

EPTI IQA Document

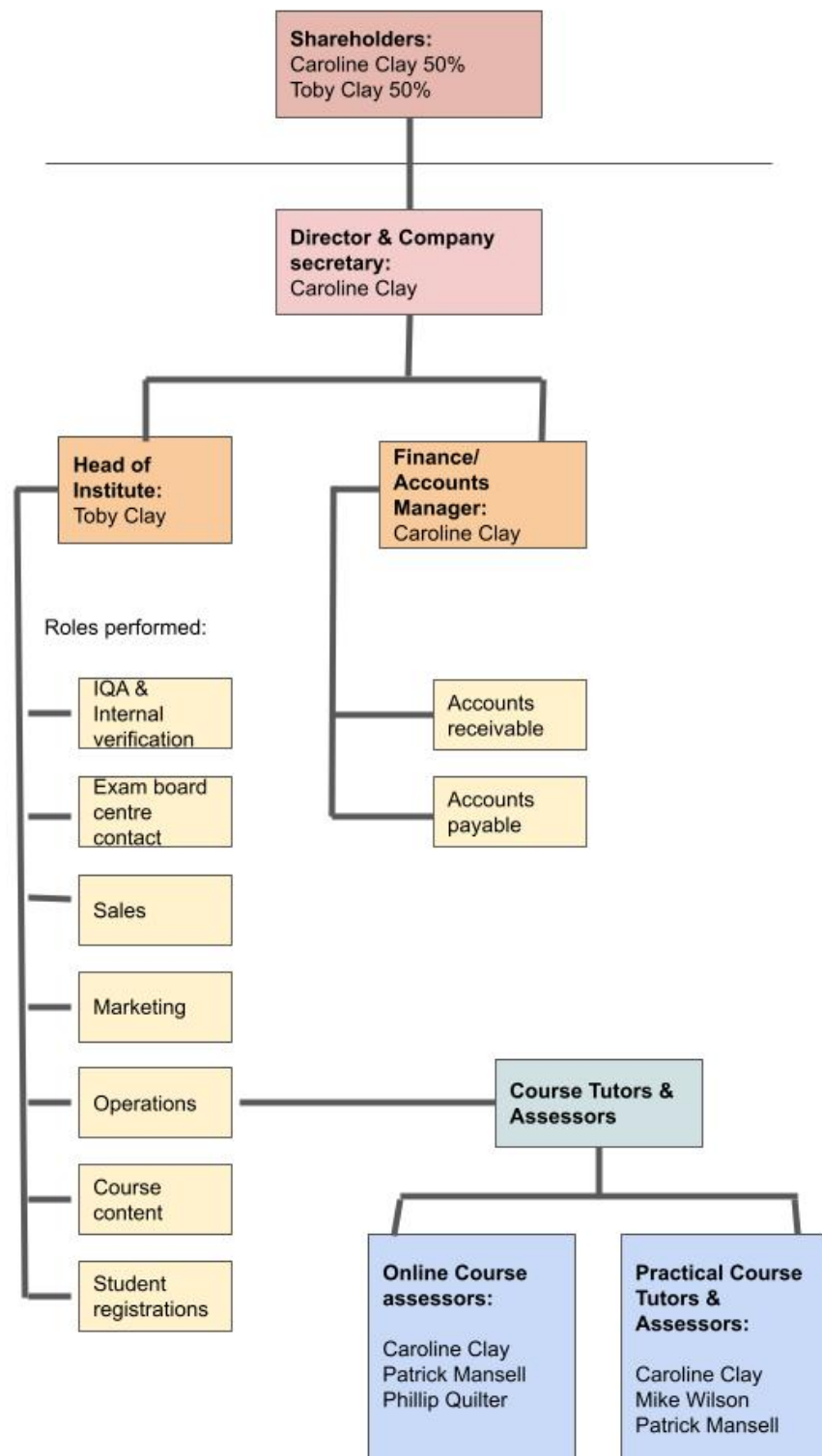
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i. Organisation of the Institution

i.i EPTI Organigram



i.ii Description of roles

The institution is owned and largely operated by the owners, Caroline & Toby Clay who have equal 50% shareholding of the company. They are assisted by a dedicated team of self-employed freelance tutors/assessors who have been working with EPTI for a number of years.

Toby Clay is head of the institution and his roles within the organisation are as follows:

- **Internal Quality Assurance:**
 - To carry out and evaluate internal assessment and quality assurance systems
 - To support assessors/tutors
 - Monitor the quality of assessor/tutor performance
 - Meet external quality assurance requirements (Exam board, CIMSPA)
- **Exam board centre contact:**
 - Point of contact to receive communications from the exam board
 - Registration and certification of students with the exam board
- **Sales:**
 - Point of contact for prospective students to contact interested in applying for and enrolling onto fitness courses
- **Marketing:**
 - Marketing of upcoming courses through advertising and social media
- **Operations:**
 - Organisation and planning of practical courses
 - Management of tutors and assessors for both the online and practical phases of the course (ties in with IQA role)
- **Course Content:**

- Responsibility to ensure course content and assessment is relevant and up to date and meets exam board syllabus and assessment criteria
- Creation of learning resources - student handbook, manuals, video lesson creation
- **Student Registration:**
 - Enrolment of students onto the practical course dates of their choice
 - Course induction
 - Liaison and point of contact for students during online and practical parts of the course

Caroline Clay is finance and accounts manager, her role is document income and expenditure and submit accurate accounts for external book keeping.

- **Accounts Receivable:**
 - Income arising from course sales
- **Accounts Payable:**
 - Expenditure arising from operating costs

As previously mentioned, teaching and assessing is carried out by a dedicated team that have been working exclusively with EPTI on a self-employed, freelance basis for a number of years.

Our fitness courses are delivered by blended learning. Students complete online study and coursework assignments during an online theory course, which is then followed by a practical teaching and assessment face to face course.

Assessment activity is carried out during both the online and practical phases of our fitness courses.

- **Online Course Assessor:**
 - To remotely assess via email, student assignments and case studies against the agreed assessment criteria and if applicable, provide guidance and feedback to help the learner meet assessment criteria

- **Practical Course Tutor:**

- To deliver the live practical course content to the learners in the gym environment and classroom
- To ensure learners show an understanding of the learning outcomes and are able to demonstrate practical competence of content being taught

- **Practical Course Assessor:**

- To assess practical assessments against the agreed assessment criteria and if applicable, provide guidance and feedback to help the learner develop the necessary skills to meet the assessment criteria
- To invigilate theory exams during the practical course

ii. Mission Statement:

Our Vision:

Leading the way in health, wellness and physical activity education to champion the highest level of industry standards.

Our Mission:

The European Personal Training Institute (EPTI) is committed to promote fairness and equality, inclusive learning for learners of all backgrounds. We aim to provide students with an equal chance of success by following our learning resources and tuition.

EPTI aims to provide a professional, knowledgeable and enjoyable training experience for our students.

We wish to enhance the careers of those already working in their desired roles, and to equip new learners with the knowledge and skills to embrace a new and successful career within the fitness industry.

Statement on Academic Integrity:

Our common objective is to make sure that we teach and learn with commitment, consistency, honesty and fidelity.

All EPTI members of staff have the obligation to serve as models of personal and professional integrity, as well as models for creating, expressing and transferring knowledge.

Students are responsible for conducting their learning in a similarly honest and committed fashion-by avoiding plagiarism, cheating or taking credit for work not their own-and thus contributing to a learning environment which expects and supports academic integrity.

Our Values:

- Creative
- Efficient
- Professional
- Supportive
- Inclusive

1. Internal Verification Activity

EPTI consists of one teaching team. The institute does not include any local franchises or representatives operating on their behalf.

All tutors/assessors must provide a copy of their CV and evidence of their qualifications and Certificates.

The EPTI Skills Matrix is a document created by the Internal Verifier and details all teaching staffs' skills and competencies and provides a current and evolving traffic-light risk stratification (red, amber ,green).

According to the level of risk and experience, all teaching staff are provided with ongoing support by the Head of Institution, in their role as the Internal Verifier. This document is shared upon request with the exam board during their yearly external assurance activity.

IQA activity for all teaching staff is determined by this risk stratification.

1.1 Criteria for Red Assessors:

- Inexperienced assessors new to assessing
- An experienced assessor but new to the qualification
- Any assessor new to EPTI, regardless of previous experience
- Assessors who have previously made poor assessment decisions and who are considered at higher risk.

Given that Red Assessors have not made consistent assessment decisions over time for EPTI, they will only be assigned a maximum load case of 10 students.

Portfolio sampling: 80% of their portfolio assessments to ensure that correct and consistent assessments are being made. All assessment methods will be sampled within the Learners' portfolios, to include observations, student worksheets and case studies, and summative assessments.

Learner interviews will also be conducted onsite during the practical course.

Lesson & Assessment Observations: Lesson deliveries will be observed to ensure staff are competent as a tutor. Assessment decisions and giving feedback to students will be observed to ensure that centre assessment procedures are being adhered to.

Standardisation: Standardisation activity will be e-mailed to assessors ahead so that their feedback can be evaluated. Standardisation meeting will be provided.

Examples of standardisation activity include double marking of case studies (by assessor and IV) which are then compared, request of assessor feedback from exemplar case studies, request of assessor feedback from videoed summative assessments to compare with exemplar assessment to evaluate assessment competence and to ensure consistency of assessment practice from the assessor and between all assessors.

1.2 Criteria for Amber Assessors:

Subject to a 100% positive sample being carried out, Red Assessors will be promoted by the internal verifier to an Amber Assessor. In the event of the assessor requiring more or continued high levels of support, they will remain graded as a Red Assessor and the IQA strategy will remain the same for them until such time as their assessment practice becomes consistent with the IQA.

Amber Assessors will be given a maximum case load of 16 students per practical course, given that their experience places them at a medium risk.

Portfolio sampling: 60% of their portfolio assessments to reflect the lower risk of inconsistent assessment practice. All assessment methods will be sampled within the Learners' portfolios, to include observations, student worksheets and case studies, and summative assessments.

Learner interviews will also be conducted onsite during the practical course.

Lesson & Assessment Observations: Lesson deliveries will be observed to ensure staff are competent as a tutor. Assessment decisions and giving feedback to students will be observed to ensure that centre assessment procedures are being adhered to.

Standardisation: Standardisation activity will be e-mailed to assessors ahead so that their feedback can be evaluated. Standardisation meeting will be provided.

1.3. Criteria for Green Assessors:

The maximum load case will be increased to 20 students to reflect their greater competency as an assessor.

If the assessor has been found by the Internal Verifier to have made consistent assessment decisions over the previous two courses, they will be promoted to be graded as a Green Assessor. If there have been a few inconsistencies with assessment practice, then the assessor will remain as graded Amber, and if consistently poor assessment decisions have been evident, the assessor will remain/be relegated from Amber to Red Assessor.

Portfolio sampling: As Green graded assessor, 33-40% of portfolio assessments, to reflect the low risk of inconsistent assessment practice. All assessment methods will be sampled across the Learner Achievement portfolios, to include observations, theory exam and student worksheets. Learner interviews will also be conducted onsite during the practical course.

All assessment methods will be sampled within the Learners' portfolios, to include observations, student worksheets and case studies, and summative assessments.

Learner interviews will also be conducted onsite during the practical course.

Lesson & Assessment Observations: Lesson deliveries will be observed to ensure staff are competent as a tutor. Assessment decisions and giving feedback to students will be observed to ensure that centre assessment procedures are being adhered to.

Standardisation: Standardisation activity will be e-mailed to assessors ahead so that their feedback can be evaluated. Standardisation meeting will be provided.

2. Institutional Probity

2.1 Head of Institution selection criteria:

The current Head of Institution, Toby Clay has over 20 years experience as a personal trainer. Should he be unable or unwilling to fill this role, a call for applications will be issued. Criteria required for the headship position are envisaged to be:

Practical Experience:

Minimum 5 years work experience as a Personal Trainer

Minimum 5 years work experience as a teacher, assessor and Internal verifier in the delivering of CIMSPA recognised Gym Instructor & Personal Trainer qualifications

Some previous experience working as a centre contact with a UK exam board

While not necessary, candidates with managerial experience within an educational institution would be given priority as these would be able to manage both the technical and educational elements of the firm.

Eligible applicants will be interviewed by the Company Director, using a competency-based interview.

Required Qualifications:

MQF Level 4 Certificate in Personal Training (CIMSPA recognised qualification)

MQF Level 5 Certificate in Leading the Internal Quality Assurance of Assessment (or equivalent)

MQF Level 4 Award in Assessing Vocationally Related Achievement (or equivalent)

MQF Level 4 Award in Preparing to Teach in the Lifelong Learning Sector (or equivalent)

2.2 Finance:

The Malta entity has not yet begun trading. Given that much of the education can be delivered online, EPTI was able to continue educating students during the recent Covid lockdowns.

EPTI has been trading in Spain since 2014 and has posted a profit year on year. EPTI therefore has access to adequate financial reserves to support its operations even in case of further unpredictable adverse financial events. This ensures that under such circumstances, courses could continue to be supported at a loss if necessary until the current cohort/s of students complete their course. This eliminates the risk to students of having their course/s abruptly terminated

3. Design and approval of programmes

Both the Certificate in Planning & Delivering Gym Based Exercise and Diploma Practitioner in Personal Training have been designed according to the qualification and assessment criteria provided by the Awarding Organisation, Focus Awards.

In order for a student to become certified Diploma Practitioner in Personal Training qualification, they must have first successfully completed the Certificate in Planning & Delivering Gym Based Exercise qualification.

All course resources, teaching methods and timetable have been approved for use by the Awarding Organisation.

The current courses were written and approved in 2020 to meet the new and updated professional qualification standards introduced in the UK by the Chartered Institute for the Management of Sport and Physical Activity (CIMSPA).

The practical part of the course is delivered by EPTI having been rigorously externally verified by the Awarding Organisation and mapped against the qualification and assessment criteria. The exam board themselves are externally quality assured by CIMSPA.

Student feedback is obtained following every practical course to ensure that the course meets their requirements and expectations. Student feedback will be evaluated and used to guide development and amendments where deemed appropriate to improve the learning experience.

New courses may be considered if repeated requests for a specific subject area are received, new professional standards are produced by CIMSPA, or assessment criteria is adapted by the Awarding Organisation.

When developing new courses, a bottom-up approach is taken, with a qualification design tutor team set up (composition dependent upon the subject of the proposed course, with all members required to have practical experience in the subject) and tasked with overseeing the design of the course. Feedback from potential employers, tutors, assessors and students is also sought to ensure that the proposed course meets the requirements and expectations of these groups, as well as any other stakeholders who may be identified.

During the course design, consultation will be undertaken with the Awarding Organisation external quality assurance team. In addition, further research and consultation with recognised external experts in the field is anticipated.

Feedback and information obtained during this process will be used to guide development of the proposed course and to prepare a draft training programme. This is reviewed internally, with amendments made where necessary until all internal parties are satisfied with the draft.

This draft course will then be submitted to Focus Awards for accreditation.

4. Teaching Staff

EPTI is an equal opportunity business taking into account the diversity within our workforce, customers and learners.

We believe that everyone should be treated equally, regardless of their religion, beliefs, age, gender, race, disability or sexual orientation.

The Equality & Diversity Policy requires commitment from everyone within the Company.

This policy and the legislation it represents will be taken into account during the design and development of all our manuals and literature.

Our Responsibilities

As an employer we ensure that we have a workplace where staff feels valued, respected and included. Upon commencement of their employment, staff will be informed of the existence of this Policy and the company's expectations of them under its terms.

Harassment, exclusion and bullying will not be tolerated on any level. All staff should feel comfortable at work and always be treated with dignity and respect.

We will ensure that fair standards of employment practice and proper records of employment decisions are maintained. We will deliver training on new and revised legislation to all our staff.

We will treat all our business partners, customers and learners with respect, courtesy and consideration at all times.

Employees' Responsibilities

All of our employees must adhere to and comply with this Policy and the spirit in which it is written.

Employees must treat all colleagues and customers with courtesy, respect and consideration at all times.

If employees believe that any form of discrimination is taking place within the workplace, we expect them to report this to senior management immediately.

4. 1 Teaching staff selection criteria:

Practical Experience:

Minimum 2 years work experience as a Personal Trainer (Preferable)

Required Qualifications:

MQF Level 4 Certificate in Personal Training (CIMSPA recognised qualification)

To hold or be working towards:

MQF Level 4 Award in Assessing Vocationally Related Achievement (or equivalent)

MQF Level 4 Award in Preparing to Teach in the Lifelong Learning Sector (or equivalent)

Preferable:

MQF Level 6 Degree in Sports Science (or equivalent)

Skills:

Good communicator in English

Able to demonstrate good knowledge in both theoretical and practical application of anatomy & physiology, fitness and exercise prescription and training.

Professional Development of Staff:

It is understood that all trainers are to be kept abreast of both the latest advancements in the subject area as well as be kept informed of any new learning techniques that could be implemented in the delivery of the course. This is ensured through:

- Quality review checks that are conducted during the delivery of accredited programmes
- The sharing of relevant articles/research material with tutors/assessors
- Regular feedback sessions and performance discussions with tutors/assessors
- Course evaluation feedback from students

4.2 Recruitment:

Wherever possible all vacancy advertisements will include an appropriate short statement on equal opportunity and diversity, and steps will be taken to ensure that knowledge of vacancies reaches all areas of the community. We will also endeavour to ensure that all vacancies

are advertised both internally and externally simultaneously.

The selection criteria (job description and employee specification) for all roles will be kept under constant review to ensure that they are essential for the effective performance of the job. Remuneration will be set for the advertised position before applicants are seen and selected.

Wherever possible, more than one person must be involved in the recruitment and selection process. In addition, the reasons for the selection and rejection of applicants for vacancies must be recorded.

Core principles:

- EPTI has a principle of open competition in its approach to recruitment
- EPTI will seek to recruit the best candidate for the job based on merit. The recruitment and selection process should ensure the identification of the person best suited to the job and to our institution
- EPTI wishes to provide equal employment opportunity by encouraging the recruitment of staff from all backgrounds
- EPTI will ensure that the recruitment and selection of staff is conducted in a professional, timely and responsive manner and in compliance with current employment legislation

5. Public Information

5.1 Website:

All specific course information is provided in detail for prospective students on the respective course pages of our website.

<https://www.europeanpti.com/>

5.2 email contact:

Prospective students are signposted from the website to complete an enquiry contact form, where they are then emailed with more specific course information and <https://www.europeanpti.com/contact>

5.3 course application:

Prospective students may then submit an application form to join a course having read and understood EPTI course policies & procedures. Their suitability is then reviewed (level of English, experience using gym-based training equipment), and if successful students are invited to enrol onto the respective course.

<https://www.europeanpti.com/apply-now/application-form>

5.4 Keeping the information up-to-date:

The Head of Institution is responsible for ensuring all public information is up to date.

6. Student Learning, Teaching & Assessment, Learning Resources & Student Support

Learners can expect to be treated with respect, courtesy and consideration at all times by our staff and we expect them to treat our staff in the same way. They will not be discriminated against or treated less favourably in any way on the grounds of religion, beliefs, age, gender, race, disability, or sexual orientation.

EPTI currently contracts on a freelance basis a number of experienced tutor/assessors that have been working with us previously on courses run at other locations that are not covered by this application.

6.1 Teaching Staff Responsibilities:

Mike Wilson online course tutor and assessor.

Malta practical teaching pool: Patrick Mansell, Phillip Quilter & Caroline Clay.

EPTI staff are responsible for ensuring that:

- Any personal data that they hold is kept securely;
- Personal information is not disclosed orally, in writing, via Web pages or by any other means, accidentally or otherwise, to any unauthorised third party.

Online course:

Support and guidance of students through online theory study and coursework assignments

Assessment of student coursework prior to the practical course

Practical course:

Delivery to students of practical skills of the course

Recapping and review of theory learned during online self-study

Assessment of formative and summative practical assessments

Invigilation and assessment of theory exams

6.2 Qualification delivery:

All students are given the opportunity to declare special learning requirements, special consideration or reasonable adjustments during the enrolment process.

Online course:

- Our online learning platform has been approved for use by the Awarding Organisation and provides a diverse student online learning experience. The online learning incorporates student interaction and understanding in order to progress through the online content.
- Lessons are delivered via tutor led video lessons, detailed diagrams and student learning games, quizzes and formative knowledge reviews.
- The online e-learning is supported by detailed course manuals for each qualification.
- Additional course information and course guidance provided in the EPTI student handbook.

Practical course:

- Tutor led Q&A reviewing online course theory content
- Tutor led practical skills sessions in the gym and studio, which allow for the opportunity for learners to master the practical skills and apply the theory previously learned online.
- Student self-reflection and tutor feedback sessions to allow learners to receive constructive development points to improve their own practical techniques and skills

6.3 Course resources:**Online course:**

The responsibility of the e-learning platform and course manuals is of the Head of Institution.

<https://www.europeanpti.com/login>

Online learning support:

- In the first instance the student's personal tutor is responsible for technical support.
- If they cannot find a solution this will be referred to Head of Institution
- In case of failure of the online e-learning platform, learning can be continued through the PDF manuals which are available in the EPTI student area to download by students
- All student learning resources and documents are additionally backed up through an online Google Drive

6.4 Student support:**Online course:**

Students are provided with an extensive support system while undergoing the self-study part of the course. The following modes are available for students to contact their course tutors:

- Email
- Telephone
- Skype
- Student Facebook group
- Whatsapp messenger

Practical course:

- 1:1 Tutorials
- Student Facebook group

6.5 Policies:

All policies and procedures are outlined in the Student handbook. During the enrolment process, all learners are required to provide suitable photo ID such as a Malta ID card or passport.

Malpractice/Maladministration Procedure

EPTI will investigate instances of alleged or suspected malpractice or maladministration and will take appropriate action where required to maintain the integrity of units and qualifications. Malpractice is defined as any deliberate activity, neglect, default or other practice that compromises the integrity of the assessment process, and/or the validity of certificates. Maladministration is any activity, neglect, default or other practice that results in the centre not complying with the specified requirements for delivery of units and qualifications.

Should an alleged malpractice/maladministration arise on the part of the learners, centre staff, or others involved in providing an awarding bodies qualification, EPTI:

- Report immediately to the awarding body any suspected case of malpractice/maladministration arising after learners have been registered.
- Investigate and record full details of the nature of the suspected malpractice/maladministration issue, including personnel involved and any action taken.

Examples of learner misconduct could include:

- Non-compliance in observing the mandatory rules of conduct during an assessment

- Replication of another learner's work in either the practical, theoretical or portfolio aspect of assessment.

Misconduct procedure (learners)

Where an issue of misconduct occurs and is discovered or reported the following action will be taken:

- The Invigilator/Centre Contact is empowered to expel a learner from the assessment room
- The expelled learner's assessment paper will be securely retained and a report filed to the Centre Contact
- The report and assessment record will be available for submission to the awarding body and the regulatory authority (Ofqual or SQA) upon request

If any of the rules of external assessment are deemed to have been broken by a learner, invigilator or other person involved in the assessment process, then EPTI and the awarding body may declare the assessment void.

Examples of centre malpractice/maladministration could include:

- Failure of EPTI to report any suspected malpractice reported to the awarding body from other sources
- Failure on behalf of EPTI to comply with awarding body guidance relating to reasonable assessment adjustments
- Claims for certification being submitted by EPTI for units and/or qualifications that have not been approved for delivery by the awarding body
- Delivery and assessment of units and/or qualifications that have not been approved by the awarding body
- Claims for certification being submitted by EPTI for learners that have not been registered with the awarding body
- Unauthorised replication of (or other tampering with) externally assessed theory papers and/ or e-assessment

Malpractice/maladministration procedure (centres)

Where an issue of malpractice or maladministration occurs, is discovered or reported EPTI will:

- Report the issue to the awarding body Lead Quality Assurer who will investigate the suspected case of malpractice/maladministration

- Investigate the facts relating to allegation/complaints in order to determine whether any irregularities have occurred

Conclusions will be based on established evidence. A course of proposed actions will be identified, agreed, implemented and monitored in association with the awarding body. All relevant evidence will be considered without bias.

6.51 Plagiarism:

Plagiarism means to steal and pass off the ideas or words of another as one's own without permission.

Cheating can include copying somebody else's work and passing it off as your own. This can include allowing somebody to copy your work. Cheating can also mean somebody impersonating as someone else and doing the work for them.

All cases of suspected cheating, plagiarism or copying will be investigated and, if proven, awarding bodies may also impose their own sanctions and penalties, including disqualification.

6.52 Assessing assignments and exams:

All assessments (online coursework learner portfolios and practical course assessments) are rigorously internally verified against the EPTI IQA strategy guidelines and then sampled and submitted for the Awarding Organisation's external verification process.

Online course:

Coursework assignments are marked against the Awarding Organisation's specific qualification guidance documents which provide support for assessors.

Assessors are given with further support from the course internal verifier who provide regular standardisation activities to ensure consistent assessment for all learners.

The coursework process allows for feedback from the course assessors and students given the opportunity to amend their work and re-submit their work until such time that their portfolios meet the Awarding Organisation's assessment criteria.

Practical course:

Multiple choice theory exams are marked automatically by the Google Form that hosts the specific exam. Learners pass the assessment if 70% or more is achieved, and referred and required to undergo reassessment if they achieve less than 70%.

Practical formative and summative assessments are conducted using Awarding Organisation paperwork and assessment checklist. All staff are given robust training before performing this role. Continuous standardisation activities are provided by the course internal verifier.

6.53 Complaints procedures:

Appeals Procedures

All students are assessed against published material. Achievement of these criteria is decided by trained and qualified assessors AND/OR external assessment (such as coursework or exams).

It is recognised that, in exceptional circumstances a student may wish to appeal against recommendations or decisions relating to assessment.

This Appeals Policy and Procedure outlines the action which may be taken in such exceptional circumstances.

Appeals Policy

EPTI have procedures in place should a student wish to appeal against an assessment decision.

All students are assessed against the awarding bodies' criteria. Assessment decisions are made by appropriately qualified trainers/assessors for that particular qualification.

Areas for Appeal:

Learners can appeal against an assessment decision relating to the following:

- The mark for an individual item of coursework e.g. worksheets & case studies
- The final result of any element of assessment e.g. planning, teaching and/ or evaluation
- The external assessment (theory paper)
- The final overall internal/external assessment decision for a qualification

Grounds for Appeal

An appeal may be made if:

- The assessment was not conducted in accordance with EPTI/awarding body regulations

- Medical or other mitigating circumstances
- There was inappropriate or irregular behaviour on the part of the assessor

Appeals Procedure:

Stage 1

- The student should first discuss the reason with the appropriate person (Internal Quality Assurer/Assessor on the day)
- If this doesn't resolve the issue then the student should complete the student appeal form and submit it to the Internal Quality Assurer within 5 days of the assessment & include any supporting evidence (forms can be requested by emailing info@europeanpti.com, subject 'Appeals Form').
- The Internal Quality Assurer will investigate & respond within 7 days in writing

Stage 2

- If the learner feels that the outcome is unsatisfactory they should complete the relevant section of the Student Appeal Form and re-submit to the Internal Quality Assurer
- EPTI will then notify the External Quality Assurer.
- If the External Quality Assurer was not present or is unable to resolve the appeal issue, the learner will be directed to the third stage of the appeals process

Stage 3

- The learner should complete a written appeal directly to the Lead External Quality Assurer for the awarding body, who will investigate the matter thoroughly and respond in writing within 21 working days
- If the learner feels that the Lead External Quality Assurer has been unable to bring the matter to a satisfactory conclusion, the appeal may be referred directly to the Director of Awarding Body.

Stage 4

- The learner may be offered a formal appeals hearing. This will be conducted within 6 weeks and will be conducted by the appeals panel
- Provision of an appeals hearing will incur a nominal fee. The fee will be refunded if the appeal is upheld

Additional Notes

The learner has the right to video any aspect of their assessment using their own video recording equipment provided it does not interfere with the assessment process, other learners or the assessor's ability to carry out their role(s).

- It is the responsibility of the learner to arrange a video operator
- It is the responsibility of the learner to notify the centre where their assessment is taking place of any medical problem which may affect student performance adversely in the assessment process, so that a decision can be made for deferral, prior to the assessment date
- Theory papers that are externally assessed are marked electronically and sampled regularly

Appeals against referrals in the external theory result can result in the following action:

1. Investigation into the centre's invigilation procedures/delivery
2. Hand marking of the theory papers
3. Investigation into the content of the theory paper by Focus Awards Senior Qualifications Manager

Complaints Policy:

Our Responsibilities

EPTI is committed to providing a high quality service for our learners, clients and the community we serve.

We will deal with legitimate complaints in a fair, prompt and objective manner. Complaints will be dealt with without recrimination and learners will not be disadvantaged by raising a complaint.

We will be fair in the treatment of all those who complain irrespective of age, gender, ethnicity and disability. Complaints will be dealt with promptly and constructively. All complaints will be dealt with in confidence but shared with any person who may be the subject of a complaint. The outcomes of any complaint will be shared with the complainant and any staff involved. Complaints made which, on investigation, turn out to be malicious, may result in disciplinary action.

The Head of Institution will be responsible for the management of the Complaints Policy and all learners will be informed whom the Head of Centre is.

Scope of Complaints Procedure:

The Procedure deals with complaints arising from:

- Delivery (or lack of delivery) of services for education and training including teaching, course content, tutoring, assessment, feedback on progress and learner support during learning programmes
- Incorrect or misleading information about services provided by the Centre
- Delivery (or lack of delivery) of support services provided by the Centre including administration of fees, enrolment processes, health and safety, and learner resource services
- Unacceptable actions or behaviour by Centre staff and/or other learners in the Centre

How to complain:

Complaints must be made in writing to the Head of Institution.

Support can be made available for all those involved in a complaint including:

- Representation: parent, guardian, friend or supporter
- Help with completing the Written Complaint

Induction will provide further details regarding this process.

Informal resolution of complaints

Most complaints should be able to be resolved by discussion between the complainant and the appropriate member of staff. The initial complaint may be made orally or in writing and the member of staff receiving the complaint should make a response within 10 working days, orally or in writing. It is expected that staff are tactful and courteous in dealing with a complaint. If the complainant is dissatisfied with the response received, they should then be guided to using the formal procedure.

Formal procedure:

A formal complaint should be made in writing within 15 working days of an incident or action from which the complaint arises, or from the date when the complainant received an oral or written reply to an informal complaint (see above). In exceptional circumstances, a longer period will be considered. The complaint should be sent to the Head of Institution.

- If the complaint involves the Head of Institution, an alternative person will be appointed to manage the process. The complaint will be logged and its receipt will be acknowledged to the complainant within 5 working days.
- The Head of Institution will carry out an initial assessment of the complaint within 5 working days. In most cases, complaints will be referred to the appropriate staff for

investigation and report. More serious or unusual complaints will be investigated personally by the Head of Centre.

- An appropriate Centre manager will carry out an investigation of the complaint and may interview the complainant; the respondent; witnesses to the matter or events; and anyone they believe may have a role in establishing or disproving the complaint, as necessary. They will prepare a summary and report back to the Head of Centre within 10 working days of the initial assessment.
- The Head of Institution will record the outcome of the complaint and either arrange a meeting to deliver the outcome or notify all those involved in writing as appropriate. All outcomes will be confirmed in writing to all those involved.
- If the complaint involves a learner, they will be offered support at the meeting.
- All learners will be encouraged to bring a supporter to the interview. Vulnerable Adults must have the support of their care worker, or a person of their choice, who can act as their advocate and the Head of Institution must be informed.
- The formal complaint should be resolved within 25 working days of the receipt of the original formal complaint. If it appears that a decision will not be reached within the due period, those involved will be advised of the need for a longer period.
- The decision made will be final but this does not affect an individual's legal rights.

Review of the Complaints Policy and Practice:

Once a year the Centre's Senior Management Team will review the Complaints Policy and Practice to include:

- Number of complaints of each type
- Time taken to process complaints
- List of outstanding complaints
- Outcomes to complaints
- Results of appeals
- Analysis of complaints and outcomes by age, gender and ethnicity of complainant

If changes are required the Complaints Policy will be rewritten and all staff and learners will be informed.

A record of all complaints for 3 years will be available to the relevant authorities for audit purposes.

7. Student admission, progression, recognition and certification

7.1 Previous experiences/ qualifications:

During the enrolment process, learners are asked to provide any relevant experience qualification that might be used to as approved recognised learning against the qualification.

7.2 Enrolment form:

See online enrolment form: <https://forms.gle/ypeyiJ5cCpqQ36Np9>

7.3 Induction process:

Students are offered a 30 minute Skype call induction to orientate them with the course material and online e-learning platforms. Alternatively students may choose to do this themselves by watching the induction video provided in the student online learning area and following the steps provided in the student handbook.

7.4 Student Progression:

Student coursework progression is recorded by the specific assessor in their own course coursework tracking document. Each assessor's tracking documents can only be accessed by the themselves, the Internal Verifier and the Company Director.

Information from each of the assessor's documents is transferred to a Master coursework tracking document, accessible only by the Internal Verifier and Company Director.

All documents are stored in a password protected online Drive.

7.5 Student Information:

Student information is collected using Google Forms and stored securely in a password protected Google Drive. The information is not stored in Malta.

7.6 Completion of course:

Learners are presented with an EPTI attendance certificate and are also provided with the Awarding Organisation's own achievement certificates for each of the specific qualifications successfully completed.

8. Information Management

- All information about the learner is collected in the enrolment form (together with scan copy of passport)
- The enrolment procedure is carried out by Education Director, Toby Clay who is also responsible for the management of student data
- Records are not stored in Malta, they are stored securely on a password protected Google Drive

Data Protection Policy

EPTI needs to keep certain information about its learners in order to allow it to record learner achievements, effectively manage customer correspondence, monitor the effectiveness of its qualifications and comply with awarding body guidelines. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

To do this, EPTI must comply with the Data Protection Principles which are set out in the Data Protection Act 1998 (the 1998 Act).

In summary these state that personal data shall:

- be obtained and processed fairly and lawfully and shall not be processed unless certain conditions are met;
- be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose;
- be adequate, relevant and not excessive for that purpose;
- be accurate and kept up to date;
- not be kept for longer than is necessary for that purpose;
- be processed in accordance with the data subject's rights;
- be kept safe from unauthorised access, accidental loss or destruction;
- not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.

EPTI and all staff who process or use personal information must ensure that they follow these principles at all times.

EPTI will adhere to the Act through the following measures:

- fully observing conditions regarding the fair collection and use of information;
- meeting its legal obligations to specify the purposes for which information is used;

- collecting and processing appropriate information only to the extent that it is needed to fulfil our operational needs or to comply with any legal requirements;
- ensuring the quality of information used;
- ensuring that the information is held for no longer than is necessary
- ensuring that the rights of people about whom information is held can be fully exercised under the Act (i.e. the right to be informed that processing is being undertaken, to access one's personal information; to prevent processing in certain circumstances, and to correct, rectify, block or erase information that is regarded as wrong information);
- taking appropriate technical and organisational security measures to safeguard personal information;
- ensuring that personal information is not transferred abroad without suitable safeguards.

EPTI staff are responsible for ensuring that:

- any personal data that they hold is kept securely;
- personal information is not disclosed orally, in writing, via Web pages or by any other means, accidentally or otherwise, to any unauthorised third party.

Learner information

Details of learners' personal details, registrations, assessment results and qualification or unit achievements are retained by EPTI for a minimum 40 years. Unless authorised by a learner this information will not be shared with other parties other than EPTI and the awarding body.

Learners wishing to access personal details in relation to awarding body qualifications will be subject to an identity check before any information is disclosed.

In accordance with Condition D4.2 of the Ofqual Conditions of Recognition the awarding body is not obliged to disclose information if to do so would breach a duty of confidentiality or any other legal duty.

9. Ongoing monitoring and review of programmes

9.1 Planning:

The online learning is controlled by the Head of Institution. EPTI invites students to provide feedback based on their learning experiences.

9.2 Implementation:

Following all practical courses, both students and tutors are required to complete a course evaluation document

Following Awarding Organisation external verification, steps may be identified by the exam board to improve practice. In the case of this occurring, this information is provided in the form of feedback or in an action plan for the institute to follow and then provide evidence to the exam board of this feedback/action plan being carried out.

Recommendations indicated through NCFHE QA audit will be noted and actioned.

9.3 Evaluation:

Both tutor feedback and student feedback is recorded in a tracking document so that identified issues can be rectified and improved

9.4 Improvement:

Improvements are made in response to tutor and student course evaluations, and the recommendations made by the Awarding Organisation in their yearly external verification visit reports are actioned to ensure that as an institution, EPTI is always at the forefront of following best practice.

All teaching staff are required to complete self-evaluation sheets of their performance at the conclusion of every two week practical course held. This is to encourage efficient and systematic reflective practice. The assessors' self-evaluation will be recorded within the CPD records.

Furthermore, all assessors are required to maintain and evidence their own individual CPD.