



# Phoenix College

## Accreditation Policy

February 2025

Updated February 2025 – Review February 2025

Phoenix Autism Trust (PAT) – A Pathway Towards Independence and Supported Employment  
Registered Company no. 09615159 Registered Charity no. 1172227  
Registered Office: 49 Bow Road, E3 2AD

## **Contents**

1. Purpose
2. Scope of policy
3. Policy access and review
4. Fairer assessment principles
5. Staff development
6. Equal opportunities and diversity
7. Learner recruitment, registration and certification policy
8. Recognition of Prior Learning (RPL) and Credit Accumulation Transfer (CAT)
9. Withdrawal of students or qualifications from OPEN AWARDS
10. Special Considerations and Reasonable Adjustments
11. Plagiarism
12. Candidate Malpractice Procedure
13. Staff Malpractice and Maladministration Procedure
14. Appeals
15. Complaints
16. Conflict of interests
17. Internal Moderation Policy for OPEN AWARDS Qualifications

### **1. Purpose**

The purpose of this policy is to provide all stakeholders including staff, students, trustees, parents/carers, examination boards and partners with an understanding of the ethical framework which underpins our accreditation systems, the procedures through which it operates and supports compliance with Open Awards (our accreditation provider).

### **2. Scope of the policy**

The policy aims to address key aspects of the work that we do with Open Awards and applies to all staff, students and partners involved in the accreditation process at Phoenix College. It should be read in conjunction with other College policies:

- Equality and diversity
- Health and Safety
- Data Protection
- Risk assessment and off-site visits
- Admissions
- Whistleblowing
- Complaints and Compliments

### **3. Policy access and review**

Students are made aware of the existence of this policy and have open access to it. It can be found in the staff shared area here: J:\Policies\Current Policies. A copy can also be found on our website: [www.phoenixcollege.london](http://www.phoenixcollege.london)

This policy is reviewed annually and may be revised in response to feedback from students, tutors and external organisations.

### **4. Fair assessment principles**

Our accreditation policy is based on the following principles:

- We aim to provide a variety of qualifications which provide all students with the opportunity to achieve their full potential by the most appropriate and direct route.
- Is based on the concepts of equality, diversity, clarity, consistency, integrity and openness.
- We will endeavour to ensure that the assessment processes are implemented in a way which is fair and non-discriminatory.

What students can expect from us:

- We aim to ensure that all assessment of work is carried out fairly and in keeping with the awarding body's requirements.
- All portfolio-based work will be assessed fairly against the qualification standards and teachers involved will be fully trained.
- Internal assessments will be carried out fairly and according to awarding body instructions.
- Externally marked tests and exams will be according to the requirements of the awarding body.

Students can also expect:

- To be fully inducted onto a new course and given information that can be shared with parents and carers.
- Learning outcomes, performance criteria and other significant elements of learning and assessment to be made clear at the outset of the course and when assignments are set.
- To be given appropriate assessment opportunities during the course with feedback provided on the quality of the work.
- All work to be marked within two weeks of submission by the student.
- Where equivalents and exemptions can be applied, we will ensure this is pursued with the relevant awarding body.

### **5. Staff development**

This section sets out the College's commitment, policy and practice towards staff development.

**Definition:**

Staff development refers to the development of the individual's potential and career in terms of knowledge, skills, personal abilities, competencies and understanding. It embraces a wide range of learning experiences both within and outside the workplace and is a continuing process.

**Aims of staff development:**

- To achieve agreed strategic, operational, team and individual objectives.
- To help individual members of staff to acquire knowledge and skills which will enable them to fulfil their current responsibilities more effectively
- To support staff in responding positively to change.
- To extend staff's range of performance.
- To support the development of teamwork.
- To support the continuous development of skills and access to qualifications which will aid future career development.
- To identify and develop staff potential.
- To increase job satisfaction, motivation and initiative

**Access to staff development opportunities:**

All staff can access personalised training opportunities through the annual appraisal process. Appraisal objectives are agreed in October and reviewed in February and June. Through this process staff are required to identify and agree training needed to meet those objectives and support their development.

The College also identifies college-wide priorities through its quality improvement plan which enable it to better meet the needs of students. These include regular training for staff in Team Teach, SCERTS, 5P approaches to behaviour, autism and communication and interaction, accreditation processes and requirements and training for systematic instruction led by both specialist providers and senior leaders.

Staff development is also supported by weekly class liaison meetings. These sessions provide opportunities for the review of training with input from speech and language specialist and therapists. They also support staff in planning for and responding to individual student needs.

## **6. Equal opportunities and diversity**

This policy reflects the duty of all educational organisations to have updated and published their Equal Opportunities and Diversity Policy, which adheres to the Equality Act 2010, by April 2012. It sits within our wider College equal opportunities and diversity policy. Below is a generic policy and intended only as an example. It is the centre's responsibility to ensure that any policy produced is modified to suit their individual characteristics and needs.

This policy describes the way in which Phoenix College will meet the requirements of the Equality Act 2010. This Act replaced all previous equality legislation such as the Race Relations Act, the Disability Discrimination Act and the Sex Discrimination Act. The policy will be applied to all staff and students, as well as any volunteers working in the College.

### **Policy Statement**

Phoenix College will adhere to the requirements of the Equality Act 2010 by not discriminating against students, staff, volunteers or anyone involved in external agencies the organisation may be working with on the grounds of:

- sex, race, disability, religion or belief or sexual orientation.

In addition, there will be no discrimination against:

- pregnant females or new mothers
- staff, students or volunteers undergoing gender re-assignment
- students due to the behaviour of their parents and/or siblings

When recruiting staff, health related questions will not be asked until after a job offer is made, and then, only if it is necessary for the role.

Phoenix College may decide to use the 'Positive Action' clause of the Equality Act 2010, which allows for the setting up of courses specifically for a certain group, such as Afro-Caribbean boys or Roma children. (Previously, this could have been considered discriminatory.)

It is expected that every person in the organisation will make a positive contribution to this policy, namely:

- All staff whether paid or voluntary
- All visitors to Phoenix College
- All students at Phoenix College

In addition, Phoenix College will:

- ensure that the services it provides are accessible to all and endeavour to positively encourage and benefit people from disadvantaged groups
- supply specialist aids and facilities to enable disabled people
- monitor any issues that arise within the organisation and take appropriate action, fully supporting any person in the organisation who is faced with prejudice or discrimination
- undertake an annual evaluation process to ensure that the policy is clear, in keeping with current legislation and being adhered to
- treat seriously any breaches of the policy, regarding them as misconduct which may lead to disciplinary proceedings

## **Complaints Procedure**

### **Stage 1**

Any person who experiences, witnesses or is reasonably led to believe that this Equal Opportunities Policy has not been respected, should immediately bring the situation to the attention of Phoenix College Senior Management Team. The person responsible for this breach will be reminded of the existence and purpose of this policy, and asked to adhere to the policy.

### **Stage 2**

If the person continues behaving in an unacceptable manner, the matter will be referred to the Principal, who will decide the best course of action.

This may result in:

- a warning being issued
- a disciplinary
- a referral to a higher level of authority

### **Stage 3**

The offending person has the right to appeal. He/she can write to the principal. The decision of the Principal will be final.

## **7. Student recruitment, registration and certification policy**

This section aims:

- To ensure that all students are recruited onto courses based on their aspirations, skills and attributes with integrity and professionalism
- To register individual students for the correct programmes within the correct timescale.
- To ensure students are entered for externally assessed units where necessary.
- To claim valid learner certificates by an agreed deadline.
- To ensure that individual learner registration and certificate claims are accurate and secure.

Phoenix College will ensure that:

- Students will be registered within the awarding body requirements.
- Procedures put into place to confirm the accuracy of learner registrations.
- Ensure each learner is aware of their registration status.
- Inform the awarding body of any withdrawals, transfers or changes to learner details.
- Exam information will be distributed to students and staff by the Centre co-ordinator prior to the examination date where appropriate.
- Ensure that certificate claims are made by the deadlines set.

- Keep all certificates secure for three years post certification.

Practice:

- Tutors will look to tailoring the methods of assessment to suit the individual needs of students to make the course accessible.
- The College will ensure that a robust system of registration is in place to ensure that all students are registered on courses in line with examination board's requirements and within deadline.
- Students will be required to provide proof of identification within one week of course start date.
- Assessors must ensure that they are satisfied of learner's identity at each assessment point.
- Tutors will ensure that all registered students/parents will be familiar with Phoenix College policies relating to malpractice, appeals and internal verification and assessment along with the policy on reasonable adjustment and special consideration.
- The College will ensure that the transfer of data between centres is also completed in the event of a learner transferring between centres.
- The College will ensure that all students/parents are aware of their learner status and that withdrawals, transfers or changes to any students' details are kept up-to-date and that examination boards have been notified.
- Course tutors are responsible for the assessment data held by the examination boards is accurate and that they can provide an audit trail of learner assessment and achievement which can be made accessible.
- The College will ensure that timely certificate claims are made and that they are based solely on internally verified records and that these are made to the awarding body. All certificates should be audited to ensure accuracy and completeness.
- The College will ensure that all records are kept safely and securely post certification for recommended periods of time in line with examination board requirements.
- The Centre Co-ordinator should ensure that unit certification takes place for students who have not completed sufficient number of units to receive the full award but can be certificated for the units that they have achieved

## **8. Recognition of Prior Learning (RPL) and Credit Accumulation Transfer (CAT)**

This section aims to set out College procedures with regard to RPL and CAT.

RPL and CAT may be used in a number of scenarios including:

- Where a student joins Phoenix College from another specialist college part way through a course.
- Where there has been a change of accreditation provider.

### **Recognition of Prior Learning (RPL)**

RPL may be defined as ‘a method of recognising previous learning or attainment to meet current requirement’ or ‘a method of assessment leading to the award of credit that considers whether students can demonstrate that they can meet the assessment requirements for a unit through knowledge, behaviours, skills and understanding they already possess and so may not need to develop these through a course of learning’.

The RPL process will:

- assess evidence of a learner’s previous achievement against the criteria of a unit. Where evidence only covers one or more criteria additional assessment methods will be used to ensure a safe decision.
- Be carried out by designated, specialist staff.

### **Credit Accumulation Transfer (CAT)**

CAT applies to learning that has been previously certified for a different regulated qualification or from a different Awarding Organisation on the same framework (RQF or QCF) and will prevent a learner from having to unnecessarily repeat previous learning.

Phoenix College will adhere to Open Awards Guidance relating to RPL and CAT.

## **9. Withdrawal of students or qualifications from Open Awards**

This section identifies the procedure to be followed in the event of a qualification or units being withdrawn, or ceasing to be offered, by the awarding body.

Any qualification withdrawal will be managed with the interests of students foremost. Students will be given sufficient notice for complete qualifications. Advice and guidance on alternative qualifications will be given where necessary.

In the event of short notice given by an awarding body or mid-year procedures for Recognition of Prior Learning will be followed and prior learning will be transferred to an appropriate qualification with an appropriate body

There are a number of reasons why a qualification might be withdrawn by Phoenix College including:

- The qualification no longer meets the needs of the student population.
- The qualification subject matter is no longer relevant.
- Lack of demand for the qualification.
- Lack of funding.

Our withdrawal process is as follows:

#### Stage 1: Decision to withdraw

All current Phoenix College qualifications will be reviewed by the Centre co-ordinator, annually or more frequently if the situation requires.

They will consider entry data, attainment levels, qualification relevance and regulatory changes.

If a decision is made to withdraw a qualification a report outlining the rationale will be developed and signed off by the Principal.

#### Stage 2: Managing the Withdrawal.

Upon the decision being made to withdraw a qualification, a withdrawal plan will be formulated.

The plan will comply with any requirements as stated by Ofqual and may include arrangement for learnings to complete programmes of work at an alternative centre.

The plan will:

- Specify how the interests of learners in relation to the qualification will be protected.
- Detail how the withdrawal will be communicated to the awarding organisation, regulatory authorities, and students providing the details of all deadlines including the last date for certification.

### **10. Special Considerations and Reasonable Adjustments**

This section aims to set out the steps that will be followed in making special considerations and reasonable adjustments.

Phoenix College is an independent specialist college for young people, aged 19-25, with autism and learning disabilities, all of whom have an Education Health Care Plan (EHCP). All students have Complex Learning Difficulties and Disabilities which includes a diagnosis of autism.

All College staff are committed to the provision of access arrangements for our students in line with our equal opportunities and diversity policy. Students are supported on a day-to-day basis by college staff. The nature of support required by each student, on a daily basis, is set out in their Independent Learning Plan (ILP), which is based on their EHCP. A candidate's access requirements will be decided by the Centre co-ordinator, in line with their ILP, who will provide details of level of need and the normal way of working for a learner as requested by Open Awards.

Phoenix College will adhere to OPEN AWARDS guidance for access arrangements and reasonable adjustments.

### **11. Plagiarism**

This section aims to set out the College policy and procedures with regard to plagiarism.

Plagiarism can be defined as

“The reproduction or appropriation of someone else's work without proper attribution; passing off as one's own the work of someone else.”

A fair assessment of a student's work can only be made if that work is entirely the student's own. Plagiarism will therefore not be tolerated by the College.

All students can expect an awarding body to be informed if:

- They are found guilty of copying, giving or sharing information or answers, unless part of a joint project.
- They copy another student's answers during an assessment.
- Collude with others to cheat and deceive.
- Take someone else's work, ideas or images and claim it as their own.

Any allegations of plagiarism will lead to a full investigation led by the examinations officer, which will follow the guidance of the relevant awarding body.

If a student feels that they have been wrongly accused of plagiarism they should be referred to the Appeals Policy.

## **12. Candidate Malpractice Procedure**

This procedure sets out to define the procedures to be followed in the event of a dispute or allegation in the assessment of internally marked qualifications and examinations.

### **Examples of candidate malpractice:**

Attempted or actual malpractice activity will not be tolerated. The following are examples of malpractice by candidates with regards to portfolio-based qualifications. This list is not exhaustive:

- Plagiarism: the copying and passing off as the candidate's own work, the whole or part of another person's work.
- Collusion: working collaboratively with other students to produce work that is submitted as the candidate's own work.
- Failing to abide by the instructions of an assessor – This may refer to the use of resources which the candidate has been specifically told not to use.
- The alteration of any results document.

If a teacher suspects a candidate of malpractice, the candidate will be informed, and the allegations will be explained. The candidate will have the opportunity to give their side of the story before any final decision is made. If the candidate accepts that malpractice has occurred, he/she will be given the

opportunity to repeat the assignment. If found guilty of malpractice following an investigation, the teacher may decide to re-mark previous assignments and these could also be rejected if similar concerns are identified.

If a teacher suspects a candidate of malpractice during an examination, the candidate will be informed, and the allegations will be explained. The candidate will have the opportunity to give their side of the story before any final decision is made. If the candidate is found guilty of malpractice, the Awarding Body will be informed and the candidate's examination paper will be withdrawn. It is unlikely that the candidate will have the opportunity to repeat the examination.

If a malpractice decision is made, which the candidate feels is unfair, the candidate has the right to appeal in line with the Appeals Policy

### **13. Staff Malpractice and Maladministration Procedure**

This policy sets out to define the procedures to be followed in the event of any dispute or allegation regarding staff malpractice in the assessment of internally marked qualification and also regarding examinations invigilated at the College and marked externally. This also covers maladministration.

#### **Examples of Malpractice**

Attempted or actual malpractice activity will not be tolerated. The following are examples of malpractice by staff with regards to portfolio-based qualifications. This list is not exhaustive:

- Tampering with candidates work prior to external moderation/verification.
- Assisting candidates with the production of work outside of the awarding body guidance.
- Fabricating assessment and/or internal verification records or authentication statements.

The following are examples of malpractice by staff with regard to examinations:

- Assisting candidates with exam questions outside of the awarding body guidance.
- Allowing candidates to talk, use a mobile phone or go to the toilet unsupervised.
- Tampering with scripts prior to external marking taking place.

Investigations into allegations regarding Open Awards qualifications will be coordinated by the Examinations Officer who will ensure the initial investigation, is carried out within ten working days. The person responsible for coordinating the investigation will depend on the qualification being investigated. The investigation will involve establishing the full facts and circumstances of any alleged malpractice. It should not be assumed that because an allegation has been made, it is true. Where appropriate, the staff member concerned and any potential witnesses will be interviewed and their version of events recorded on paper.

The member of staff will be:

- informed in writing of the allegation made against them.

- Informed what evidence there is to support the allegation.
- Informed of the possible consequences, should malpractice be proven.
- Given the opportunity to consider their response to the allegations.
- Given the opportunity to submit a written statement.
- Given the opportunity to seek advice (as necessary) and to provide a supplementary statement (if required).
- Informed of the applicable appeals procedure, should a decision be made against them.
- Informed of the possibility that information relating to a serious case of malpractice will be shared with the relevant awarding body and may be shared with other awarding bodies, the regulators Ofqual, the police and/or professional bodies including the GTC.

If work is submitted for moderation/verification or for marking which not the candidate's own work is, the awarding body may not be able to give that candidate a result.

### **Staff Malpractice Sanctions**

Where a member of staff is found guilty of malpractice, Phoenix College may impose the following sanctions:

- 1) **Written warning:** Issue the member of staff with a written warning stating that if the offence is repeated within a set period of time, further specified sanctions will be applied.
- 2) **Training:** Require the member of staff, as a condition of future involvement in both internal and external assessments to undertake specific training or mentoring, within a particular period of time, including a review process at the end of the training.
- 3) **Special conditions:** Impose special conditions on the future involvement in assessments by the member of staff.
- 4) **Suspension:** Bar the member of staff in all involvement in the administration of assessments for a set period of time.
- 5) **Dismissal:** Should the degree of malpractice be deemed gross professional misconduct; the member of staff could face dismissal from his/her post.

The member of staff may appeal against sanctions imposed on them. Appeals will be conducted in line with the organisations Appeals Policy.

### **Maladministration**

To mitigate against errors in administration, or maladministration, the entry record will be created by the Office Administrator, in partnership with the Centre co-ordinator before and after entry of candidates to any specified award.

In the event of an error occurring, the awarding body will be notified immediately.

## **14. Appeals**

This section aims to set out the steps that should be followed by the students in making an appeal about results and the College in reviewing an appeal.

All students at Phoenix College have the right to make an appeal regarding the qualifications they are undertaking.

If any student wishes to appeal a decision, they should use the following procedure:

1. If possible, speak to the member of staff responsible for teaching the qualification in the first instance about the reason they wish to appeal.
2. The member of staff has a responsibility to explain to the candidate why he/she received the qualification.
3. If the student is not satisfied with the explanation, the piece of work will be reviewed by another member of staff also involved with that qualification.
4. The student will be informed of the outcome by letter.
5. If the student wants to continue the appeal, he/she needs to contact the Centre co-ordinator, who will provide the student with information about the appeals procedure for the relevant awarding body and explain what is involved. The Centre co-ordinator will assist with the completion of any forms and will correspond with the awarding body on behalf of the student.
6. Please note: a student must have the support of the centre to be able to appeal against a result.

## **15. Complaints**

This procedure relates to dissatisfaction expressed by our students with regard to the accreditation of their learning at Phoenix College.

Phoenix College is committed to providing the highest standard of teaching and learning for our students. If a student feels that we have not met their expectations, we would want to know as soon as possible to stop this from happening again.

If a student has a complaint, they can take the following actions:

1. In the first instance speak to the member of staff responsible for teaching the qualification, explaining the nature of their complaint and anybody else who have been affected.
2. If the complaint remains unresolved, speak with the Centre co-ordinator explaining the nature of the complaint, anybody else who has been affected and if they have already spoken to somebody about this.

Phoenix College will aim to resolve a complaint as quickly as possible. Where this is not possible, we will investigate the complaint and aim to resolve it as soon as possible, keeping the student updated along the way.

We aim to respond to complaints within five working days of receipt. If there are exceptional circumstances we may take longer to the complexity of a complaint. If this is the case, we will inform the complainant.

Once the complaint has been investigated fully we will explain the outcome to the student, along with any next steps.

If the student is not satisfied with how their complaint has been dealt with they can escalate it in line with College Complaints and Compliments Policy.

If they are still not happy with the final response they can refer the complaint to the awarding body and the regulators

In writing: England Ofqual, Complaints Ofqual, Earlsdon Park, 53055 Butts Road, Coventry CV1 3BH.

By telephone: 0300 303 222

By email: [complaints@ofqual.gov.uk](mailto:complaints@ofqual.gov.uk)

## **16. Conflict of interests**

All learning support mentors, teachers, assessors and internal moderators of Phoenix College will strive to avoid any conflict of interest between the interests of Phoenix College and Open Awards Awarding Body 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.

The purposes of this policy is to protect the integrity of Phoenix College and Open Awards decision-making process, to enable our students, parents & carers to have confidence in our integrity, and to protect the integrity and reputation of teachers, assessors and internal moderators.

Examples of conflicts of interest include:

- A student who is related to a member of staff.
- A member of staff who is also on the committee of Awarding Bodies.

Annually, all staff make a full, written disclosure of interests, such as relationships, and posts held, that could potentially result in a conflict of interest related to accreditation and awarding bodies. This written disclosure will be kept on file and will be updated as appropriate.

In the course of meetings or activities, staff will disclose any interests in a transaction or decision where there may be a conflict between Phoenix College's best interests; staff's best interests or a conflict between the best interests of Phoenix College and Open Awards Awarding Body that staff is involved with.

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

This policy is meant to supplement good judgment, and staff should respect its spirit

Date adopted: January 2021

## 17. Internal Moderation Policy for Open Awards Qualifications

Internal moderation is a key process carried out by tutors at Phoenix College, throughout the delivery of the Open Awards units & qualifications. This process ensures that assessment methods are consistent across all Tutors/Assessors in the College and that outcomes are fair to all students.

Evidence that thorough and robust internal moderation has taken place is required as part of the external moderation and for audit purposes. It is therefore the responsibility of all staff to participate in the moderation process by keeping the necessary records, attending relevant meetings and submitting marked candidate work as requested.

All assessment evidence that has been internally moderated must be kept on site until after the external moderation. The work remains the property of the candidate and can be returned to the candidate according to the requirements of the relevant awarding organisation.

The aim of this policy is to ensure the following:

- Internal moderation practices are valid and reliable, cover all tutors/assessors and meet the requirements of the awarding organisation.
- The internal moderation procedures are fair and open
- Accurate and detailed records are kept of internal moderation decisions.

Phoenix College will ensure the following:

- **All assessment activities are valid, appropriate and fit for purpose.**
  - Curriculum maps, schemes of work and assessment activities are reviewed each term at staff meetings to ensure they are valid, appropriate and fit for purpose before delivery.
- **Apply a strategy that will provide a representative sample across all tutor/assessors**
  - Because of small group sizes at Phoenix College Tutors/assessors are to bring **all** student work/assessment folders to all centre standardisation/moderation meetings.
- **Create a plan of internal moderation in relation to all assessment activities**
  - The Centre coordinator will review evidence of completed student assessment activities throughout the summer term (the term where the college gather accreditation evidence). Tutors/assessors must make student evidence folders available or indicate the folders in the shared area where completed evidence sheets are stored. This includes staff who are working on a temporary agency contract.
- **define, maintain and support effective internal moderation roles, including the provision of training where required.**

- Centre co-ordinator will liaise with Open Awards External Quality Assurers (EQA) to ensure the centre has a full understanding of the qualification requirements. Internal training sessions will be given to staff to ensure they have a basic understanding of
- The structure and content of each qualification
- The resources that have been developed to support the qualifications
- The administration requirements to deliver the qualifications
- **Provide standardised documentation to support internal moderation activity and record-keeping**
  - Staff can access all documentation to support internal moderation in the staff shared area: J:\Quality of Education\OPEN AWARDS
- **Ensure that feedback and outcomes of internal and external moderation support future development of good practice**
  - The centre coordinator will provide written feedback of internal moderation to all relevant staff no later than 2 weeks after internal moderation meetings.
- **Carry out an annual evaluation and review of internal moderation policy and procedures**
  - The centre coordinator will evaluate and review internal moderation policy and procedures annually and inform all staff involved of any changes or developments.