reasonable step must also be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (accuracy);
* Not kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the personal data are processed (storage limitation);
* Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (integrity and confidentiality);
* The Centre is responsible for and must be able to demonstrate compliance with these data protection principles (accountability).

Therefore, TDC will, through appropriate management and the strict application of criteria and controls:

* Observe fully the conditions relating to the fair collection and use of information;
* Meet it’s legal obligations to specify the purposes for which information is used;
* Collect and process appropriate information and only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements;
* Ensure the quality of information used;
* Apply strict checks to determine the length of time information is held;
* Ensure that the rights of people about whom information is held can be fully exercised under the Act.

These include:

* The right to be informed that processing is being undertaken;
* The right of access to one’s personal data;
* The right to prevent processing in certain circumstances;
* The right to correct, rectify, block or erase information which is regarded as incorrect;
* Take appropriate technical and organisational security measures to safeguard personal information;
* Ensure that personal information is not transferred abroad without suitable safeguards.

In addition:

* Overall responsibility for Data Protection in TDC rests with the Managing Director, Simon McHardy;
* Everyone managing and handling personal information understands that they are contractually responsible for following good data protection practice;
* Everyone managing and handling personal information is appropriately trained to do so;
* Everyone is appropriately supervised;
* Anybody wanting to make enquiries about handling personal information knows what to do;
* Queries about handling personal information are promptly and courteously dealt with;
* Methods of handling personal information are clearly described;
* A regular review and audit is made of the way personal information is managed;
* Methods of handling personal information are regularly assessed and evaluated.

# Health and Safety Policy

It is the company responsibility to ensure the wellbeing of all TDC staff employed upon their premises under the Health & Safety at work Act 1974.

**Statement of Policy**

It is the policy of the company that all operations are conducted to ensure that as far as possible the Health & Safety of their employees and all persons likely to be affected by their operations, including sub-contractors and the public. This policy is the direct concern of the senior management and the Directors are accountable for its overall implementation.

The Directors will apply this policy through the Company’s operations and overall responsibility for this policy sits with the Managing Director, Simon McHardy. This policy will be reviewed annually.

On each site/venue the supervisor in charge is required to ensure that all employees observe the Company’s safety procedures. It is the function of the Management to provide the right environment in which to work in reasonable safety.

All employees have a legal duty to operate not only in a safe manner but also to co-operate in efforts made to create and maintain a safe environment.

**Policy Objective**

To achieve the following:

* To provide and maintain reasonably safe working conditions.
* That the Company’s operations are conducted as to prevent any injury to persons and to avoid damage to property.
* The observance that all staff receive adequate and appropriate training.
* To insist that all staff observe safe working conditions.
* The observance that all staff receive adequate and appropriate training.
* To institute proper reporting and investigation of incidents and damage with a view to achieving a reduction in accidents. Incident rates will be calculated by analyzing data.

# Appeals Procedure

The following sets out the appeals procedure for Titan Development Centre. This procedure covers the process for raising appeals against an academic judgement or assessment decision that has been made. Should a learner feel that proper process has not been followed or that the academic judgements or assessment decisions have not been made in accordance with the regulations of the programme of learning then they may appeal to Head of Centre via one of the following methods:

Call: 0161 740 1162

E-mail: mike.roberts@titanrisk.co.uk

Write to: Michael Roberts, Head of Centre, Titan Development Centre, Barcroft House, Barcroft Street, Bury. BL9 5BT.

Examples of areas where an appeal may be raised are as follows:

* If the learner believes that Titan Development Centre has not applied our procedures properly, consistently and fairly;
* If the learner is not satisfied with the conduct of the assessment and believed it disadvantaged them; and
* If the learner feels that the premises/environment for assessment has disadvantaged them.

(Should a learner wish to appeal against a decision made after a complaint has been investigated then please refer to our Complaints Procedure)**.**

When you contact us, please give us your full name, contact details, and include a daytime telephone number along with:

* A full description of your appeal (including the subject matter and dates and times if known);
* Any names of the people you have dealt with so far;
* Copies of any papers or letters to do with the appeal; and
* Any other factors for consideration such as any extenuating circumstances that the learner either did not address at the time or believes that were raised but were not taken into consideration when the decision was made.

Titan Development Centre ask that you raise your appeal as soon as possible after the event so that we have the opportunity to investigate fully. We will acknowledge receipt of your appeal within 2 working days.

Appeals will be investigated, and a review panel may be formed in order to reach a decision. We aim to investigate and respond to appeals within 5 working days following acknowledged receipt of your appeal.

This will be the final route of escalation within our company. Therefore, if you remain unhappy after following our own internal appeals procedure then please contact the Awarding Organisation directly. The Awarding Organisation is Highfield Qualifications and their appeals policy can be located on their website: [**https://www.highfieldqualifications.com**](https://www.highfieldqualifications.com)

Alternatively, please speak to the Highfield Qualifications team on 01302 363277.

Should you address your appeal to Highfield Qualifications and remain unhappy with the outcome you may then raise your appeal to the relevant qualification regulator. Either a representative of Titan Development Centre or Highfield Qualifications will be able to offer you guidance on the appropriate qualification regulator in each instance and provide contact details.

\*The following list of Qualification Regulators are provided as additional guidance:

* SCQF qualifications - SQA Accreditation
* RQF qualifications:
  + Delivered in Wales - Qualifications Wales
  + Delivered in Northern Ireland - CCEA Regulation
  + Delivered anywhere else – OFQUAL

Please note: SQA Accreditation cannot overturn academic judgements or assessment decisions.

If you have any queries about the contents of this policy, please contact Michael Roberts directly on 0161 7401162 or email mike.roberts@titanrisk.co.uk.

# Malpractice and Maladministration

### Introduction

This policy is aimed at our customers, including learners, who are delivering/registered on Titan Development Centre programmes or courses, approved qualifications or units within or outside the UK and who are involved in suspected or actual malpractice/maladministration. It is also for use by our staff to ensure they deal with all malpractice and maladministration investigations in a consistent manner.

It sets out the steps our centre, and learners or other personnel must follow when reporting suspected or actual cases of malpractice/maladministration and our responsibilities in dealing with such cases. It also sets out the procedural steps we will follow when reviewing the cases.

### Centre’s responsibility

It is important that all staff involved in the management, assessment and quality assurance of our qualifications, and learners, are fully aware of the contents of the policy and we have arrangements in place to prevent and investigate instances of malpractice and maladministration.

### Definition of Malpractice

Malpractice is essentially any activity or practice which deliberately contravenes regulations and compromises the integrity of the internal or external assessment process and/or the validity of certificates.

It covers any deliberate actions, neglect, default or other practice that compromises, or could compromise:

* the assessment process;
* the integrity of a regulated qualification;
* the validity of a result or certificate;
* the reputation and credibility of [centre name] or,
* the qualification or the wider qualifications community.

Malpractice may include a range of issues from the failure to maintain appropriate records or systems, to the deliberate falsification of records in order to claim certificates.

For the purpose of this policy this term also covers misconduct and forms of unnecessary discrimination or bias towards certain or groups of learners.

### Definition of Maladministration

Maladministration is essentially any activity or practice which results in non-compliance with administrative regulations and requirements and includes the application of persistent mistakes or poor administration.

Examples of maladministration

* Persistent failure to adhere to our learner registration and certification procedures.
* Persistent failure to adhere to our centre recognition and/or qualification requirements and/or
* associated actions assigned to the centre
* Late learner registrations (both infrequent and persistent)
* Unreasonable delays in responding to requests and/or communications from regulators, Awarding Organisations or learners.
* Inaccurate claim for certificates
* Failure to maintain appropriate auditable records, e.g. certification claims and/or forgery of evidence
* Withholding of information, by deliberate act or omission.

Examples of malpractice

* Failure to carry out internal assessment, internal moderation or internal verification in accordance with requirements
* Deliberate failure to adhere to learner registration and certification procedures.
* Deliberate failure to continually adhere to centre recognition and/or qualification approval requirements or actions assigned to your centre
* Deliberate failure to maintain appropriate auditable records, e.g. certification claims and/or forgery of evidence
* Fraudulent claim(s) for certificates
* Intentional withholding of information from us which is critical to maintaining the rigour of quality assurance and standards of qualifications
* Collusion or permitting collusion in exams/assessments
* Learners still working towards qualification after certification claims have been made
* Plagiarism by learners/staff
* Copying from another learner (including using ICT to do so).

### Process for making an allegation of malpractice or maladministration

Anybody who identifies or is made aware of suspected or actual cases of malpractice or maladministration at any time must immediately notify the Directors of Titan Development Centre. In doing so they should put them in writing/email and enclose appropriate supporting evidence.

* All allegations must include (where possible):
* Learner’s name and [centre name] registration number
* Titan Development Centre staff members name and job role - if they are involved in the case
* Details of the course/qualification affected or nature of the service affected
* Nature of the suspected or actual malpractice and associated dates details and outcome of any initial investigation carried out by the centre or anybody else involved in the case, including any mitigating circumstances

The Directors will then conduct an initial investigation to ensure that staff involved in the initial investigation are competent and have no personal interest in the outcome of the investigation.

In all cases of suspected malpractice and maladministration reported we’ll protect the identity of the ‘informant’ in accordance with our duty of confidentiality and/or any other legal duty.

### Confidentiality and whistle blowing

Sometimes a person making an allegation of malpractice or maladministration may wish to remain anonymous. if you are concerned about possible adverse consequences you may request that the Directors do not divulge your identity.

While we are prepared to investigate issues which are reported to us anonymously we shall always try to confirm an allegation by means of a separate investigation before taking up the matter with those to whom the allegation relates.

### Responsibility for the investigation

In accordance with regulatory requirements all suspected cases of maladministration and malpractice will be examined promptly by Titan Development Centre to establish if malpractice or maladministration has occurred and will take all reasonable steps to prevent any adverse effect from the occurrence as defined by Ofqual.

We will acknowledge receipt, as appropriate, to external parties within 48 hours.

Our Director will be responsible for ensuring the investigation is carried out in a prompt and effective manner and in accordance with the procedures in this policy and will allocate a relevant member of staff to lead the investigation and establish whether or not the malpractice or maladministration has occurred, and review any supporting evidence received or gathered by Titan Development Centre.

### Notifying relevant parties

Where applicable, our Director will inform the appropriate regulatory authorities if we believe there has been an incident of malpractice or maladministration which could either invalidate the award of a qualification or if it could affect another awarding organisation.

Where the allegation may affect another awarding organisation and their provision we will also inform them in accordance with the regulatory requirements and obligations imposed by the regulator Ofqual. If we do not know the details of organisations that might be affected we will ask Ofqual to help us identify relevant parties that should be informed.

### Investigation timelines and summary process

We aim to action and resolve all stages of the investigation within 10 working days of receipt of the allegation.

The fundamental principle of all investigations is to conduct them in a fair, reasonable and legal manner, ensuring that all relevant evidence is considered without bias. In doing so investigations will be based around the following broad objectives:

* To establish the facts relating to allegations/complaints in order to determine whether any irregularities have occurred.
* To identify the cause of the irregularities and those involved.
* To establish the scale of the irregularities.
* To evaluate any action already taken
* To determine whether remedial action is required to reduce the risk to current registered learners and to preserve the integrity of Titan Development Centre and the qualification.
* To identify any adverse patterns or trends.

The investigation may involve a request for further information from relevant parties and/or interviews with personnel involved in the investigation. Therefore, we will:

* Ensure all material collected as part of an investigation must be kept secure.
* If an investigation leads to invalidation of certificates, or criminal or civil prosecution, all records and original documentation relating to the case will be retained until the case and any appeals have been heard and for five years thereafter.
* Expect all parties, who are either directly or indirectly involved in the investigation, to fully co-operate with us.

Either at notification of a suspected or actual case of malpractice or maladministration and/or at any time during the investigation, we reserve the right to withhold a learner’s, and/or cohort’s, results.

Where a member of Titan Development Centre staff or a Titan Development Centre associate is under investigation we may suspend them or move them to other duties until the investigation is complete.

Throughout the investigation our Director will be responsible for overseeing the work of the investigation team to ensure that due process is being followed, appropriate evidence has been gathered and reviewed and for liaising with and keeping informed relevant external parties.

Investigation report

After an investigation, we’ll produce a draft report for the parties concerned to check the factual accuracy. Any subsequent amendments will be agreed between the parties concerned and ourselves. The report will:

* Identify where the breach, if any, occurred.
* Confirm the facts of the case.
* Identify who is responsible for the breach (if any)
* Confirm an appropriate level of remedial action to be applied.

We’ll make the final report available to the parties concerned and to the regulatory authorities and other external agencies as required.

If it was an independent/third party that notified us of the suspected or actual case of malpractice, we’ll also inform them of the outcome – normally within 10 working days of making our decision - in doing so we may withhold some details if to disclose such information would breach a duty of confidentiality or any other legal duty.

If it’s an internal investigation against a member of our staff the report will be agreed by the Managing Director, along with the relevant internal managers and appropriate internal disciplinary procedures will be implemented.

### Investigation outcomes

If the investigation confirms that malpractice or maladministration has taken place we will consider what action to take in order to:

* Minimise the risk to the integrity of certification now and in the future.
* Maintain public confidence in the delivery and awarding of qualifications.
* Discourage others from carrying out similar instances of malpractice or maladministration.
* Ensure there has been no gain from compromising our standards.

The action we take may include:

* Imposing actions in order to address the instance of malpractice/maladministration and to prevent it from reoccurring
* In cases where certificates are deemed to be invalid, inform the Awarding Organisation and the regulatory authorities concerned as to why they are deemed invalid. Further, inform the Awarding Organisation and the regulatory authorities concerned of any action to be taken for reassessment and/or for the withdrawal of the certificates. We will also let the affected learners know the action we’re taking and that their original certificates are invalid and ask – where possible – to return the invalid certificates to Titan Development Centre
* Informing relevant third parties (e.g. funding bodies) of our findings in case they need to take relevant action in relation to the centre.

In addition to the above the Director will record any lessons learnt from the investigation and pass these onto relevant internal colleagues to help prevent the same instance of maladministration or malpractice from reoccurring.

If the relevant party (ies) wishes to appeal against our decision to impose sanctions, please refer to our Complaints Procedure.

# Child and Vulnerable Adults Safeguarding Policy

The purpose of this policy is to protect people, at risk adults and beneficiaries of assistance from any harm that may be caused due to their encountering Titan Development Centre. This includes harm arising from:

* The conduct of staff or personnel associated with TDC;
* The design and implementation of TDC programmes and activities.

The policy lays out the commitments made by TDC and informs staff and associated personnel of their responsibilities in relation to safeguarding.

This policy does not cover:

* Sexual harassment in the workplace which is covered under TDC’s Anti Bullying and Harassment Policy;
* Safeguarding concerns in the wider community not perpetrated by TDC or associated personnel.

In the United Kingdom, safeguarding means protecting peoples’ health, wellbeing and human rights and enabling them to live free from harm, abuse and neglect.

In our sector, we understand it to mean protecting people, including children and at-risk adults, from harm that arises from coming into contact with our staff or programmes.

**Policy Statement**

TDC believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. TDC will not tolerate abuse and exploitation by staff or associated personnel.

This policy will address the following areas of safeguarding as appropriate: child safeguarding; adult safeguarding; protection from sexual exploitation and abuse. These key areas of safeguarding may have different policies and procedures associated with them.

TDC commits to addressing safeguarding throughout its work through the three pillars of prevention, reporting and response.

Prevention

Titan Development Centre will:

* Ensure that all staff have access to, are familiar with and know their responsibilities within this policy;
* Design and undertake all it’s programmes and activities in a way that protects people from any risk of harm that may arise from their coming into contact with TDC. This includes the way in which information about individuals on our programmes is gathered and communicated;
* Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel;
* Ensure staff receive training on safeguarding at a level commensurate with their role in the organisation;
* Follow up on reports of safeguarding concerns promptly and according to due process.

Child Safeguarding Responsibilities

TDC staff and associated personnel must not:

* Engage in sexual activity with anyone under the age of 18;
* Sexually abuse or exploit children;
* Subject a child to physical, emotional or psychological abuse or neglect;
* Engage in any commercially exploitative activities with children including child labour or trafficking.

Adult Safeguarding Responsibilities

TDC staff and associated personnel must not:

* Sexually abuse or exploit at risk adults;
* Subject an at risk adult to physical, emotional or psychological abuse or neglect.

Protection from sexual exploitation and abuse

TDC staff and associated personnel must not:

* Exchange money, employment, goods or services for sexual activity;

# Equal Opportunities, Equality and Diversity Policy

## Equal Opportunities Policy

The Company is committed to being an equal opportunity employer and firmly believes in treating all employees and job applicants fairly and equally.

**Commitment**

As such the Company will do its best to only evaluate employees and job applicants on the basis of their ability, competencies, experience and qualifications when making decisions regarding promotions, training and employment. At no point will factors (known as protected characteristics) regarding race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, pregnancy, maternity, marital or civil partnership status or disability be a part of any such decisions.

The Company will do its best to ensure that the working environment is free from bullying and harassment of any kind. Particularly in relation to factors regarding race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, pregnancy, maternity, marital or civil partnership status or disability.

Employees, associated service providers and all visitors to the Company’s premises or those attending training or activities arranged by or facilitated by the Company are obliged to uphold the elements of this policy in order to play their part in making sure that the workplace is free from discrimination, bullying or harassment.

The Company will not tolerate any act of bullying or harassment from its employees, clients, suppliers or other parties who interact with the business.

**Consequences of action**

If an employee is found to have bullied, harassed or discriminated against an employee or potential employee the matter will be treated seriously and dealt with as potential gross misconduct under the disciplinary procedure. Service providers found to have breached this policy will have their service provision suspended further to investigation by the Company. Visitors or those attending Company staged events or training who have been found to breach this policy will be suspended and removed from the specified provision that they are attending.

You should also be aware that committing an act of discrimination or harassment might result in a civil case being brought against you and that acts of serious harassment can also be regarded as a criminal offence.

You have a responsibility to report any issue of suspected discrimination, bullying or harassment to the office. It is not appropriate to become involved in the situation or to discriminate against a fellow employee who has made an allegation or had allegations made against them. Management will deal with it appropriately.

**There are 2 types of discrimination**

**Direct discrimination**

Is where someone’s employment, promotion or training is put at a disadvantage based on one or more of the factors listed above. This may happen intentionally or unintentionally.

This also applies if the discrimination is in relation to a protected characteristic of a third party who is connected to the individual and if it a perception that the individual has a protected characteristic – whether or not they do or don’t.

**Indirect discrimination**

Is where someone’s employment is subject to unjustified provision, criteria or practices which e.g. someone with a disability would find more difficult to meet.

Such provision, criteria or practice may appear to be fair but a lot of thought must go into each area to ensure that you don’t unwittingly discriminate.

**Action**

You have a responsibility to do your utmost to uphold the non-discriminatory practices of the Company and, on the other hand, if you believe that you may have been discriminated against you should raise the matter through the Company's grievance procedure.

# Recognition/Accreditation of Prior Learning

As part of our commitment to quality assurance, Titan Development Centre seeks to provide learners with guidance and support to help them achieve their learning and development goals while meeting any regulatory requirements.

Our policies are reviewed on a regular basis to ensure that they remain fit for purpose. This policy concerns prior learning and recommends ways that a learner can meet any requirements while avoiding the repetition of learning and assessment.

**Qualifications in Scope**

This policy applies to all qualifications being delivered by the Centre.

**Policy Statement**

Recognition of Achieved Prior Learning (APL) is a method of assessment that considers whether learners can demonstrate that they can meet the assessment requirements for a unit of learning through knowledge, understanding or skills that they already possess, removing the need for retraining, further study or assessment in that area. APL enables recognition of achievement from a range of activities using any appropriate assessment methodology. Provided that the assessment requirements of a given unit or qualification have been met, the use of APL is acceptable for accrediting a unit, units or a whole qualification.

Evidence of learning must be:

* Valid;
* Authentic;
* Sufficient;
* Current;
* Reliable.

Radius Training encourages the use of APL where it is of value to the learners and organisation in facilitating assessment.

Terminology

APL policies and procedures have been developed over time which has led to the use of a number of terms to describe the process and type of learning recognised. Among the most common terms are:

* Recognition of Prior Learning (RPL);
* Accreditation of Prior Experiential Learning (APEL);
* Accreditation of Prior Achievement (APA);
* Accreditation of Prior Learning and Achievement (APLA).

**Principles of APL**

Principle 1

APL is a valid method of enabling individuals to claim credit for units, irrespective of how their learning took place. There is no difference between the achievement of the learning outcomes and assessment criteria of a unit through prior learning or through a formal programme of study.

Principle 2

APL policies, processes, practices and decisions should be transparent, rigorous, reliable, fair and accessible to individuals and stakeholders to ensure that users can be confident of the decisions and outcomes of using APL to meet unit outcomes.

Principle 3

APL is a learner-centred, voluntary process. The individual should be offered advice on the nature and range of evidence considered appropriate to support a claim for credit through APL. They should also be given guidance and support in making a claim in conjunction with the Centre.

Principle 4

The process of assessment for APL is subject to the same quality assurance and monitoring standards as any other form of assessment. The award of credit through APL will not be distinguished from any other credits awarded.

Principle 5

Assessment methods for APL must be of equal rigour to other assessment methods, be fit for purpose and relate to the evidence of learning. Credit may be claimed for any unit through APL unless the assessment requirements of the unit do not allow this, based on a rationale consistent with the aims and regulations of the framework.

APL is also of value to learners transferring across various learning programmes who have relevant learning but do not hold relevant credits or certificates. This may include learners transferring from NQF to QCF.

Amplification.

APL can be used where a learner has not had their prior learning formally recognised. If a learner has certificated learning, then they should apply for an exemption, not APL.

APL focuses on assessment and awarding of credit for prior learning which may count as evidence towards:

* A unit accumulated towards a full qualification;
* A unit or units recognised by a Certificate of Achievement;
* A full qualification where units are assessed against assessment criteria, then all evidence must be evaluated using the stipulated criteria.

In assessing a unit using APL, the assessor must be satisfied that the evidence produced by the learner meets the assessment standard established by the learning outcome and its related assessment criteria. Subject areas must have personnel with the appropriate expertise and knowledge to facilitate this and the internal verification/quality assurance process.

It is expected that in most cases APL will be used for units. It is acceptable to claim for an entire qualification through APL although this is not the norm. It would however be unusual for a learner to be able to offer prior achievement that completely matches every aspect of a qualification’s assessment requirements. The prior achievement that would provide evidence of current knowledge, understanding and skills will vary from sector to sector. It will depend on the extent of the experience, technological changes and the nature of the outcome claimed. If the currency of any evidence is in doubt, the assessor may use questions to check understanding and competence. It is important to note that the assessment strategy for each qualification must be adhered to.

The APL process is not concerned with allowing for exceptional entry to, or exemption from, a programme of study. The APL process does not allow the recognition of any unit assessed by external assessment because such units are subject to specific evidence requirements.

It is essential that:

* Learners are registered as soon as they formally start to gather evidence;
* Records of assessment are maintained, as for any other unit/qualification;
* All relevant evidence is assessed before assessment decisions are confirmed;
* There are designated personnel with the appropriate expertise to support and quality assure the APL process;
* Certification and claims are made according to normal procedures

# Special Consideration and Reasonable Adjustments Policy.

Statement

Titan Development Centre’s policy on assessment is to give all learners equal access and opportunity to demonstrate their achievements. This is to ensure that arrangements are made to take account of particular requirements, without giving unfair advantage over other learners. Through this, Titan Development Centre aims to ensure that learner achievement is properly represented to other relevant bodies, such as employers and educational establishments.

To support this policy, Titan Development Centre takes advice from relevant professional bodies for example those with expertise in disabilities and learning difficulties. Titan Development Centre continues to develop and refine its practice through regular review and feedback from these bodies as well as from centres, learners and external moderators.

Titan Development Centre and the Awarding Organisation qualifications are developed to national standards of knowledge, skills and competences. These are defined in the units of assessment as learning outcomes and assessment criteria. The assessment grids or benchmark assessments and/or where appropriate external assessments, ensure that the required standards are met; these cannot be altered outside of Titan Development Centre’s qualification approval processes.

## 1. Reasonable Adjustments

Reasonable adjustments may be made/requested, for learners with particular requirements. The nature of any reasonable adjustments depends on the particular requirements as well as on the programme of learning and assessment methods, and its implementation is appropriate at all levels of achievement.

Reasonable adjustments are generally not appropriate where the learner’s particular difficulty directly affects performance in the actual attributes to be assessed. It should also be noted that reasonable adjustments would not be needed by ever learner at Entry Level.

Advice on any subject specific information regarding learners with particular requirements should be found in the relevant qualification guide.

For reasonable adjustments to be made, a JCQ/SC Form 10 will need to be completed.

Reporting on the approval and the implementation of reasonable adjustments will be included in the E V report.

## Centre responsibilities

* The centre is responsible for choosing an appropriate qualification and/or unit of a qualification for the learner whose skills can be independently demonstrated by that qualification and/or unit of a qualification.
* Any particular requirements of an individual learner must have been recognised by the centre currently making appropriate provision. The arrangements proposed must reflect the learner’s normal way of working. The learner should therefore have experience of and practice in the use of any arrangement proposed for the reasonable adjustment for assessment, unless the need arises from a temporary injury or condition.
* The centre must ensure that the reasonable adjustments will assist the learner to demonstrate attainment without affecting or circumventing the assessment requirements for the qualification and/or unit of a qualification. Learners cannot be given credit for skills they are unable to demonstrate independently.
* The centre is asked to record the details of all reasonable adjustments that are used at the discretion of the centre. This record must be brought to the attention of the Quality Reviewer and a representative sample presented for verification.

Titan Development Centre has differentiated between reasonable adjustments that can be used at the discretion of a Centre, and those that require permission from AOs.

## Arrangements which can be used at the discretion of the Centre

The centre Officer responsible for the qualification may make any of the following arrangements for a learner, without application to the Quality Reviewer, provided that such arrangements do not confer an unfair advantage.

* Low vision aids, overlays
* Brailing of non-secure assessment material
* Amplification, taped questions and responses
* Supervised rest breaks
* Use of a Reader\*
* Use of an Amanuensis\*
* Use of a Practical Assistant\*
* Use of a Communicator\*
* Bilingual dictionaries with an allowance of additional time
* Transcription of a learner’s written responses
* Word processor
* Use of a Prompter
* Prior modification of external assessment papers. Titan Development Centre will have received the External Assessment Pack as part of the set of documents. Any necessary photocopying onto coloured paper or other modification for an individual learner, such as change of font for ease of reading, etc. can be carried out before the assessment takes place, as long the modification is carried out under secure conditions.

\* A description of the activities allowed by each type of helper is described below.

## Readers, Amanuenses, Communicators and Practical Assistants

When a Reader, an Amanuensis or a Communicator assists a learner, help must not be given with the subject matter being assessed. This support must not give the learner an unfair advantage or disadvantage. It must not invalidate the assessment. Additional time may also be available and a separate room will be necessary if the learner is to dictate responses. The Head of Centre should ensure that Readers, Amanuenses and Communicators and Practical Assistants are acceptable and responsible adults, familiar with the subject matter being tested and have worked with the learner before the examination. A relative of the learner may not act as a Reader, Amanuensis or Communicator.

**Readers**

A Reader is required to read, on request, all or part of the assessment or any part of the learner’s response. The Reader must read accurately and at a reasonable rate. The Reader may repeat as necessary any instructions given on an assessment, as well as the questions and answers already recorded. The Reader may assist a visually impaired learner using tactile diagrams, graphs and tables to obtain the information, which the printed paper would give to a sighted learner. The Reader must, if required, spell out any word, which occurs in the assessment. In addition, in Entry Level Assessments a Reader may decode certain terms in order to give the learner access to the assessment but no explanation of technical terms may be given. The Reader must be prepared for periods of inactivity. In English, Welsh, Irish and Other Languages, the Reader must not be used for any reading test.

## Amanuenses

An Amanuensis is required to write out answers given by the learner. The Amanuensis must be able to write legibly or type, at a reasonable speed and should have a working knowledge of the subject. The Amanuensis must write down the answers exactly as they are dictated. The Amanuensis must draw or add to diagrams strictly in accordance with the learner’s instructions. The learner will not be expected to indicate spellings. The Amanuensis should work at the learner’s pace. In English, Welsh, Irish and Other Languages, the Amanuensis must not be used for any writing test.

**Communicators**

A Communicator is required to communicate questions to the learner upon request. A Communicator should use a means of communication which is appropriate to the needs of the learner and may include saying a word or phrase; rephrasing orally; use of the appropriate signing mode; writing. The Communicator should give the essence of the learner’s signed response in the assessment without inferring any meaning that was not clear in the signed response. Learners who are signing their responses must not be in a position to see other learners’ signed responses. The Communicator should work at the learner’s pace. In English, Welsh, and Irish Speaking and Listening Tests and Other Languages Speaking Tests, the Communicator must not be used.

## Practical Assistants

A Practical Assistant is required to help a learner in Practical Assessments, to carry out tasks at the learner’s instruction and ensure the safety of the learner. This support must not give the learner an unfair advantage. The Practical Assistant must work strictly in accordance with the learner’s instructions and should not perform tasks independently of the learner.

## Arrangements which require permission from Titan Development Centre

Arrangements, other than those listed above will require permission from Titan Development Centre and the Awarding Organisation and applications for these must be submitted in writing.

Internal Assessment

Arrangements that require Titan Development Centre and the Awarding Organisation permission include alteration to given assessment methods and/or arrangements and/or significant deviations from the Benchmark Assessments[[1]](#footnote-1) where they exist, see individual qualification guide for units. The Centre must put in writing the particular requirements of the learner and the proposed arrangements to the Quality Reviewer, who will have authority to give approval to the proposed alterations to the assessment methods.

External Assessment

Arrangements could include requesting external assessment tasks in Braille or large print or sans serif font (for registered dyslexics). Titan Development Centre will provide, on request, special versions of external assessment. Requests for these on a JCQ/SC Form 10 must be included at the time learners are registered for external assessment, at least fifteen working days prior to the external assessment being taken.

## Special Considerations

The overall principles of the policy are that the Special Considerations claimed:

* Do not give learners an unfair advantage over other learners.
* Do not mislead users about the level and extent of attainment
* Do not compromise the integrity or credibility of the qualification, for the learner concerned, or other learners.
* Are clearly tracked for audit, with supporting documentation where appropriate.

**Conditions for eligibility**

Learners, who are fully aware of the requirements for assessments and have been affected at or near the time of assessment by circumstances beyond their control, will be eligible for Special Considerations post testing.

Circumstances may include:

* Temporary illness or indisposition at the time of assessment, for example, severe asthma attack, severe migraine or broken limb.
* Emotional distress, for example, recent bereavement of close family member or severe domestic crisis at time of assessment.
* Severe disturbance during the assessment, for example, fire or accidental event.

Learners should not apply for Special Consideration for minor illness or minor disturbance.

Learners should not be entered for the assessment if they are not in a fit state to take the assessment or if they cannot meet the minimum requirements for assessment.

**Applying for Special considerations**

The centre should apply the criteria for Special Consideration and make any appropriate arrangements, including informing Titan Development Centre and the Awarding Organisation at the first opportunity.

The centre should complete a ‘Request for Special Consideration’ form for each learner requesting special consideration. This should specify the circumstances and the arrangements made to support the learner (for example, extra time). The form should be returned with the learner’s work and copies of any original supporting evidence/certification to Titan Development Centre and the Awarding Organisation, within seven days of the end of the assessment period. Centres should retain a copy of each form and the original documentation for three years.

# Conflict Of Interest Policy

A conflict of interest is an activity in which an individual or the centre has competing interests or loyalties. This may lead to an individual or individuals acting in a way contrary to the interest of the centre, awarding organisation and integrity of the qualification.

A conflict of interest may arise in a variety of different situations associated with the delivery, assessment and examination of qualifications. The following list is not exhaustive but provides examples of common potential conflicts:

* Where an individual has personal interests that conflict with their professional association with Titan Development Centre;
* An assessment and internal quality assurance activity on a single course is undertaken by the same person;
* Where an individual is internally marking assessments of a learner who is a friend or relative;
* Where a tutor invigilates examinations for a course of study that they have taught.

In implementing the approach for identifying conflicts of interest, everyone at the Centre is required to abide by the following principles:

* All must commit to identifying conflicts of interest and in doing so, raise any possible conflicts of interest with the Head of Centre;
* All must be proactive in the identification and management of conflicts of interest that may affect learners, the Centre or the Awarding Organisation;
* All must be open about the nature of any conflicts of interest and not try to hide or present them in a better light – managing conflicts of interest is about preventing issues from occurring that may impact on learners, the Centre or the Awarding Organisation;
* Strive to identify and deal with conflicts of interest sooner rather than later;
* Controls to manage the effect of any potential conflict of interest must be proportionate to the risks associated with the identified conflict.

Where a declaration of an actual or potential conflict of interest is identified, then the process for managing the conflict will follow these steps:

1. Head of Centre assesses the impact of the conflict or potential conflict of interest;
2. The conflict is either removed of managed;
3. Where it requires to be managed, the Head of centre will liaise with the relevant programme manager to discuss the necessary actions/controls to manage the conflict, mitigate any impact on the organisation and ultimately to ensure that the learners are not adversely affected;
4. Conflicts of interest will be monitored and reported to the Awarding Organisation where applicable.

The Centre will maintain a record of any declared conflicts of interest or potential/perceived conflicts of interest, recording them in a Conflicts of Interest Register that includes the nature of the conflict, potential adverse effect and the mitigating actions.

If a conflict of interest occurs that has not been disclosed then the Centre will refer to the relevant policy for Malpractice and Maladministration, Appeals or Staff Disciplinary.

# Examination Paper Destruction Policy

The Centre acknowledges that Highfield do not require that examination papers be returned to themselves following the completion of exams for licence linked units in the security sector.

With this in mind, Titan Development Centre will destroy all used question papers on completion of the individual exams by shredding. A register will be kept detailing the Examination Paper Code, Paper security Code, date of examination, date of destruction and signature of the individual that destroyed the papers. Each of these entries will then be confirmed and signed off by the Head of Centre.

This policy and document will be kept securely in the Highfield Training Records folder and will be available for scrutiny by Highfield on request.

1. Where they exist, see individual qualification guide. [↑](#footnote-ref-1)