



# LEARNING AND DEVELOPMENT

## POLICIES & PROCEDURES HANDBOOK

Ensuring Fairness, Quality and Consistency in the Provision of Training



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## Plagiarism and Cheating Policy

This policy provides definition and examples of plagiarism and cheating that might occur between centers' or learners and the process for dealing with plagiarism and cheating.

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This policy provides definition and examples of Malpractice and Maladministration that might occur between centers' or learners and process for dealing with the above.

## Conflict of Interests Policy

This policy provides definition and examples of conflicts of interest that might occur and the process the centre has adopted to deal with and prevent conflicts of interest.

## Internal Quality Assurance Process

. This policy demonstrates the adopted internal quality assurance process to ensure fairness and consistency in the delivery, assessment and verification of assignments.

## Equality and Diversity Policy

Gradvert is committed to providing a positive working environment for all learners regardless of gender, age, race or disability. The process to ensure this is achieved is outlined here.

## Data and Confidentiality Protection Policy

This policy outlines the measures and steps to ensure that all confidential information is administered treated as such, in line with the Data Protection Act (1998).

## Appeals Process

Whilst many issues can be dealt with less formally, the purpose of this policy is to demonstrate a formal route for dealing with a decision made by Gradvert or ILM.

## Reasonable Adjustment Policy

This policy provides definition and examples of reasonable adjustments In addition to the process of gaining ILM approval for reasonable adjustments to learning and assessment.

Gradvert's Plagiarism and Cheating Policy applies to all delegates, tutors, verifiers, administrators and assessors involved in the preparation, delivery and assessment of an ILM accredited programme. This policy provides definition and examples of plagiarism and cheating that might occur between centers' or learners. The document provides information on the process for preventing, investigating and dealing with plagiarism and cheating is described along with the need for a formal declaration of authenticity by the learner.

## Definition of Plagiarism

Plagiarism refers to a specific form of cheating which applies to all forms of assessment. Plagiarism involves an individual using someone else's intellectual property, without reference, and presenting it as one's own work.

ILM define plagiarism as the 'substantial unacknowledged incorporation into a learner's work of materials derived from published or unpublished work by another person and presented as if it were the learner's own work. This could include original ideas as well as actual words produced by another, it is important to acknowledge that paraphrasing is not included under the definition of plagiarism. Sources of plagiarism include:

- Books
- Articles
- Materials
- Internet
- Other Learners

Assignments may require learners to work collaboratively at the planning stage, group assessment however is not allowed so the resulting assignments must be submitted individually and verified as the learner's own work. Examples of plagiarism include:

- Extracts from another person's work, published or unpublished, without using quotation marks and/or an acknowledgement of the source.
- Summarising the work of another or using their ideas without an acknowledgement of the source.
- Copying or using the work of another learner (past or present) with or without that person's knowledge or agreement.
- Purchasing essays or downloading them from the Internet to submit them as your own work. This policy therefore applies to assessments submitted for ILM qualifications and programmes, whether regulated or unregulated and whether assessed by the centre or by ILM. The policy also applies to examinations and online tests, as well as assignment tasks that are completed independently by the learner in their own time.

## Preventing Plagiarism

In order to ensure that plagiarism does not occur, Gradvert must ensure that no learner will unwittingly find himself or herself guilty of plagiarism without knowing the implications. It is essential that plagiarism is explained, how it is dealt with, possible sanctions and how to reference appropriately. This will be completed at the induction stage and reinforced in assignment briefings. Following up on this, each learner will provide a formal declaration of authenticity for each assignment.

For a typical assignment, a declaration of authenticity is the learner's confirmation that the assignment is his or her own work without plagiarism. In order to confirm authenticity for assignment-based tasks, Gradvert will require learners to complete the ILM submission cover sheet (see last page).

## Cheating Definition

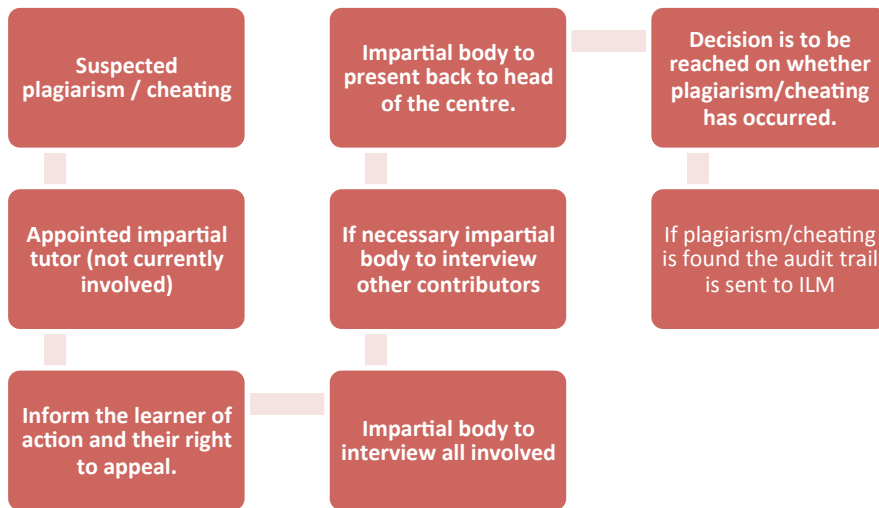
Cheating refers to an attempt to deceive ILM assessors, examiners and/or external verifiers and includes:

- Providing or receiving information about the content of an examination before it takes place, except when allowed by ILM (e.g. case study materials issued before an examination).
- The centre giving excessive help to learners in writing an assignment, or writing any of it for them.
- Impersonating or trying to impersonate a learner, or attempting to procure a third party to impersonate oneself.
- Copying or reading from the work of another learner or from another learner's books and notes etc.
- Offering a bribe of any kind to an invigilator, examiner or other person connected with assessment.
- Any attempt to tamper with assignments after the learner has submitted them.
- Fabricating or falsifying data or results by individual learners or groups of learners.

## Dealing with Plagiarism and/or Cheating

Gradvert's internal process for Plagiarism or Cheating is supervised by the Head of Centre. Once the internal process has taken place, ILM will review the steps taken. It is the responsibility of the Centre Manager to inform the ILM Quality and Compliance Manager at the earliest opportunity, preferably before starting the investigation. The following steps should be taken to deal with plagiarism or cheating.





If cheating and/or plagiarism has been found, the ILM will have the final decision on any action taken. To this end, ILM will audit the centre's investigation and examine the proposed sanctions. At the conclusion of Gradvert's investigation the Head of Centre should inform the Head of Quality and Compliance by emailing [ILMRegulation@i-l-m.com](mailto:ILMRegulation@i-l-m.com) within 30 working days of the original incident. Before ILM's review of your investigation can start, you must provide auditable evidence:

- The centre's policy on plagiarism and cheating.
- Evidence to show the centre advises learners on plagiarism, cheating and authenticity.
- Details of learners.
- The learners declaration of authenticity for the particular piece of work in question.
- If relevant, the plagiarized work and, if available, the original from which it was copied.
- Clearly described document indicating the plagiarism or cheating and the qualification and units affected.
- An assessment of the impact the plagiarism or cheating could have had on the learner's result.
- Records of the centre's investigations.
- The sanction recommended by the centre.

The Head of Quality & Compliance will then appoint an ILM lead reviewer. In order to maintain a complete audit trail, all subsequent communication between the centre and ILM with reference to the case should be copied to the [ILMRegulation@i-l-m.com](mailto:ILMRegulation@i-l-m.com) inbox. The lead reviewer will examine all relevant evidence and review the centre's investigation and proposed sanction. He/she will then write a report on the outcome and recommend the sanction(s) if any.

The report will be presented to members of the ILM Quality & Regulatory Group for a decision on the sanction(s) to be imposed. The centre will be informed of the outcome. This will normally be achieved via the monthly meeting but, if time does not permit this, it can be reported to members of the group outside of the regular meeting cycle. The full Quality & Regulatory Group will then ratify the outcome at its next meeting.

## Action

Gradvert will propose possible sanctions to ILM but the action taken is ultimately the decision of ILM. Sanctions for the learner may include:

- Adjusting the marks given for the assessment, test or examination
- Requiring the learner to redo one or more assignments and re-submit for assessment, with the award of a minimum mark in the event of pass.
- Requiring the learner to re-sit the test or examination.
- Withholding full or unit certification.
- Withdrawing membership.
- Withholding certification and withdrawing membership.
- Disqualification from the qualification and refusing to accept further test or examination entries.
- Debarment from further certification and or/ registration.

If Gradvert has been found to be negligent, then sanctions will be imposed on the centre, these include:

- Warning
- Action Planning
- Removal of Direct Claim Status (N/A)
- Change of QQR to provide increased monitoring and quality assurance.
- Appointment, at the centres expense, of independent invigilators.
- Requiring the centre to use ILM Assessment (ILMA) for a period.
- Suspension of registration and/or certification.
- Withdrawal of qualification approval for the qualification in question.
- Withdrawal of centre approval or provider recognition.



Gradvert's Malpractice and Maladministration Policy applies to all delegates, tutors, verifiers, administrators and assessors involved in the preparation, delivery and assessment of an ILM accredited programme. This policy provides definition and examples of Malpractice and Maladministration that might occur between centers' or learners. The document provides information on the process for preventing, investigating and dealing with Malpractice and Maladministration.

## **Definition: Malpractice by Gradvert**

Malpractice (by Gradvert/tutors) – Malpractice is any activity or practice, which deliberately contravenes procedures and regulations. It means that there are serious concerns about the integrity of the assessment or the validity of certificates. Examples of malpractice include:

- Deliberate misuse of the ILM Logo.
- Contravention of examination regulations by Gradvert.
- Falsification of documentation.

## **Definition: Malpractice by Learners**

Malpractice is any activity or practice, which deliberately contravenes procedures and regulations. It means that there are serious concerns about the integrity of the assessment or the validity of certificates. Examples of malpractice include:

- Cheating of any nature by learners, including plagiarism.
- Deliberate misuse of the ILM Logo
- Contravention of examination regulations by the learner.
- Repeated maladministration.

## **Definition: Maladministration**

Maladministration is an activity or practice, which results in non-compliance with regulations, but it is normally the result of a genuine mistake rather than any deliberate plan to gain an unfair advantage. If Gradvert were to repeatedly make mistakes this would eventually constitute Malpractice. Examples of maladministration include:

- Late registration of learners with ILM
- Claiming certification for incorrect units.
- Poor monitoring and tracking of delegates

## Malpractice and Maladministration Process

In order to avoid malpractice and the associated consequences, Gradvert will follow the following process advised by ILM:

- Identified Malpractice or Maladministration reported to Head of Quality and Compliance.
- The Head of Quality will appoint a lead independent investigator to respond in 30 days.
- Maladministration errors will be referred to the Quality Manager and External Verifier to agree action to prevent future occurrences.
- The outcome will be communicated to the centre and other relevant parties no more than 10 days later.

## Malpractice and Maladministration Action

The ILM Quality Regulatory Group will oversee the investigation process and will ratify the outcome. If the investigation confirms that malpractice by a centre/provider has taken place, dependent on the gravity and scope, one or more of the following actions will be taken:

- Disallowing all or part of a learner/s assessment evidence or marks
- The learner/s certificates will not be issued or previously issued invalid certificates for that learner will be withdrawn.
- No further registrations will be accepted for the learners.
- Your centre or provider risk rating will be reviewed which could lead to the suspension of registrations, and approvals.
- A report will be made to the relevant regulatory bodies and may be shared with other awarding organisations and/or other agencies such as funding bodies or the police.
- ILM membership may be withdrawn for the learner/s.
- Corporate or individual tutor membership may be withdrawn.



All staff, volunteers, and management members of Gradvert will strive to avoid any conflict of interest between the interests of the organisation on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

## Examples of Conflict of Interests

1. A staff member with decision-making capacity who is related to one of the course delegates.
2. Any member of the assessment team who has an invested interest in any of the delegates.
3. The course tutor acting in the capacity of assignment assessor in addition to the internal verifier.

All members of the delivery team are provided with a copy of the conflict of interest's policy prior to the commencement of the project, in order to highlight any potential causes of conflict.

In the course of meetings or activities, staff members will disclose any interests in a transaction or decision where there may be a conflict between the organisations best interests and the staff member's best interests or a conflict between the best interests of two organisations that the staff member is involved with.

After disclosure, I understand that I may be asked to leave the room for the discussion and may not be able to take part in the decision depending on the judgment of the other committee members present at the time.

Any such disclosure and the subsequent actions taken will be noted in the minutes of the meeting.

This policy is meant to supplement good judgment, and staff, volunteers and management committee members should respect its spirit as well as its wording.

**Full Name:**

**Position:**

**Date Adopted:**

Gradvert enforces a strict standardisation process in order to ensure fairness and consistency across the board of delivery, assessment and verification. The standardisation strategy involves meetings between; the centre manager, trainers, assessors and internal verifiers.

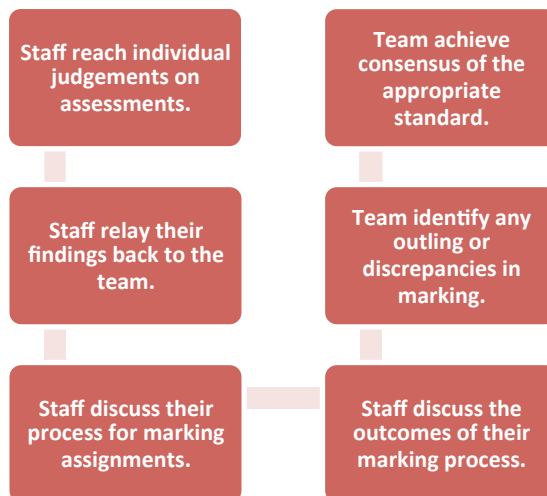
Standardisation meetings will take place before, half way through and at the end of the first cohort of every new programme. The focus of the meeting is to ensure:

1. All parties involved with the delivery, understanding the way the Centre is run and managed.
2. There is a seamless link between the delivery of the modules, delegate's workbooks and the assignments.
3. All parties understand and agree the assignment timetable and coaching sessions.
4. There is a strong feedback mechanism between the centre, trainers, assessor and IV.

Following that there will be a minimum of two full team standardisation meetings to be held each year and all centre staff will be required to attend these. In addition to the monitoring of programmes and relaying of information, these meetings will be used to contribute to the standardisation of delivery, assessment and verification.

## Standardisation Exercise

In order to ensure consistency in Gradvert's approach to standardisation, the following exercise will be adopted for all ILM accredited programmes being delivered. This will ensure that the assessment of delegate assignments will be accurate and valid.



## **ILM Statement:**

We are committed to equal opportunities for all, regardless of sex gender reassignment, marital status, civil partnership, physical status or any disability, racial or ethnic origin, nationality, creed or religious belief, sexual orientation, age, pregnancy and maternity or employment status. We seek to ensure implementation of our qualifications and programmes are without disadvantage to any learner that has or any group of learners that may share any of these characteristics.

## **Gradvert Statement:**

Gradvert is committed to providing a working environment in which delegates and associates are able to realise their full potential and experience a positive and engaging programme irrespective of their gender, age, race, or disability.

In order to create conditions in which this goal can be realised, Gradvert is committed to identifying and eliminating discriminatory practices, procedures, and attitudes throughout the organisation and within it's practice. Gradvert expects employees and associates to support this commitment and to assist in its realisation in all possible ways.

Specifically, Gradvert aims to ensure that no course delegate is discriminated against, either directly or indirectly, on the grounds of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation.

Equal Opportunities practice is developing constantly as social attitudes and legislation change. Gradvert will keep its policies under review and will implement changes where these could improve equality of opportunity. This commitment applies to all of the Employer's employment policies and procedures, not just those specifically connected with equal opportunity.

## **Outcome:**

ILM Quality and Compliance Managers and External Verifiers monitor the effectiveness of Gradvert's Equality and Diversity policy to ensure that it runs through all internal procedures relating to the; recruitment, preparation and assessment of learners for an ILM qualification.

## **Action:**

The ILM External Verifier will monitor the implementation of Gradvert's Equality and Diversity Policy. Gradvert are response for demonstrating consistency in the delivery of such policy.

## **Continuous Improvement:**

We aim to improve our processes and our response to customers in light of learning from the feedback we receive. This policy shall be the subject of a three year review cycle or a review as necessary.

## ILM Statement:

The Data Protection Act 1998 ('Act') places obligations on those that control and process information relating to individuals. Whilst this is UK-based legislation, ILM believe it represents best practice and requires all centres to comply with these provisions. ILM requires that Gradvert's data protection notice allows centres to transfer data to ILM and City & Guilds in relation to personal data for the following purposes:

- to identify a living individual ('personal data')
- to undertake administration in relation to the qualification for which the learner is registered including providing to you a certificate on successful completion of the learner's qualification or specified units of it
- to contact learners directly in relation to studying membership, ILM centre approval or qualification approval and/or quality control purposes undertaken by ILM for the qualifications for which the learner is registered;
- to inform learners of products or services offered by ILM or City & Guilds
- to disclose to its regulators where so required; and
- to disclose to relevant industry bodies where so required by law to; account for learners where there is a requirement to do so; and to contact a learner directly if there is a requirement for such bodies and the information is not readily accessible by other means.

ILM may have to transfer the Personal Data outside the European Economic Area (EEA) and if we do, ILM and City & Guilds make every reasonable effort to ensure that any data we transfer receives the same protection as if it would within the EEA.

## Gradvert Statement:

Programme delegates may be required to give certain information relating to themselves in order that Gradvert may properly carry out its duties, rights and obligations. Gradvert will process and control such data principally for personnel, administrative and payroll purposes. The term 'processing' may include Gradvert obtaining, recording or holding the information or data or carrying out any set of operation or operations on the information or data, including organising, altering, retrieving, consulting, using, disclosing, or destroying the information or data. Gradvert will adopt appropriate technical and organisational measures to prevent the unauthorised or unlawful processing or disclosure of data.

## Confidentiality Statement:

Gradvert are committed to ensuring confidentiality for all delegates at all stages of the programme. All individuals involved in the delivery team acknowledge that information (including assignments) provided by delegates is confidential; therefore the team will not disclose any information without prior written consent from the delegate.

Full Name and Position

Signed

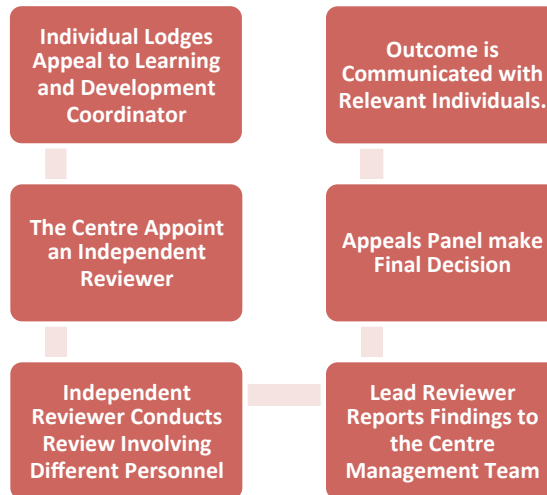


Our aim is to provide everyone an excellent experience when dealing with Gradvert and ILM. Although many issues can be dealt with less formally, this policy provides a formal route for dealing with an ILM decision with which you may disagree: Both Gradvert and ILM aim to ensure that:

- Making an appeal is as easy as possible
- The review is conducted in a fair, reasonable and legal manner, ensuring that all relevant information is considered without bias.
- We deal with it as promptly as possible, politely and, when appropriate, confidentially.
- We respond in the right way, for example by giving you an explanation or an apology where we have got things wrong and letting you know what action has been taken.
- We learn from appeals that were upheld and use them to improve our service.

## Gradvert's Appeals Process

Appeals must be received by Gradvert no later than 30 days of the incident itself. Any appeal must be received by the learning and development coordinator either by hand or electronically (e.g. via e-mail), verbal appeals will not be accepted. Once received, Gradvert will follow the process below to reach a decision on the appeal itself.



## ILM's Appeals Process

If an individual feels the decision reached by the centre is still unjust, the individual can register an appeal against the centre by contacting ILM. This appeal should be e-mailed to ILM's regulation and quality improvement manager using [ILMregulation@i-l-m.com](mailto:ILMregulation@i-l-m.com). To understand the steps involved in this process, please download ILM's guide to dealing with appeals, found on the ILM website, [www.i-l-m.com](http://www.i-l-m.com)

This policy provides definition and examples of Reasonable Adjustments which may occur for a learner or group of learners during an assessment. The process of gaining ILM approval for a Reasonable Adjustment is describe and as a centre, Gradvert comply with this process.

## Definition: Reasonable Adjustment

Learners who have a permanent or temporary disability, specific learning needs or medical condition might need extra support to help them complete the programme. In order to make sure that their result reflects their achievement in the assessment, they might also need a different assessment method of an adaptation to the usual one. The assessment criteria and standard cannot be changed, but we can take action to give learners a fair and equal change of demonstrating their knowledge, skills and understanding to achieve the assessment standard.

What is 'reasonable' depends on individual circumstances, the impact of the disability on an individual, cost implications and the practicality and effectiveness of the adjustment. Adjustments to assessment must:

- Not make the assessment easier.
- Not give the learner an unfair advantage.
- Be based on the individual need of the learner.
- Be auditable and capable of being internally and externally quality assured.
- Preferably reflect the learner's normal way of working.
- Give a realistic indication to a potential employer of what the holder of the certificate can do.

Examples of reasonable adjustment may involve:

- Changing standard assessment arrangements e.g. providing extra time to complete.
- Adapting assessment material e.g. providing materials in braille
- Providing facilitators during assessment e.g. a sign language interpreter or a reader.

## Process for Reasonable Adjustment

As an approved centre for ILM, Gradvert are responsible to inform and receive sign off for any reasonable adjustments. Gradvert will request approval by emailing the Chief Assessor at ILM, providing information on:

- Which qualification / programme and which assessment?
- Centre's assessment of the learner's need.
- Reason for the application and why ILM's standard assessment process is inappropriate.
- Proposed adjustment and rationale.

Any requests should be made at least 10 working days in advance of the intended use of the assessment activity. Reasonable adjustments must be approved by ILM before the assessment activity takes place.