



Safety Training Awards

Guidance for Setting Policies and Procedures for Learners

v18.3

Contents

Introduction.....	3
Conflict of Interest Policy	4
Complaints Policy	5
Appeals Policy	6
Equality and Accessibility Policy	7
Safeguarding Policy.....	8
Malpractice and Maladministration Policy	9

Introduction

Safety Training Awards is a government regulated awarding organisation and, as such, must comply with a wide range of conditions set out by the qualifications regulators. These conditions ensure that rigour and consistency in the awarding of qualifications are maintained. Our assessment procedures comply with best practice in the assessment industry.

This guidance document aims to provide approved training centres with all the information required to successfully develop and devise a set of key policies and procedures to deliver Safety Training Awards qualifications. The guidance should be read in conjunction with the Centre Agreement and relevant qualification specifications.

Please note that this document is provided to support you with setting your own policies and procedures to remain compliant with our **Approved Training Centre Agreement**. Under Condition C2 of Ofqual's Conditions of Recognition¹, we are obliged to advise our Centres on the key policies and protocols that are required to operate as an effective organisation.

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¹ Ofqual's General Conditions of Recognition (June 2016), can be accessed via

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/529394/general-conditions-of-recognition-june-2016.pdf.

Conflict of Interest Policy

To ensure the integrity of our qualifications and assessments, it is important that Approved Training Centres show that they are managing potential conflicts of interest within their businesses.

It is not possible to provide a definitive list of examples of conflicts of interest that could compromise the integrity of Safety Training Awards assessments and qualifications. However, the following situations could lead to perceived or actual conflicts of interest:

- Personal relationships with family members or friends linked to Safety Training Awards and/or centre personnel and/or learners that could influence decision making and qualification outcomes
- Business or commercial interests linked to Safety Training Awards and/or a centre that may affect professional judgement
- Mutually beneficial arrangements with centre and Safety Training Awards personnel which may compromise an individual's ability to make reliable and professional judgements
- Where favourable arrangements have been negotiated, for example supplying information to certain individuals and/or groups who are preparing for or carrying out an assessment
- A person connected with Safety Training Awards or a centre who are engaging in some capacity or have a material financial interest in a business or enterprise that compete with Safety Training Awards
- A centre has an interest in any activity which has the potential to lead it to act contrary to its interests in the development, delivery and award of qualifications in accordance with the conditions of the centre
- A situation that may create the appearance of a conflict or present a conflict of interest in connection with a person who has influence over the activities or finances of Safety Training Awards.

The existence of such interests, as those above does not necessarily imply conflict, but is likely to give an appearance of conflict and as such should be declared to Safety Training Awards.

Wherever possible all conflicts of interest must be removed by the Approved Training Centre. Where this is not possible then this should be managed appropriately to minimise the risk to learner performance.

Safety Training Awards recommends that the Centre Conflict of Interest Policy should clearly set out:

- i. The **purpose** of the policy, which should include the commitment to protect the integrity of the Approved Training Centre and by proxy the assessment decisions. The purpose should also state the need to protect centre staff by minimising the possible conflicts of interest.
- ii. The **scope** of the policy, which should clearly indicate who the policy applies to i.e. centre staff, tutors, IQAs and so on.
- iii. The **definition** of conflict of interest.

The policy should address a wide variety of circumstances that may lead to a conflict of interest along with reasonable steps to prevent such conflicts from having an adverse effect on learner performance.

As an Approved Training Centre, you should set out clear guidance on the key principles of how you will manage the potential conflicts and who will be responsible for monitoring key risks.

² List is not exhaustive.

Complaints Policy

All Approved Training Centres must have a robust Complaints Policy in place for learners. Approved Training Centres should aim to provide a high-quality service to its learners, but if a learner or a customer feels they have encountered a level of service that is below expectations then a clear-cut complaints procedure should be in place to investigate such matters.

Approved Training Centres should set out the following principles when developing their Complaints Policy:

- i. A policy review arrangement, which should encompass an annual review procedure as part of the centre self-evaluation arrangements to improve the complaints handling process.
- ii. Clear guidance on how learners and customers can complain, which should include informal and formal routes.
- iii. What details are required from learners and customers including any evidence to support their complaint.
- iv. A confidentiality and whistle-blowing clause that is in line with the relevant whistle-blowing legislation and guidance.
- v. A clear deadline for acknowledging the receipt of complaints and the length of time it can take to investigate the matter.
- vi. The process for upholding complaints and potential remedies.
- vii. If the outcome is unsatisfactory for the learner or customer, what they can do in relation to escalating the matter to a senior member of staff.

The Complaints Policy must clearly indicate who the complainant can contact to submit their complaint, and how they should submit their issue either via post or email.

It is important to note that the Complaints Policy must not:

- a) Handle service-level enquiries which is covered by the centre **Customer Service Policy**, or
- b) Appeals in relation to learner outcomes, which is covered by the **Appeals Policy**, or
- c) Any complaint about possible malpractice or maladministration, which is covered by the **Malpractice and Maladministration Policy**.

For further guidance on how to write an effective Complaints Policy, please contact Safety Training Awards' Responsible Officer.

Appeals Policy

All Approved Training Centres must have a robust Appeals Policy in place for learners. Approved Training Centres should aim to provide a high-quality service to its learners, but where there are potential learner judgements an Appeals Policy needs to be implemented.

Approved Training Centres must have internal appeal arrangements which learners can access if they wish to appeal against a decision taken by the centre. The policy should explain that learners are only able to appeal internal assessment decisions with the centre, although it is possible with Safety Training Awards agreement, that the External Quality Assurer could be the final point of arbitration.

The Appeals Policy will need to be reviewed annually.

It is important that centres state in their policy that any appeals against assessment results can only be made to the organisation that took the decision. Where an external assessment is used, a learner can appeal to Safety Training Awards but only if the approved centre believes there is a reasonable basis for an appeal. In such cases, the approved centre should take the appeal forward on behalf of the learner.

Approved Training Centres must have a clear process for dealing with an appeal, which must include an informal review of the appeal and a formal review of the appeal. There should be a set timeline for investigating and responding to appeals.

For further guidance on how to write an effective Appeals Policy, please contact Safety Training Awards' Responsible Officer.

Equality and Accessibility Policy

All Approved Training Centres must have an Equality and Accessibility Policy for its learners that is current and in line with the equalities legislation. All centres are required to deliver our qualifications through a fair and accessible process, which does not include any unnecessary barriers to entry.

The policy should include the commitment to train all tutors and centre staff on equality and accessibility issues. Those involved in delivering our qualifications must do this in accordance with the equalities law, enabling learners equal access to the teaching process. Centre internal assessment must similarly be undertaken without discrimination.

The policy must make clear that where complaints relating to issues of inequality cannot be resolved by the centre, learners must be made aware of their right to appeal through Safety Training Awards' Appeals Policy.

The centre should also collect information on diversity, requests for reasonable adjustments or special consideration and access arrangements.

For further guidance on how to write an effective Equality and Accessibility Policy, please contact Safety Training Awards' Responsible Officer.

Safeguarding Policy

All Approved Training Centres must recognise their responsibility in identifying and responding to concerns regarding the safeguarding and protection of children and young people, and vulnerable adults.

Your Safeguarding Policy must be written in line with statutory guidance including:

- i. *Keeping Children Safe in Education (2015)*³
- ii. *Working Together to Safeguard Children (2018)*⁴
- iii. *Prevent Strategy (2011)*⁵

There should be three main elements to your policy:

- i. Prevention through centre support offered to all learners and the creation and maintenance of an organisational-level ethos.
- ii. Protection by following agreed procedures, ensuring staff are subjected to background checks prior to recruitment and they are trained and supported to respond appropriately and sensitively to concerns.
- iii. Support for learners and centre staff who may have been abused.

You will need to set out your key aim, which can include:

‘Creating an environment that is safe and secure for learners to disclose their issues to Centre staff.’

To fulfil your aim, your policy needs to clearly indicate how you will meet the overall aim to protect learners, this may include:

- i. All staff and volunteers receiving training in safeguarding as part of their mandatory induction.
- ii. Regular training for staff on identifying safeguarding issues.
- iii. Embedding a robust recruitment policy that enables critical checks in line with safer recruitment (DBS, barred lists, prohibition order checks and references).

Your policy must indicate a Designated Safeguarding Officer (DSO) who will be the key point of call for all reported allegations. The DSO will be responsible for investigating the raised concern through a set procedure.

The DSO will also need to refer cases of suspected abuse or allegations to the local Social Services Department in accordance with LSCB procedures, and work with other agencies in line with *Working Together to Safeguard Children (2018)*.

The Approved Training Centres will need to develop a procedure and process to handle such allegations sensitively, which may include having an investigation panel chaired by the DSO.

For further guidance on how to write an effective Safeguarding Policy, please contact Safety Training Awards’ Responsible Officer.

³ ‘Keeping Children Safe in Education’ (2015) can be accessed via https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf

⁴ ‘Working Together to Safeguard Children’ (2018) can be accessed via https://consult.education.gov.uk/child-protection-safeguarding-and-family-law/working-together-to-safeguard-children-revisions-t/supporting_documents/Working%20Together%20to%20Safeguard%20Children.pdf

⁵ ‘Prevent Strategy’ (2011) can be accessed via https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf

Malpractice and Maladministration Policy

This policy must cover Malpractice and Maladministration by Approved Training Centres, learners or others involved in the delivery and award of Safety Training Awards qualifications.

Irrespective of the underlying cause or the people involved, all allegations of malpractice or maladministration in relation to qualifications and assessment need to be investigated in order to protect the integrity of the qualifications and to be fair to all centres and learners.

When developing a Malpractice and Maladministration Policy you should clearly define the concept of malpractice and maladministration. For example, malpractice can be defined as ***‘any attempt to gain unfair advantage in a qualification for oneself or for another’***.

When developing your own policy, you may wish to use the following examples of malpractice:

- i. a learner copying another learner’s work.
- ii. a learner bringing into an examination room aids (e.g. notes, mobile phone) that could be used to help answer the examination questions.
- iii. a learner using others’ ideas and words in an assignment without clearly acknowledging the source of the information (plagiarism).
- iv. a tutor giving a learner unfair assistance with an assessment.
- v. an invigilator revealing the questions in an examination to learners before the time of the examination.

Your policy must then go on to define maladministration and your understanding of what constitutes such practices. This could be:

‘Any activity or practice which results in non-compliance with Safety Training Awards regulations and requirements constitutes maladministration’.

Examples of maladministration include:

- i. an Approved Training Centre failing to return all examination materials after an examination.
- ii. an Approved Training Centre failing to issue learners with appropriate notices and warnings in an examination.
- iii. an Approved Training Centre not ensuring the assessment venue conforms to requirements.
- iv. errors or omissions in information supplied to Safety Training Awards.

A typical Malpractice and Maladministration Policy should state how learners, centres, invigilators, tutors and assessors can report suspicious malpractice or maladministration practices.

All Approved Training Centres are required to report any suspicious activities to the Head of Compliance, Assurance and Assessment – who is also the designated Responsible Officer. This needs to be clearly specified in your policy.

You may also wish to refer to Safety Training Awards Malpractice and Maladministration Policy to set out next steps, after the alleged incident is reported to the awarding organisation.

For further guidance on how to write an effective Malpractice and Maladministration Policy, please contact Safety Training Awards’ Responsible Officer.

The guidance on setting key internal policies and procedures to operate as an effective approved training centre is not absolute. You may wish to provide us with critical feedback to improve this handbook for your benefit.