



The National Association of  
School-Based Teacher Trainers

# Policies and Procedures for Initial Teacher Training (ITT)

Guidance materials for accredited ITT providers  
setting up or reviewing their policies and procedures

E&OE (Errors & Omissions Excepted)

**Third Edition**  
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The National Association of School-Based Teacher Trainers

Policies and Procedures for Initial Teacher Training (ITT) (Third Edition: February 2024)  
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## Introduction

This guidance is designed to support accredited ITT providers develop and review their policies and procedures.

The different legal entities and histories of accredited ITT providers means that this guidance cannot provide for every eventuality. Therefore, this guidance seeks to provide general principles and examples from which accredited ITT providers can draw what is most applicable to their situation.

Accredited ITT providers should refer to the [ITT criteria and supporting advice](#) for additional information.

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## Absence

1. What do you define as “absence”?
2. How are you going to monitor and confirm absence from placements, central training and any locally agreed supplementary training?
3. What is an acceptable level of absence?
4. How is absence for medical reasons such as illness differentiated from medical appointments?
5. How are you going to manage compassionate leave for the emergency care of a relative?
6. What level of absence, or regularity of absence, constitutes a risk to the trainee being able to reach the requirements for your programme to gain the evidence for the award of QTS?
7. Will a certain level of absence be a trigger for your cause for concern process?
8. Will your policy cover absence due to national emergency, industrial action or public transport disruption?
9. What are the reporting systems and communication channels between the trainee, the placement mentor, the professional tutor and the training provider?
10. What guidance do you provide for the timely notification of absence to all relevant parties?
11. How will maternity, paternity and adoption leave be considered? Will these fall under the absence policy or will they be separate?
12. How will absences in regard to mental health issues be considered and supported?
13. Can absences lead to the termination of placements? If so, what is the procedure?

[An example absence policy is available in Appendix 1.](#)

## Assessment (See also [marking](#))

1. What is the purpose of each assessment?
2. Are the assessment practices used formative or summative? How do they help develop the trainee’s teaching further?
3. How are assessments moderated? How are assessments externally examined? When assessing in collaboration with a PGCE provider, how is this co-ordinated, moderated and externally examined?
4. Who sets the criteria for formal assessments? How is the assessment criteria quality assured? Is the criteria in line with your curriculum and (for summative assessments) the ITT criteria?
5. How are trainees introduced to the assessment process?
6. What is the feedback mechanism for submitted and assessed work?
7. Is there an appeals mechanism where a trainee can request a remark of submitted work?
8. How will late submissions affect assessment practices?
9. How will plagiarism impact on assessment outcomes?
10. How will mitigating circumstances be considered in relation to submission and assessment?
11. How are assessors trained and their assessments moderated?

## Cause for concern (support plan)

1. Who is able to raise a cause for concern, under what circumstances and what is the process for doing so?
2. What formal process is followed once a cause for concern is raised? How is it communicated to all parties concerned (trainee, mentor, professional tutor, school placement, partnership, etc.)?
3. Who is responsible for which aspects of the process? What timelines are assigned to each stage?

4. Are there any circumstances in which the normal process is not followed (for example in the case of a cause for concern relating to safeguarding)? If so, are you clear on when and how alternative processes can be actioned?
5. Are concerns relating to Part 2 of the Teachers' Standards dealt with under the same process as Part 1? If not, how do these differ?
6. Where a cause for concern is not resolved, what is the process under which a programme is terminated?
7. Do you have sufficient layers built into the process to allow independent parties to review each stage?

### **Child protection ('at risk' pupils) and safeguarding (all pupils)**

1. Does the policy covering trainees reference the placement school's safeguarding policy?
2. How are you going to communicate your safeguarding policy to your placement and partnership schools?
3. Have you included a process flow diagram that references how and when a LADO referral is made?
4. When and how is a trainee suspended from a placement following a report of a safeguarding incident? What are the procedures and how will the trainee be informed?
5. If a safeguarding incident is reported, is the trainee suspended from the programme in its entirety or are they able to continue to access training, such as core training or online learning and development? What circumstances are considered when making this decision?
6. What process do you follow when communicating a safeguarding concern to the placement school?
7. Are your thresholds for readmittance to a programme/placement dependent on outcomes of LADO recommendations or do they differ? How are these decisions reached and communicated to the trainee? How would an appeal be managed?
8. What information concerning safeguarding incidents are you going to record on a trainee's file and how are you going to include these on employment references? Do you need to report the information in any other way? What are the procedures?

### **Complaints and grievance**

1. Are grounds for the submission of a complaint clearly outlined and made available to all in the partnership?
2. How have you defined the difference between a complaint and a grievance?
3. What is the timeline for handling complaints? Is this reasonable and practicable in terms of the response time by the organisation and for all parties to present information?
4. Who is responsible for the investigation and resolution of complaints?
5. How are complaints or grievances escalated if the complainant is unhappy with the resolution? How do you ensure there is sufficient separation of involvement at different levels of leadership to allow this to take place?
6. What sort of representation will you allow within the policy by unions or other advocates, and at what stages?

### **Consent and assent (research)**

1. What is the purpose of gaining consent and assent?
2. How are ethical considerations reflected in your policy?
3. How have you defined "informed consent" within your policy?

4. Do you require a written record of “informed consent” or is oral consent enough? How will you allow scope for a trainee to withdraw consent?
5. Are there any cases where implied consent can be assumed through participation in voluntary surveys?
6. Does any of the research data collected fall under the remit of GDPR regulations and the Data Protection Act (2018)?

### **Critical incident plan**

1. What is defined as a critical incident?
2. What is the purpose of the plan? (For example, business continuity, incident response or both.)
3. What are the core and secondary functions identified in the plan?
4. What is the planned recovery time for the core functions covered by the plan?
5. Who is going to “own” the plan and how will it be reviewed?
6. Within the plan, how will you be able to broker and manage the external resources needed to recover your core functions? Over what time scale can these external resources be depended upon?

### **Data protection (GDPR), including retention schedules and sharing procedures**

1. Have you read the DfE’s [Data protection in schools](#) guidance?
2. How are you ensuring data security on site?
3. How are you ensuring data security off site and for those who are working remotely?
4. How long are you retaining data and what is your justification for doing so?
5. Have you considered registering with the ICO?
6. Is your privacy notice clearly displayed on your website?
7. Have you reviewed which members of staff need access to specific data and put appropriate measures in place for staff who do not need access to specific data?
8. Have the trainees received training on their responsibilities under GDPR?
9. What arrangements do placement schools have in place for trainees to access registers and pupil data?
10. How are you going to share trainee data with placement schools?
11. Your trainees are data subjects within your organisation; what rights do they have within your policy to data and information held on them?
12. Have you gained consent from the trainees to allow you to share final assessment information with employers in preparation for the start of the induction process?
13. What are the procedures if a data breach occurs?

### **Discipline, conduct and appeals (to include academic)**

1. Do the trainee’s sign a professional code of conduct?
2. Does this code of conduct also apply to mentors and other training staff?
3. Have you defined what constitutes misconduct and gross misconduct in relation to trainee behaviour?
4. When does repeated misconduct become gross misconduct?
5. Who makes the decision as to what constitutes misconduct or gross misconduct?
6. What is the process and timeline for lodging an appeal against a decision that someone has committed misconduct or gross misconduct?
7. Does missing payments for tuition fees constitute misconduct?

8. Does plagiarism or falsifying evidence towards QTS or an academic award constitute misconduct or gross misconduct?

[An example trainee code of conduct is included in Appendix 2.](#)

## Equality, diversity and inclusion

1. Have you defined what constitutes discrimination, harassment and victimisation within the context of your training provision?
2. What practical steps are you taking to ensure that you do not consciously or unconsciously show any actual or perceived bias towards or against any identified group or characteristic?
3. Have you ensured that sufficient protections are in place for all nine protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation)?
4. What processes do you have in place for anyone to raise a concern under equality, diversity and inclusion?
5. Have you included training for the trainees on equality, diversity and inclusion?
6. How do you ensure your central team are trained and prepared to address matters of equality, diversity and inclusion?
7. How do you address issues which arise in placement schools relating to equality, diversity and inclusion?
8. Have you ensured alignment between your equality, diversity and inclusion policy and your recruitment policy?
9. Within the intent of your policy, have you described the sort of workplace and study environment that you want to achieve through the adoption of the policy?
10. Have you identified who is the named person responsible for the implementation and monitoring of the policy?
11. What support is in place for learners with SEND and/or mental health issues?
12. Does your policy consider the SEND Code of Practice for those who have Education, Health and Care (EHC) Plans?

See further guidance from [ACAS](#).

## Harassment and bullying

1. What is defined as harassment and bullying within your policy?
2. How does this policy relate to your whistleblowing policy as per guidance on [whistleblowing](#)?
3. Are you going to include and define harassment related to the nine protected characteristics (e.g. racial harassment, sexual harassment, etc.) within this policy or have separate policies?
4. How does a harassment policy relate to your misconduct and/or gross misconduct policy?
5. How is 'workplace' bullying during a placement included within this policy?
6. How will you distinguish between a placement school's 'typical' expectations and harassment and/or bullying? What is deemed as reasonable behaviour within the policy (around workload, for example)?

## Health and safety

1. Who is responsible for the health and safety of trainees while in your direct supervision on your training sites and while on placements?
2. Who owns the health and safety audit for your organisation?
3. What is the reporting process for concerns over health and safety?

4. How is your health and safety policy shared with employees and trainees?
5. What is the statement of intent for your policy?
6. What are the practical arrangements that you have in place to manage any risks to the health and safety of individuals? How are these shared with all relevant parties?
7. Who is responsible for ensuring that workload has been considered for those on employment-based routes?

## Internet usage

1. If you provide free Wi-Fi access in your training rooms, how are you going to ensure that this is used for fit and proper purposes?
2. Who is covered within the scope of this policy?
3. How are you going to monitor internet traffic through your system?
4. Have you defined what is unacceptable usage?
5. What are the consequences for anyone who breaks the policy?

## Marking (See also [assessment](#))

1. Have you defined the purpose of any assessment of trainee work?
2. Is the marking purpose and the assessment criteria clearly communicated to the trainees and assessors?
3. How are you going to ensure fairness and comparability of marking across different assessors?
4. How are you going to quality assure marking? For example, are there second markers for all assignments or are samples moderated?
5. Do you have a policy for submission and possible penalisation of pieces of work submitted late?
6. Do you maintain a right for trainees to have work remarked within your policy? Who has the final say if you are working in partnership with a HEI?

## Payment of fees

1. What are your published terms of business for payment of fees?
2. How many times do you remind a trainee of overdue payments before you pursue legal means?
3. At what point do you decide that continued late payment or non-payment of fees constitutes misconduct or gross misconduct?
4. What methods of fee payment do you accept?
5. If a trainee withdraws from the programme, how will you handle unpaid fees or claims for refunds?
6. How will hardship be considered and funded?

## Quality assurance

1. What is the purpose of the policy? Why are you undertaking quality assurance?
2. What are you trying to measure or assess? Is it the impact of policy and procedures?
3. Who owns the quality assurance process? Who is the audience for your findings?
4. Who is undertaking the quality assurance processes? Is it someone external to the ITT Director? What are the procedures for selecting appropriate External Moderators and/or External Examiners to quality assure practices?
5. Who is going to make an objective assessment of the quality assurance findings?
6. How is the quality assurance process going to feed into your improvement planning?

## Recruitment and selection of trainees and schools, including schools going into a category

1. Beyond the basic eligibility criteria for entry in to training, what qualities do you look for in trainees?
2. What criteria do you use when selecting placement schools?
3. Who do you meet when you are looking to engage with a new placement school?
4. When you engage with potential new placement schools, what risk assessments do you complete prior to agreeing a partnership arrangement?
5. Do you check the media profile of potential trainees and schools?
6. If a school goes into a category following an Ofsted inspection, what are the risk assessment processes that you undertake? What criteria determines whether you are going to continue working with the school?
7. If a school goes into a category mid placement, who undertakes the risk assessment process? What support are you going to put in place for the trainee and the placement mentor?

## Social media

1. Do you have a social media strategy in place?
2. Who has the access and authority to post to different social media platforms?
3. What is the agreed range of topics or content that is created or shared across your social media platforms?
4. Who monitors responses to different social media platforms?
5. Do you have response guidelines in place?
6. Are staff aware of your social media policy?
7. Who monitors and reports on social media engagement and to whom?

## Staffing, including staff complaints and discipline

1. Does everyone within your organisation know who they report to and who they are responsible for?
2. Who has overall responsibility for Human Resource Management within your organisation?
3. Who is responsible for the CPD of everyone in your organisation?
4. Who makes recruitment and appointment decisions?
5. How is the process for staff wishing to make complaints formulated and disseminated to all members of staff?

## Well-being (both trainees and staff)

1. Who is responsible for well-being within your organisation?
2. What are the biggest pressures upon your trainees and staff?
3. Who is monitoring the impact of the expected workload on your trainees and staff?
4. Is well-being monitoring included in your strategic plan?
5. What is being done to ensure that workloads are regularly reviewed and addressed?
6. Is there a commitment to work smarter rather than harder within each process that happens within your organisation?
7. Who is monitoring the ITT Director's well-being? Who is coaching the Director?

## Whistleblowing (See also [harassment and bullying](#))

1. What is the purpose of this policy?

2. How is the policy going to allow genuine concerns about any aspect of the work of your organisation to be heard at the highest levels?
3. How will anonymity for whistleblowers be secured if they want to request this?
4. How are you going to protect whistleblowers from intimidation and pressure from co-workers or their dependants?
5. How are you going to handle whistleblowing reports that are for personal gain or are malicious? How is this going to link to your discipline policy?

See [ACAS guidance](#) for further information.

## Appendix 1: Example Absence Policy

This policy aims to enable a provider to exercise its duty of care and responsibilities in relation to ensuring that its trainees pursue their studies with diligence and avail themselves of the educational opportunities made available. It recognises that in such an intensive, one-year course absence, for whatever reason, leads to missed learning opportunities which may impact on the ability to provide evidence relating to the successful demonstration of the Teachers' Standards at the end of the course. It is, therefore, expected that a trainee will be regular and punctual in attendance at all centre and school-based sessions prescribed by the course.

This policy encompasses, with minor adaptations, approaches to the management of absence commonly used in the teaching profession as a whole.

### 1. Notification of absence

- 1.1 The contact for all matters relating to absence is [name].
- 1.2 A trainee will, before the course commences, provide the contact details for a named representative who will contact, or can be contacted by, the provider, in relation to the trainee's absence from the course.
- 1.3 A trainee will notify the provider of any absence from the course, whether the absence relates to school placement or central studies, no later than [time] on the first day of any period of absence. If, by that time, the provider has not been informed of an absence, the provider will contact the named representative to confirm the safety of the trainee and ascertain why they are not in attendance.
- 1.4 If after ten working days the provider is unable to contact the trainee or the named representative, the provider will invoke a suspension of studies, informing Student Finance England (SFE) through a Change of Circumstances (COC) submission should one be required. This may have an impact on any maintenance loans and bursaries that have been arranged. If there is no contact in the following ten working days, the trainee will be deemed to have withdrawn from the course and the relevant authorities will be informed.

### 2. Sickness absence

#### 2.1 Self-certificated absence

- 2.1.1 For absences of five days or less, a trainee will be required to complete the self-certification of absence form obtainable from the provider.
- 2.1.2 There is a limit for self-certification of six days within the course as a whole.

#### 2.2 Medically stated sickness

- 2.2.1 If a trainee is absent for more than five days, a medical certificate or statement signed by a doctor must be sent to the provider as soon as is practical.
- 2.2.2 If the trainee remains ill when the note expires, further medical evidence will be required.
- 2.2.3 If the absence continues for a prolonged period (more than 15 working days) or a date for the return to study exceeds 15 working days from the beginning of the absence, the provider will notify the trainee in writing that it is suspending their study from that 15 day point. If the trainee is in receipt of finance from Student Finance England (SFE), a Change of Circumstances form (COC) will be submitted to SFE by the provider suspending studies on medical grounds effective from that date.
- 2.2.4 If a trainee is subject to an ongoing illness, they should submit a form for mitigation

together with a medical certificate which explains the extent of the illness and the likely effect on their progress through the course before the 15 working day deadline. The situation will be reviewed by the provider to determine whether the trainee should be considered for deferral on medical grounds. The provider reserves the right to undertake a management referral through their occupational health provider in these circumstances.

## 2.3 Convalescence

- 2.3.1 The nature of the course does not easily allow for light duties or other ways of reducing the workload. However, the provider will ensure that on return to the course a trainee has a few days' respite to become fully fit before carrying out important assessments.
- 2.3.2 A trainee returning to course after an extended period of absence may be required to submit to a medical examination by Occupational Health professionals to determine whether and what staged return to work should be implemented.

## 3. Medical appointments

- 3.1 A trainee should inform the provider of any appointments for which they need to take leave, being prepared to offer further evidence if requested. The difficulty of obtaining GP and hospital appointments is acknowledged and these will be honoured wherever possible though a trainee should attempt to ensure follow up appointments do not impact unnecessarily on attendance on the course.
- 3.2 Other routine medical appointments should not be made during the working day.

## 4. Leave of absence

- 4.1 Leave of absence for other reasons may be granted by the Accounting Officer acting on behalf of the provider.
- 4.2 For absences longer than two consecutive days, or for a cumulative total of more than five days, the request will require the additional approval of the Accounting Officer. It is expected that an application will be made for leave of absence, in writing, using the agreed proforma, at least two working days before the absence occurs.
- 4.3 In the case of absence included in private and personal or compassionate categories, a completed proforma should be submitted to the provider on the return to study.
- 4.4 The following outlines the rationale for decisions relating to common requests for leave of absence. They should not be seen as an exhaustive list but serve as an indication as to how leave of absence decisions will be expedited.
- 4.5 Graduation ceremonies: Absence of one day to attend a graduation ceremony for a first degree will be granted. Any requests for travelling time associated with this would not be expected to exceed half a day in total.
- 4.6 Interviews: All reasonable requests will be honoured. Decisions relating to absence for interviews abroad or in places involving extra days for travel will be limited to a cumulative maximum of three working days in the year.
- 4.7 Visits to schools before application/interview: Given the open-ended nature of these absences and the significant demands of the course, leave of absence will not be granted for these visits. In refusing the application, the provider will, if requested by the trainee, contact the school in question, informing them both of the trainee's expression of interest in attending and the rationale for the refusal of the application.
- 4.8 Visits to schools prior to employment: One day will be granted before the end of the final teaching experience. A further day may be granted after this date and before the course

ends. Additional days requested by the school employing the trainee after the course may be granted at the discretion of the provider.

## 5. Compassionate leave

- 5.1 In the event of such emergencies as bereavement, serious accident or illness of an immediate family member/dependant, up to three working days will be allowed for the death of a father, mother, son, daughter, brother or sister and up to five working days leave on the death of a husband, wife or partner.
- 5.2 Requests for additional compassionate leave, or in the case of a cumulative total of more than ten working days, will be referred to the Accounting Officer.

## 6. Private and personal

- 6.1 A maximum of two days at any one time will be granted for the purposes of urgent and unforeseen personal business which does not come under the scope of compassionate leave or to fulfil an important and significant personal commitment which cannot be undertaken at any other time.
- 6.2 Statutory leave of absence up to a cumulative total of five working days during the course will be allowed. However, given the intense nature of the course, trainees will be advised that membership of bodies requiring such absence should be reviewed.
- 6.3 Holidays: The intensive nature of the course means that holidays, including those booked before commencement of the course, should not be undertaken.
- 6.4 If additional leave is granted, for example to attend a family wedding, it should be noted that SFE will be informed and an adjustment to any maintenance loans may follow.

## Appendix 2: Example Trainee Code of Conduct

The Trainee will be expected to abide by the following code of conduct: - The Trainee Code of Conduct.

I understand that as successful completion of this course leads to admission to a professional body, I am required, during my studies, to adhere to the expectations of conduct endorsed by the teaching profession. I understand that breaches of these expectations may lead to disciplinary action including my exclusion from the course and/or the inability of [provider] to provide me with a supportive professional reference. I also understand that I am required to complete a health assessment form which will be forwarded to the [single legal entity's] Occupational Health Service and where necessary comply with requirements for further discussion/examination as appropriate.

I undertake to behave in a manner appropriate to my position as a trainee teacher and understand that behaviour including, for example, dishonesty, indecency, harassment, bullying, violence, abuse of drugs or alcohol will lead to disciplinary action, which may include consideration of any criminal conviction, whether or not the offence(s) are directly related to my studies. I further undertake to inform the Course Director, without delay, should I be subject to a criminal conviction or caution after the submission of my application for DBS Enhanced Disclosure. I understand that a criminal conviction or caution may lead to my suspension or expulsion from some or all aspects of the course and that this may lead to the need for my studies to be extended or curtailed. I also understand that the Rehabilitation of Offenders Act (1975) does not apply to the teaching profession and that should I be subject to a criminal conviction or caution it will never be considered "spent". I recognise that in the course of my studies I will be placed in a position of trust and that as such I am subject to the requirements of the Sexual Offences (Amendment) Act 2000. I understand that any DBS clearance obtained by the [provider] relates to my position on its course and does not guarantee that I will be cleared fit for future employment as a teacher.

I will at all times treat children, colleagues, staff and any other members of the [provider] with due respect and conduct myself in a professional, honest, decent and courteous manner. I will use language appropriate to the situation and people involved. I will accept my responsibility to ensure that children are treated with respect and free from abuse. In schools I will always work in a place which is accessible to others and in which I can be observed working. I will ensure I know and maintain at all times the school policy on control, rewards and punishment, recognising that it is illegal to use physical means of punishment. I will not take or agree to meet children outside school premises without another responsible adult present. I will not make unnecessary physical contact with children. I will report any suspicion that a child is being abused to the school's named person (usually the headteacher). I will commit to promoting equality of opportunity, including gender, race and culture, in order to work with children, staff and parents appropriately. I will be mindful of the difficulties some groups may face and ensure personal prejudices and stereotypical views do not influence my judgements or actions.

I understand that I will have access to confidential personal information and that I am required to comply with the Data Protection and Child Protection legislation. I understand that I may not disclose this information to any third party, other than in accordance with the conventions regarding use of personal information for use in research for the purposes of completing assignments or in accordance with the law and code of ethics agreed for the assignment. Any personal information used in assignments or tasks will have all means of identifying the subject removed. I will take particular care to ensure the safety of any data relating to a third party whilst in transit and will be careful to ensure any such data held on a mobile device is uploaded to the secure storage made available and then deleted from the mobile device. I will at all times ensure

that any photographs or digital images are acquired under the terms of the policy of the relevant school.

I will ensure that I maintain, both in the centre and in schools, a standard of dress that will be perceived as professional by such persons as I may encounter in the pursuit of my studies.

The content of the course meets the requirements of Qualified Teacher Status and (if relevant) the Postgraduate Certificate in Education awarded by [institution] and I will pursue my studies with due diligence, ensuring that I avail myself of the educational opportunities made available. I will take responsibility for my own learning through punctual attendance at lectures, workshops and periods of school experience and through being suitably prepared for them. I will notify the [provider], in accordance with the guidelines issued, if I am to be absent from any part of the course, due to sickness or other reasons, and I will make up the lost learning opportunities. I will immediately inform [provider] if I am suffering from an infectious disease such as chicken pox, German measles (rubella), impetigo, measles, scarlet fever and slapped cheek disease, (Parvovirus). I will not disrupt the delivery of teaching or the learning experience of fellow trainee teachers and will not jeopardise the health and safety of those involved, both at the centre and in schools.

I understand that attendance at professional development sessions is compulsory and I will ensure that I attend each session. I undertake to complete the appropriate absence forms and to make up work missed through illness or other circumstances covered within the [provider's] Absence Policy. I will be prepared for sessions to start promptly and ensure I have made adequate arrangements to be in on time. I will not leave a session once it has started without seeking permission from the tutor. I undertake to be scrupulous about signing in and out of the building and signing session registers. I understand that records of attendance and lateness will be kept by the [provider] and may be used as evidence when awarding qualifications or writing references. I will submit work in accordance with the instructions in the [handbook].

I will have due regard to the safety of pupils at all times as outlined by Section 7 of the Health and Safety at Work Act (1974) and the extension of the regulations to trainee teachers for employment (1994) which place a duty on me to take reasonable care for the health and safety of myself and anyone else who may be affected by my acts or omissions, and to co-operate as necessary in full compliance with the obligations imposed on my provider by health and safety legislation.

I understand that if I behave dishonestly during the assessment process (including plagiarism or other forms of cheating) or in relation to my attendance or the attendance of others by falsifying signatures or other means I will be subject to disciplinary action which may result in the termination of my training.