INTERNAL VERIFICATION AND MODERATION POLICY & PROCEDURE

GUIDANCE
Values | Vision | Tone of Voice

Values

- Do the right thing
- Learners are at the centre of everything we do
- Continuous improvement
- Innovation through collaboration
- Developing and empowering staff

Vision

Transforming lives through learning

Tone of voice

Our tone of voice takes its direct influence from our core values.

We are passionate about people and learners and are driven to get the best out of everyone by getting to understand them. We are caring and supportive, as well as being determined and strive for growth. We talk with purpose and enthusiasm in a way that connects and empowers people.

Innovation is at the heart of Learning Curve Group and we're always thinking about what's next!

SUMMARY CHANGES

Date	Page	Details of amendments
01/05/2019	All	Full Policy and Procedure review

I. INTRODUCTION

Here at Learning Curve Group (LCG) we ensure that our core values take priority when conducting quality assurance activities. LCG operates a robust internal quality assurance system to maintain the consistency and accuracy of assessments.

Applies to:

This policy applies to any Internal Quality Assurer / Moderator and delivery staff working on LCG, Profound Services Limited and Northern Care Training (NCT) contracts.

Reason for policy:

These activities will be carried out in order to ensure that training and assessment practices are monitored to ensure that they meet Awarding Organisation standards.

II. POLICY

LCG is committed to an evaluative developmental process that aims to:
- provide a continuous check on the consistency and quality of delivery and the consistency, quality and fairness of marking, grading and overall assessment of learner's work
- meet and exceed the requirements placed upon us by QCA, the Awarding Organisations, End-Point Assessment Organisations and LCG standards
- ensure that valid assessment decisions are reached for all our learners and that external requirements are fully met
- support delivery staff in their delivery by affording them the opportunity to receive critically supportive comments and to be able to conduct peer observation
- support delivery staff in their assessment activities by affording them the opportunity to receive critically supportive comments on the assessment decisions reached

The key features of an effective system are that it must:

- include the monitoring of assessments and a way of standardising assessment judgements
- sample assessments on a 'formative, interim and summative' basis, therefore giving feedback to delivery staff on an ongoing basis (not at the end of the accreditation process)
- support and develop the assessment teams
- accurately record the IQA/Moderation decision to provide a clear audit trail
- be carried out by suitably qualified and occupationally competent staff

III. DEFINITIONS

QAM – Quality Assurance Manager

IQA – Internal Quality Assurer

QDM – Quality Development Manager

IV. RELATED POLICIES

Teaching, Learning and Assessment Handbook
Curriculum Product and Service Handbook
Observation Handbook
Quality Assurance Handbook

Storage of Assessment Records

All assessment records relating to individual learners should be retained for 3 years. The records should be held in a secure place and contain details of the learner, delivery staff, IQA/Moderator, enrolment, registration/EPAO registration and certification. These records should be supported by assessment records and IQA/Moderation documentation. This is in line with GDPR and LCG procedures around data handling. This work is stored either through scanning all information into a system or hard copies are stored using an external company.

EQA/EPA Coordinator

The EQA/EPA coordinator is responsible for overseeing communications and visits by Awarding and End Point Assessment Organisations, including those for centre/course approval and those associated with assurance and verification of qualifications. The role will also be the Quality Lead for the end to end process of End Point Assessment with the company. The role is to be:

• The first point of contact between the centre and Awarding Organisation/End Point Assessment Organisation

• Ensure policies and procedures are in place and current versions are used to support the quality assurance process.

• Ensure policies and procedures are reviewed regularly and updated in line with current Awarding guidance and with centre decisions

• Provide required data and information to external bodies to allow all parties to fulfil contractual agreement

• Plan all activities according to sampling requests and prepare the IQA/Moderation team members to meet the expected outcomes of the day

• Enable IQA/Moderation and delivery staff to meet on a regular basis, including standardisation, sharing best practice amongst IQA/Moderation and delivery staff

• Ensure all learners are registered with AO and EPAO within the required timeframes, as noted in the agreement

• Support and oversee the delivery and IQA teams through the EPA process and required milestone achievements and associated documentation

• Undertake IQA/Moderation and quality activities to ensure a current understanding of the learner journey

• Provide support and guidance to delivery and quality teams, in relation to themes and trends across all external sampling and end-point assessment

• Review all received reports and action plan the sharing of best practice and further training as required

• Liaise with Awarding quality assurance staff and delivery staff/IQA when EQA staff visit

• Circulate EQA reports to appropriate stakeholders, ensuring that any required actions and development points identified are discussed and acted upon within agreed timescales

• Ensure all data passed on by IQA's/Moderation MIS and delivery staff is processed and submitted to Awarding Organisations/EPAO within according to LCG's data management policy

• Ensure relevant LCG staff check for the correct learner Unique Learner Number (ULN) and for Scotland Scottish Candidate Number (SCN) of new learners/candidates

• Notify Awarding Organisations of any changes that may affect LCG's ability to meet quality assurance.

Internal Quality Assurers/Moderators

The IQA/Moderator maintains and monitors the quality and assurance of qualification, unit delivery EPAO requirements and certification. They are the main contact between the centre and AO/EPAO in relation to monitoring activities. The IQA/Moderator supports all delivery staff to ensure that assessment processes and practices have been adhered to and assessment decisions are consistent across all delivery staff.

Role of the Internal Quality Assurers/Moderators is to:

• Ensure only appropriately qualified staff can carry out IQA/Moderation. Staff are required to submit evidence of their Assessor Award and Verifiers Award or, for moderation, they are required to have relevant occupational competency

• Verify the activites of the trainee Internal Quality Assurers whp underatke IQA by countersignatory

• Undertake IQA/Moderation continuously throughout the year. Each programme will identify appropriate periods of time when IQA/Moderation takes place

• IQA/Moderator complete relevant samples of learners' work per course at the allocated point in each programme. The sample will be pre-selected at the start of each course. For each course, the sample must include every learner, at least one of each assessment and each assessment type

• Undertake sampling across all delivery staff, all types of evidence and all learners, including planning, feedback, reviews, ILP and teaching and learning, EPA mock

readiness activities in addition to learner evidence on apprenticeships and 7 working days for classroom based and flexible learning.

• Complete the final IQA/Moderation within 5 working days of the completion of the course. In the instance that a learner is past planned end date (PPED) final IQA/Moderation must be completed within 2 working days. Where discrepancies are found, the IQA/Moderator will judge if the severity of the issue needs to be escalated to the relevant stakeholder within 24 hours to discuss appropriate action. Where the discrepancy doesn't warrant escalation the IQA/Moderator will action directly with the relevant delivery staff

• Ensure all delivery staff hold and maintain the required qualifications and occupational expertise to deliver the qualifications and units they have been assigned to

• Ensure that delivery staff follow the assessment guidance provided

• Advise and support delivery staff to assist them in interpreting and applying the standards/course criteria correctly and consistently

• Provide delivery staff with prompt, accurate and constructive developmental feedback on their assessment decisions

• Identify training needs and provide ongoing training to delivery staff to continually improve the standard of qualification and unit delivery, to raise good practice in assessment

• Facilitate standardisation activities to support the continuous improvement of qualification and unit delivery

• Regularly sample assessment activities, methods of assessment and records to monitor consistency of assessment decisions as specified by the qualification criteria following LCG policies and processes for relevant e-portfolio platform to confirm verification. To complete IQA/Moderation reports and summary following the e-portfolio platform
• Maintain CPD records on Purple People and have those available upon request from Awarding Organisations EQA

• Contribute to LCG policies, procedure, learning and assessment material, including schemes of work and delivery models and resources working closely with the curriculum team

• Participate in any assessment appeal as indicated in the LCG appeals procedure

• Participate in any complaint as indicated in the LCG complaints procedure

• Attend any Awarding Organisations EQA visit as required

• Aware of the risk of malpractice/maladministration and act according in line with the LCG procedure

• Conduct observations of delivery staff conducting the assessment process

• Conduct learner / employer (where relevant) interviews to monitor and analyse the quality of the assessment process and learner journey

• Ensure that equal opportunities, British Values, Safeguarding including Prevent and anti-discriminatory practices are upheld in the assessment process, fully understood and embedded to all learners and any concerns are escalated.

• Liaise with other staff members and the External Quality Assurer to implement the requirements of the Awarding Organisation

• Ensure that all learners' achievement records and centre documentation are completed in accordance with Awarding Organisational/LCG requirements

• Attend standardisation meetings and maintain a current continuous professional development file

Delivery staff

The role of a member of the delivery staff is to:

Teaching, Learning and Assessment

• Support the learners through the qualification

• Provide remediation and re-assessment for learners where necessary

• Assess learner evidence against the National standards.

• Record assessment decisions and provide feedback to learners on submitted evidence

• Identify and support learners who require assessment arrangements

•Discuss learner's assessment arrangements with colleagues to ensure a standardised approach

Own Development

• Attend and participate in standardisation meetings

• Engage in training and coaching activities in line with the individual TNA

• Maintain a CPD record and make this available to Awarding Organisations external quality assurance staff on request

Assessment Practice

• Contribute to the LCG's review of policies, procedures, learning and assessment material and resources

• Participate in any assessment appeal as indicated in the LCG appeals procedure

• Participate in any complaint as indicated in the LCG complaints procedure

• Attend and participate in any visits by Awarding Organisations quality assurance staff, as required

• Aware of malpractice/maladministration and act according to the LCG procedure

• Ensure that each learner is aware of his/her responsibility in the collection and presentation of evidence

• Agree and record teaching and learning (ILP) and assessment plans with each learner

• Fully brief learners on the assessment process, including EPA were applicable

• Observe learners' performance through formative assessment and/or in simulated situations, and/or conduct other forms of assessment in accordance with the qualification requirements

• Ensure that assessment of performance by observation is unobtrusive and is in accordance with Health & Safety and Safeguarding legislation

• Judge the evidence and record assessment decisions against the standards/course criteria

• Provide learners with prompt, accurate and constructive feedback

• Ensure validity, authenticity, currency and sufficiency of evidence

• Maintain accurate and verifiable learner assessment and achievement records

• Confirm that learners have demonstrated sufficient competence/knowledge and have completed the required documentation

• Agree new assessment plans with learners where further evidence is required

• Demonstrate commitment to anti-discriminatory practice, equal opportunities, British values and safeguarding, including on-line safety and the Prevent strategy

• Ensure maintenance of confidentiality for all information, in line with LCG Data Protection Policy

Sampling Strategy - Apprenticeships

Four forms of sampling will be carried out to ensure that quality assurance is maintained. These are:

1. Initial Administration Check – IQA's will check the compliance of all learner's qualification at 20% of their time on programme. As an example, a learner is enrolled onto a Health & Social Care Level 2 Apprenticeship, their portfolio will be sampled by the IQA in the first instance in and around week 10 of the start of the programme. This check will include; credit value selected is correct, all enrolment and relevant compliance documentation is uploaded onto the e-portfolio, 20% Off the Job (OTJ) time log reflects learner entitlement and where appropriate learner log is uploaded onto e-portfolio (where relevant to qualifications enrolled post May 2017), learning has taken place within the first 10 weeks of the programme and the learner has been registered with appropriate Awarding Organisation

2. Interim Sample – In accordance with IQA sampling plan, IQA's will complete their formative sample of the learner's portfolio, ensuring the evidence is satisfactory to meet the VARCS assessment criteria and the learner is on track with their Apprenticeship. This sample will be carried out at 50% of the learner's time on programme. The IQA needs to at this point ensure the relevant learners are progressing sufficiently for Gateway readiness (where relevant)

3. Summative Sample - In accordance with interim and sampling plan, IQA's will complete their summative sample of the learner's portfolio at 90% of the learner's time on programme. At this point IQA's will be ensuring that assessment decisions meet the VARCS assessment criteria and signing units off for claim prior to the final completion being submitted. For standards, IQA's need to confirm that all necessary elements of the Apprenticeship that are required prior to entering Gateway are complete and the Gateway readiness documentation is signed and submitted to QST prior to that learner entering Gateway

4. Final Check – This will take place once the learner's portfolio has been submitted to IQA for completion. At this check IQA's will be closing down actions set for interim/summative sampling activities and any outstanding sampling

All sampling must be pre planned by the IQA on the e-portfolio and sampling activities booked in at the start of the learners Apprenticeship.

Sampling RAG Rates

Different RAG rates for sampling will be adopted dependent on the experience of the delivery staff delivering the qualification or unit they have been assigned to as follows:

Category	Required Activities
RED: Newly qualified delivery staff, new qualification to the delivery staff member or delivery staff member who is continually falling short of the standard required	100% sampling rate

AMBER: Delivery staff who are in need of development but often meet the standard required	50% sampling rate
GREEN: Delivery staff who are experienced with the qualification with LCG or unit and continually meet the standard required	20% sampling rate

The RAG rates above may be subject to change, for instance:

• where a qualification is new to the centre, the first cohorts will be sampled at a 100% rate unless otherwise authorised by the Awarding Organisation

• where the sampling strategy of the Awarding Organisation overrides that of the centre due to the risk rating or actions resulting from monitoring activities

• where a contractual requirement requires additional sampling to take place (N.B. this will not override the requirements of the previous two instances where this sampling rate would require a lesser sampling rate to be adopted)

All IQAs will sample every learner on the delivery staff's caseload and sample at least 3 units per learner (these will vary by learner), the sampling rate will be determined by the RAG rating as above. The sampling rate will depict the amount of learning outcomes that are sampled in a unit. Examples of this are as follows:

1. Delivery staff member A is RAG rated red as a result of being a new member of staff. They currently have 20 learners on their caseload, each learner is enrolled onto a health and social care diploma with 18 units. The IQA will sample all 20 learners and will select 3 units per learner. Within the units the IQA will sample ALL of the learning outcomes thus sampling all assessment methods used in that unit.
2. Delivery staff member B is RAG rated Amber as a result of development needed around their assessment practices. They currently have 20 learners on their caseload, each learner is enrolled onto a health and social care diploma with 18 units. The IQA will sample all 20 learners and will select 3 units per learner. Within the units the IQA will sample 50% of the learning outcomes
3. Delivery staff member C is RAG rated Green as a result of being an experienced member of staff. They currently have 20 learners on their caseload, each learner is enrolled onto a health and social care diploma with 18 units. The IQA will sample all 20 learners and will select 3 units per learner. Within the units the IQA will sample 20% of the learning outcomes.

Sampling Strategy - Classroom Based Learning

Due to the variety of course lengths and qualifications the sampling strategies across classroom-based provision varies depending on the programme. The programmes included within Classroom based provision are: Pathways, Academies, Skills Division: Advanced Learning and Skills Division: Workplace Learning/Functional Skills. That said:

Summative Sample – In accordance with the sampling plan set for the delivery staff member and course, summative sampling will take place within 7 working days of receiving the completed portfolio.

Sampling Rate – Classroom Based Learning

All IQAs / Moderators will apply the RAG rating of the delivery staff member to the batch of learner portfolios received. For example:

1. Delivery staff member A is RAG rated Red as a result of being a new member of staff. They have submitted 12 learners' portfolios for completion following their recent classroom-based course. The IQA will sample all learners with a fair sample of all units across all learners.
2. Delivery staff member B is RAG rated Amber as a result of development needed in their assessment practice. They have submitted 12 learners' portfolios for completion following their recent classroom-based course. The IQA will sample 50% of learners with a fair sample of all units across all learners.
3. Delivery staff member C RAG rated Green. They have submitted 12 learners' portfolios for completion following their recent classroom-based course. The IQA will sample 20% of learners with a fair sample of all units across all learners.

Sampling Strategy – Skills Division - Flexible Learning

Due to the variety of qualifications the sampling strategies across classroom-based provision varies depending on the programme. The programmes included within Flexible Learning is all distance learning programmes.

Summative Sample – In accordance with the sampling plan set for the delivery staff member and course, summative sampling will take place within 7 working days of receiving the completed portfolio.

Sampling Rate – Skills Division - Flexible Learning

All IQAs / Moderators will apply the RAG rating of the delivery staff member to the qualification they are delivering. Pro solution is used to determine the sampling plan applied to completions being submitted by the delivery staff.

Standardising Assessment and Quality Assurance/Moderation Judgements

Standardisation (benchmarking or moderating) is an important part of the duties of the IQA/Moderator.

Regular meetings will be held to conduct standardisation exercises:

Meetings to be held for departments:

• Flexible Learning: quarterly basis

• Apprenticeships: twice a year

• Pathways: quarterly basis

• Academies: quarterly basis

Standardisation activities should include:

• Induction activities that explain the assessment/EPA process (where applicable) and the part played in it by all involved parties (learners, assessors, employers, IQA/Moderators). This should include a good understanding by learners of the appeals procedures, induction activities, learner handbook, teaching and learning activities and/or portfolio/EPA, etc

• Identifying good practice and areas of improvement in assessment, which is disseminated to all parties involved – for example, carrying out activities on specific units/standards to reinforce assessment/teaching and learning methods are consistent with the assessment strategy/EPA assessment requirements (where applicable)

• Meetings to cover feedback from AO/EPAO monitoring activities, assessment of good practice and interpretation of assessment criteria/qualification specifications and EPA standards

• Encouraging diversity of evidence such as digital strategies to demonstrate assessment, rather than expecting to see written evidence in a portfolio

• Ensuring assessment practice follows AO/EPAO requirements, shows the learner's journey and creates a clear audit trail

• Linking staff development planning and reviews to ensure qualification specific requirements for assessment are met in line with the AO/EPAO

• Delivery staff development will be recorded, and they must update their CPD with details of development. All delivery staff are encouraged to continually develop their skills and knowledge in their assessment sectors and in teaching and training techniques

• All delivery staff must attend these meetings unless they are on Annual/Sick/Special Leave. Other meetings and visits must not be scheduled when standardisation meetings are scheduled. Line Managers must authorise absences from standardisation

• Minutes of meetings are to be produced and copies kept for viewing during Awarding Organisation's monitoring activities, this is to be electronically stored and held with EPA/EQA Coordinator and QST Team

Conflicts of Interest in Assessment and Observation

LCG has a process to identify, monitor and manage any conflicts of interest in assessment and observational outcomes. LCG will take all reasonable steps to avoid any part of the assessment of a learner being undertaken by any person who has a personal interest in the result of the assessment. The delivery staff will not quality assure their own assessments; this also includes internal quality assurance activities Observations of Teaching, Learning and Assessment (OTLA) and Learning Walks

Also the delivery staff can not have their assessment activity assured by a person/family member who has a personal interest in the outcome.

Interview of Learner

Once a year, the IQA/Moderator will interview at least one learner for each of their allocated Delivery staff. There are set interview questions on the Learner Interview Record, all of which should be asked, but not all may be applicable.

Once complete, a copy of the record should be forwarded to the Quality Assurance Manager and the original kept within the quality assurance folder on the quality drive.

Support and Staff Development

The IQA / Moderation policy must be applied to every programme with work that is internally assessed, and which contributes to the final assessment outcome of a learner.

• Appropriately qualified staff must carry out all IQA/Moderation. Staff are required to submit evidence of their NVQ assessor award and IQA Award or, for moderation, they are required to have relevant occupational competency.

• Delivery staff and IQA/Moderators must be given sufficient time, resources and authority to perform their roles and responsibilities effectively.

• Where trainee IQAs undertake IQA, this must be verified by a qualified IQA and countersigned.

• Any evidence that is produced must meet the requirements of the Awarding Organisation and LCG requirements.

• The evidence must be recorded on appropriate documentation, which takes into account the requirements of Awarding Bodies and LCG requirements.

• Evidence that IQA practice has taken place must be available for monitoring by the Quality Assurance Manager.

• Internal monitoring of IQA activity will be carried out via the Quality Assurance Manager.

• Records of IQA must be kept in a secure location and accessed by staff authorised to do so.

• All IQA or Moderation must be in line with current Awarding Body and joint Awarding Body recommendations.

• IQAs must attend standardisation meetings and maintain a current continuous professional development