

# INSPECTION REPORT

## Chamber Training Services

18 June 2001



ADULT LEARNING  
INSPECTORATE

## Grading

Inspectors use a seven-point scale to summarise their judgements about the quality of learning sessions. The descriptors for the seven grades are:

- *grade 1 - excellent*
- *grade 2 - very good*
- *grade 3 - good*
- *grade 4 - satisfactory*
- *grade 5 - unsatisfactory*
- *grade 6 - poor*
- *grade 7 - very poor.*

Inspectors use a five-point scale to summarise their judgements about the quality of provision in occupational/curriculum areas and in New Deal options. The same scale is used to describe the quality of leadership and management, which includes quality assurance and equality of opportunity. The descriptors for the five grades are:

- *grade 1 - outstanding*
- *grade 2 - good*
- *grade 3 - satisfactory*
- *grade 4 - unsatisfactory*
- *grade 5 - very weak.*

The two grading scales relate to each other as follows:

SEVEN-POINT SCALE	FIVE-POINT SCALE
grade 1	grade 1
grade 2	
grade 3	grade 2
grade 4	grade 3
grade 5	grade 4
grade 6	grade 5
grade 7	

## **Adult Learning Inspectorate**

The Adult Learning Inspectorate (ALI) was established under the provisions of the *Learning and Skills Act 2000* to bring the inspection of all aspects of adult learning and work-based training within the remit of a single inspectorate. The ALI is responsible for inspecting a wide range of government-funded learning, including:

- work-based training for all people over 16
- provision in further education colleges for people aged 19 and over
- the University for Industry's *learnirect* provision
- adult and community learning
- training given by the Employment Service under the New Deals.

Inspections are carried out in accordance with the *Common Inspection Framework* by teams of full-time inspectors and part-time associate inspectors who have knowledge of, and experience in, the work which they inspect. All providers are invited to nominate a senior member of their staff to participate in the inspection as a team member.

## **Inadequate provision**

A provider's provision will normally be deemed to be less than adequate where

- one third or more of published grades for occupational/curriculum areas and New Deal options are judged less than satisfactory, or
- leadership and management are judged to be less than satisfactory

The final decision as to whether the provision is inadequate rests with the Chief Inspector of Adult Learning. The overall judgement as to whether the provision is adequate or inadequate is included in the summary section of the inspection report.

## SUMMARY

### The provider

Chamber Training Services (CTS) is the training section of the Lincolnshire Chamber of Commerce. It is based in Lincoln and provides work-based training for young people and NVQ training across seven areas of learning: hairdressing, business administration, retail and customer services, veterinary nursing, manufacturing, health and social care, and engineering. Currently the number of learners totals 51. Of these 23 are hairdressing learners. The remainder are to be found in small numbers in the other areas of learning. These other occupational areas were not inspected as there were too few learners. There are five New Deal clients.

### Overall judgement

The quality of work-based training in hairdressing is unsatisfactory. The leadership and management of Chamber Training Services are unsatisfactory. The overall quality of the provision is not adequate to meet the reasonable needs of learners.

### Work-based learning for young people

Work-based training is very weak in hairdressing. Chamber Training Services currently trains 23 learners who are placed with 19 employers. The training and assessment of learners is subcontracted to a local college. CTS has established a close partnership between employers, learners and the CTS training adviser. However, assessment practices are poor. Basic skills assessments are not used to provide appropriate support for learners who need it. There is some poor co-ordination of on- and off-the-job training. Progress reviews do not include action plans and targets, and fail to promote achievement. There are weak internal verification procedures at the college and poor achievement rates. However, there is some evidence that retention of learners is beginning to improve.

### Leadership and management

The leadership and management of CTS are very weak. For the past two years the organisation has faced a very uncertain future; during this time there has been a lack of clear direction and support from senior management. CTS has developed some good practice for those learners who are trained and assessed by CTS itself, including good monitoring of their NVQ progress. However, this only applies to 11 out of the 51 learners. The management of subcontractors is weak and the arrangements for training and assessing most learners are inadequate. Although CTS has a number of policies and procedures, including an equal opportunities policy, there is no quality assurance framework. There is no comprehensive complaints procedure and induction for learners is inadequate. The promotion and monitoring of equal

opportunities is weak. Management information is collected but is not analysed or evaluated effectively. CTS has no systematic approach towards making improvements in the quality of training, workplace practices and retention and achievement rates. Retention and achievement rates are much the same across all the training including the subcontracted training. Over the last 4 years, an average of 44 per cent of learners left the NVQ training with no qualifications; an average of 26.5 per cent of learners achieved the goals of their individual training plans. The self-assessment report shows that CTS is quite self-critical. However, it did not identify all of the key weaknesses and many of the strengths listed, were no more than normal practice.

## GRADES

Hairdressing & beauty therapy	5
Contributory grades:	
Work-based learning for young people	5

Leadership and management	5
Contributory grades:	
Equality of opportunity	5
Quality assurance	5

## KEY STRENGTHS

- good monitoring of NVQ progress for some learners

## KEY WEAKNESSES

- poor assessment practices in subcontracted training
- inadequate use of data to bring about improvements
- lack of clear leadership from senior management
- poor promotion and monitoring of equal opportunities
- inadequate quality assurance arrangements
- weak management of subcontractors

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### **OTHER IMPROVEMENTS NEEDED**

- better recording of retention data
- equal opportunities training for staff and learners
- wider involvement in self-assessment process

## THE PROVIDER AND ITS CONTEXT

1. Chamber Training Services (CTS) was established in 1983 by Lincoln Incorporated Chamber to provide a service for the members of the Lincolnshire Chamber of Commerce, for local businesses and for unemployed young people. A separate training centre for administration and distribution learners was established in 1990. CTS now offers training in a variety of occupational areas: hairdressing, business administration, retailing and customer services, veterinary nursing, manufacturing, health and social care and engineering. However, numbers have decreased considerably and 23 of CTS's learners are doing hairdressing training. Eighteen of these are undertaking NVQs and there are five foundation modern apprentices. Training in two of the occupational areas is subcontracted to the local further education college and a local private training company. CTS places its learners with 30 employers in the area and 44 of the learners are employed. In the last two years, there has been much uncertainty about the future of CTS and its staff; there was no solution to this problem in sight at the time of inspection. Staff have behaved very professionally during this period despite their own difficulties. No action-planning or improvements based on the self-assessment report have taken place in the last six months.

2. CTS has four full-time staff: three training officers and the training manager. They are managed by the chief executive of the Lincolnshire Chamber; it currently provides training for 23 hairdressing learners. The other 28 learners are undertaking a range of NVQs and modern apprenticeships across the other occupational areas.

3. Training is currently funded through a direct contract with Lincolnshire and Rutland Learning and Skills Council (LSC). Recruitment of young people into education and training is highly competitive: most local secondary schools have sixth forms and Lincoln is the centre for a number of large further education establishments. In 2000, the proportion of school leavers in Lincoln achieving five or more general certificates of secondary education (GCSEs) at grade C and above was 46 per cent, compared with the national average of 49.2 per cent. Unemployment in Lincoln was 3.2 per cent in April 2001, almost the same as the national average of 3.3 per cent. In Lincolnshire just over 1 per cent of the total population is from minority ethnic groups. Recent research conducted by Lincolnshire TEC on behalf of the Equal Opportunity Group found that most minority ethnic school leavers stay on in full-time education and few join modern apprenticeships or national traineeship programmes.

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### THE INSPECTION

4. A team of three inspectors spent 16 days at CTS. Inspectors had previously evaluated CTS's self-assessment report and reviewed data. They interviewed 28 learners, seven CTS staff, 12 supervisors/employers and two subcontractors. They also observed two training sessions and visited 17 work placements. Inspectors examined a range of documents including 25 portfolios, 40 learners' training files, and CTS's plans, policies and procedures.

Grades awarded to learning sessions

	Grade 1	Grade 2	Grade 3	Grade 4	Grade 5	Grade 6	Grade 7	Total
Hairdressing & beauty therapy	0	0	0	1	0	0	0	1
<b>Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>1</b>

## OCCUPATIONAL AREAS

### Hairdressing & beauty therapy

Grade 5

Programmes inspected	Number of learners	Contributory grade
Work-based learning for young people	23	5

5. There are 23 trainees in hairdressing. They are recruited through advertising and the careers service. Of these, five are foundation modern apprentices and 18 are on NVQ training. There are no advanced modern apprentices. The training and assessment of the NVQ is subcontracted to a local college. All trainees attend the college one day a week for off-the-job training, which includes key skills training. The college assesses the trainees' practical and theory competencies during this time. CTS's training adviser reviews progress every eight weeks. The college gives a further written report on the trainees' progress at the end of each term. They are also responsible for the internal verification of the trainees' work.

The following tables show the achievement and retention rates up to the time of inspection.

Work-based learning for young people										
Foundation modern apprenticeships (FMA)	1996-97		1997-98		1998-99		1999-2000		2000-01	
	No.	%	No.	%	No.	%	No.	%	No.	%
	Number that started							7		0
Still in training							5	71	0	0
FMA framework completed							0	0	0	0

Work-based learning for young people										
Advanced modern apprenticeships (AMA)	1996-97		1997-98		1998-99		1999-2000		2000-01	
	No.	%	No.	%	No.	%	No.	%	No.	%
	Number that started			2		2		1		0
Still in training			0	0	0	0	0	0	0	0
AMA framework completed			2	100	0	0	0	0	0	0
NVQ level 2 completed			2	100	0	0	0	0	0	0
NVQ level 3 completed			2	100	0	0	0	0	0	0

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NVQ Training										
NVQ Training										
	1996-97		1997-98		1998-99		1999-2000		2000-01	
	No.	%	No.	%	No.	%	No.	%	No.	%
Number that started			4		9		10		18	100
Still in training			0	0	1	11	4	40	13	72
Individual learning plan completed			3	75	1	11	2	20	0	0
Left without completing individual learning plan			0	0	6	67	4	40	5	28
NVQ level 2 completed			3	75	0	0	1	10	0	0
NVQ level 3 completed			0	0	1	11	1	10	0	0

### STRENGTHS

- supportive partnership arrangements

### WEAKNESSES

- poor assessment practices
- poor co-ordination of on- and off the job training
- inadequate progress reviews
- failure to use basic skills support resources
- insufficient off-the-job training and assessment
- weak internal verification

### OTHER IMPROVEMENTS NEEDED

- better retention rates

6. CTS's training adviser for hairdressing has developed works in partnership with the college personnel, the salon employers and the trainees. This strength was noted in the self-assessment report. To promote and improve the quality of the work-based training, she visits the college every week to support the trainees and discuss any problems with the training staff. The local branch of the Hairdressing Federation has recently invited her to become their educational adviser and help to keep employers up-to-date with developments in work-based training. For the first time this year, CTS will present two awards to their work-based trainees, rewarding outstanding performance in the last year. CTS's adviser introduced this new celebration of success by negotiation with college staff. The award ceremony is to be combined with the traditional annual college event.

7. Assessment practices are poor. There is no initial assessment of trainees' key skills

when they start training. There is no use of the awarding bodies' procedures for assessing what skills trainees already have. This is despite many trainees already having worked in hairdressing salons before beginning their training. The lack of thorough initial assessment is identified as a weakness in the self-assessment report. There are no assessments of practical activities carried out by trainees at work, despite some salon staff having the required assessor awards. CTS and the college have been considering introducing a pilot scheme that will include workplace assessment. However this is still at the discussion stage. Little use is made of witness testimonies as evidence for trainees' portfolios. There is very little use of any written evidence about what trainees do at work and their use of particular products. Trainees are not properly involved in the assessment process. Some of the planning to ensure appropriate training and assessment is inadequate.

8. As the self-assessment report recognises, the practical training sessions at the college are primarily based on what is in the appointment book for that day. Although the trainees only have this one opportunity to be assessed, priority is still given to the clients' needs rather than the training and assessment needs of the trainee. Poor planning of training results in first year trainees carrying out tasks about which they have received no training. No assessment plans are drawn up between the trainee and the trainer before any assessments happen. Trainees are sometimes assessed the first time they carry out a practical task; in most cases, this results in failure. These weaknesses are not identified in the self-assessment report. Little formal feedback is given to the trainees about either the practical tasks or their written work. Some trainees are unsure of the result of some of their practical assessments. Assessments are not systematically recorded when they occur. The trainees are sometimes unclear about what they have been assessed on and monitoring documents are not systematically completed. Many of the trainees are unaware of what they still have to do to gain their qualification. The trainers' own paperwork is up to date.

9. There is some poor co-ordination between on and off-the-job training. Employers are unaware of what the trainees will be learning at the college each week. There is no procedure for keeping them informed about the progress and training needs of the trainees. CTS prepares and sends a written report to the trainees at the end of each term. Some of the contents of these reports are not very useful. There is no system for sharing copies of the reports with the employers, as CTS receives all copies of the reports and distribute them to the trainees. The CTS adviser does share information with the employer when problems arise and the college is concerned about a trainees' progress. No training plans are devised for activities to be carried out in the workplace. Many of the trainees receive very little formal training from their employers. In those salons which do hold specific training sessions, there is no co-ordination between what the trainee is doing at the college and sessions at work.

10. The progress reviews do not focus on achievement of qualifications. Progress reviews are carried out at regular intervals by the training adviser, who has not worked as a hairdresser. The reviews are good for responding to the pastoral needs of the trainees and any problems with behaviour, slow progress or non-attendance are also

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dealt with. However, her lack of specialist knowledge means that the adviser is not able to set realistic and meaningful learning goals for the trainee. Action plans are not drawn up to help trainees to make progress. Trainees are not set clear target dates for achieving certain goals at their progress reviews. This was not identified as a weakness in the self-assessment report. Employers are also required to comment at trainees' progress reviews, but this does not happen systematically. Some of the employers' comments on the progress review sheets are not detailed enough.

11. Trainees identified as needing basic skills support do not systematically receive it. The college has resources to help with basic skills, but due to time-tabling and financial constraints this support is not systematically given to the trainees. Some trainees are discouraged from moving on to a higher NVQ level as the amount of support they will need is not available. Potential trainees are directed to other training providers if CTS identifies that they have additional learning needs at interview. There is little useful support for trainees with dyslexia. The key skills training is inadequate and poorly organised.

12. There is not enough training and assessment at the college. The college training is only available for 34 weeks of the year. There are large gaps when there is no training and assessment at all. The college summer recess results in trainees having no training and assessment for eight weeks. Starting times for new trainees are restricted; most have to wait until the college begins training again in September, which means that some trainees can wait to start training for as long as seven months from when they first apply. The choice of optional NVQ modules is limited and the trainees are unaware of what the optional modules are. Modern apprentices are given no choice: all are offered the same module. Some trainees make slow progress and have not completed any NVQ units at the end of their first year in training. Trainees at the end of the second year have still not been assessed in pin curling and finger waving, which are basic hairdressing techniques, although the training in these subjects took place at the beginning of the first year.

13. There are weak internal verification procedures at the college. Internal verification of the portfolio evidence is only carried out at the end of each year. At this stage only a percentage of trainees' portfolios is checked. If anything is found to be missing trainees who have finished their training have to return to the college to complete their work. The proportion of trainees who achieve the goals on their individual training plans has been poor. Between 1998 and 2001, 37 trainees started NVQ training. Of these, 41 per cent left without finishing the training on their individual training plans while only 8 per cent completed their training. However retention rates are improving and 72 per cent of those who started NVQ training since April 2000 are still in training.

### Poor Practice

*One trainee due to complete her NVQ has yet to complete the assessments in shampooing.*

## LEADERSHIP AND MANAGEMENT

## Grade 5

14. CTS is the training arm of the Lincolnshire chamber of commerce. It has three training officers who report to the manager, who in turn reports to the chief executive of the Chamber of Commerce. Training officers are responsible for recruiting and reviewing the progress of their allocated learners. They also carry out assessment in the workplace. CTS offers training in seven areas of learning: hair and beauty, engineering, business administration, retailing and customer service, veterinary nursing, manufacturing and health and social care. It provides off-the-job training and assessment for learners on retailing and customer service and some business administration programmes. Assessment and training in the other areas are subcontracted to local further education colleges and private training organisations. CTS has an equal opportunities policy and some procedures for quality assurance. It produced a self-assessment report in January 2001 with an accompanying action plan. CTS reported that it had carried out self-assessment in the past but was not able to show any earlier self-assessment reports to inspectors.

### STRENGTHS

- effective preparation for new key skills framework
- good monitoring of NVQ progress for some learners

### WEAKNESSES

- inadequate use of data to bring about improvements
- lack of clear leadership from senior management
- lack of workplace training plans
- weak induction process
- poor promotion and monitoring of equal opportunities
- inadequate actions to deal with complaints
- inadequate quality assurance arrangements
- little action-planning for improvement
- weak management of subcontractors

### OTHER IMPROVEMENTS NEEDED

- better recording of retention data
- equal opportunities training for staff and learners
- better planning of in-house internal verification
- wider involvement in self-assessment process

15. CTS has become an approved centre for external assessments of the new key skills awards. It has introduced procedures to administer the external tests and for candidates to sit mock tests. All staff either have the key skills award at level 3 and the key skills

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practitioner award, or are working towards them.

16. There is good monitoring of some learners' progress. Those learners who are assessed by CTS staff have a monitoring document in their portfolio that clearly shows what progress they have made towards their NVQ. Each element is listed with a target date for completion and useful information about the assessment. It is clear to both the learner and assessor what has been achieved, what has still to be done and when it is to be done. A copy of this is also kept in the learner's file at CTS's offices. However, this practice is not extended to those learners assessed by subcontractors.

17. CTS maintains information about learners on a computer database. Learners' personal details are kept on a computer at another site, which makes it difficult for staff to make effective use of the data. At the main office, further computerised details about learners' training programmes, start and finish dates and achievements are kept. It is not easy to find out details such as retention and achievement rates from this database and CTS struggled to provide inspectors with accurate data throughout the inspection. The data are not regularly analysed, as noted in the self-assessment report, and are not used to bring about improvements or to report on the performance of particular training programmes or CTS itself. Equal opportunities data are collected, but are not analysed or used to develop action plans and targets.

18. For the past two years CTS staff have been working in the knowledge that CTS is to be taken over by another organisation. During this time, the training staff have not been set targets or given clear leadership by senior management. The department has only been told to maintain existing learner numbers. Staff should have an annual appraisal but these have not always taken place when they should, a point noted in the self-assessment report. The manager has not had an appraisal since 1996. Staff are set targets during their appraisal. Some staff have been set targets for recruitment and placement of learners but others do not have clear, measurable targets. Targets do not link to CTS's aims since these have not been published.

19. There are no plans covering workplace training to show what training will take place, the methods to be used and who is responsible. A few employers are developing their own plans but these are focused on the needs of the employer and are not always linked to the requirements of the NVQ or apprenticeship training. Few employers understand their responsibility to plan and provide suitable training. CTS gives employers a handbook which explains their responsibilities towards learners but this is not followed up and although employers recall being given it, they do not use the book much. The handbook states that training officers will work with employers to plan the training but this does not usually happen.

20. Induction for most learners other than in hairdressing consists of a two-hour meeting with a training officer at CTS's offices; hairdressing learners are offered 2 half-day induction sessions. At their induction, learners are shown the policies on equal opportunities, supervision and attendance and the grievance procedure. The requirements of the NVQ they will be working towards and the assessment process are

explained to them. They are given a handbook containing this information. Information provided during induction is not reinforced subsequently. There are few records of learners receiving an appropriate induction to the workplace and no system to ensure that induction is of an acceptable standard. Learners are given a work-based project to complete as part of their induction to ensure that they understand the basic health and safety procedures of the workplace.

21. The reasons for learners leaving the programme early are recorded on a database. These records are not always comprehensive and are not sufficient to analyse trends in people leaving. Records do not show what action has been taken to deal with retention problems.

**Equality of opportunity**

**Contributory grade 5**

22. CTS has an equal opportunities policy, though this is largely a statement of intent to secure equality of opportunity rather than a list of specific measures. Overall responsibility for equal opportunities lies with the training manager. The policy does not include any procedures for putting it into practice. CTS has included an action plan to improve equal opportunities in its self-assessment report but no action has yet been taken to rectify the weaknesses recognised in the self-assessment report.

23. Some initiatives have been used to promote equal opportunities. Equal opportunities monitoring has been incorporated into the internal verification process. Learners are asked to comment on whether they feel they are being treated fairly and in accordance with CTS's policy. However, there is no fuller discussion of learners' understanding of the subject. Learners are given a copy of CTS's equal opportunities policy in their induction packs. However, some staff providing induction do not have sufficient understanding of equal opportunities. Some discussion about how to improve equal opportunities practice takes place in the assessor meetings though the results of these discussions are not clear. Chamber Training services provides an information pack for employers, which includes an offer to support employers develop equal opportunities: the information also outlines the benefits and sound business sense afforded by active promotion of equal opportunities. The effect of this initiative has not yet been monitored. This pack is not offered to subcontractors. There is good access to CTS's training centre, although some of the employers' premises are less easily accessible.

24. Chamber Training Services initial assessment is not in line with good equal opportunities practice. Applicants attend an initial interview with CTS, where staff work through a checklist. The content of this checklist is not appropriate. It encourages a subjective assessment of learners and includes questions concerned with appearance, 'physical characteristics' and police involvement. CTS uses the Basic Skills Agency assessment test but there is no evidence that this is then used to provide support which matches the diverse needs of learners; where there is a clear need to arrange additional basic skills support for learners, this has not been done. The assessment process does not adequately ensure that the basic skills needs of learners are met in their training. Learners do not develop their full potential. Some CTS learners are on training which is not challenging enough.

25. No targets have been developed for recruiting learners from under-represented groups. There are no minority ethnic learners and there has been little active promotion of CTS's commitment to equal opportunities in its marketing literature. CTS collects equal opportunities data, but does not adequately monitor and analyse it to judge how well the equal opportunities policy is implemented, both in the training centre and in workplaces.

26. Chamber Training Services does not have a comprehensive or effective procedure to deal with complaints. There is a grievance procedure for learners, who are given details of this in their induction pack but there is no grievance procedures for staff or any system for other customers and partners to complain. There is no complaints file and when complaints are received they are kept in the appropriate learner's file. There are no

records to show whether complaints have been appropriately dealt with or what actions have been taken to solve problems and to prevent them occurring again. CTS has no harassment policy and both learners and some staff have a poor understanding of what harassment is.

**Quality assurance**

**Contributory grade 5**

27. CTS does not have adequate arrangements to assure the quality of training and assessment for most learners. Internal verification of the assessment undertaken by CTS staff is thorough, but this only covers 11 of the 51 learners. There are some quality assurance procedures but there is no overall framework for quality assurance. Many key activities such as monitoring subcontractors, recruitment, initial assessment, training in the workplace and reviewing learners' progress are not adequately covered by quality assurance procedures. Staff are not clear about the procedures that do exist and no checks are made to ensure that procedures are actually used or still suitable. Feedback is not sought from learners, employers or subcontractors about the quality of training and assessment or the services provided by CTS, a weakness identified in the self-assessment report.

28. The self-assessment report produced in January 2001 was the first to have an action plan included. The training manager wrote the self-assessment report with some contribution from staff. Employers and other interested parties were not involved. Staff do not have their own copies of the report and do not understand the action plan. The self-assessment report was generally self-critical and inspectors agreed with many of the weaknesses, however it did not identify all of the key weaknesses and many of the strengths listed were no more than normal practice. It did not adequately describe how the quality of training and assessment is monitored. The action plan has not been updated nor is it regularly reviewed. Many of the target dates for implementation have passed and no attempt has been made to update the plan. It is not discussed at staff meetings and staff are not clear about their own contribution to the actions listed. Very few of the actions in the plan have been implemented and little progress has been made.

29. CTS has recently introduced service level agreements with subcontractors. These state that the subcontractor is to provide training and assessment, report to CTS on learners' attendance and progress and provide access to information. They do not adequately explain how the quality of training and assessment is to be monitored or the quality of service which is expected. The CTS training officer visits one subcontractor regularly to check on learners' attendance, as the subcontractor does not always provide this information. CTS does not have enough meetings with subcontractors and reports about learners' progress are not always provided in accordance with the service level agreement. CTS does not share good practice with its subcontractors.

30. CTS's assessment of hairdressing trainees is inadequate, with poor initial assessment and a lack of work-based assessment once trainees have started their training. Planning and record-keeping of assessments are inadequate. Internal verification is neither frequent enough nor rigorous enough. Assessment and internal verification of those learners being trained by CTS in-house is better, but there are only 11 of these learners.

### Poor Practice

*One learner's file contains an invoice for college fees after he did not turn up to college. A letter accompanying the invoice asks the learner to pay a contribution towards the days he was not at college. There are no records to show that the reasons for his non-attendance were investigated. It is not clear if the invoice was actually sent.*

*Two learners who completed their modern apprenticeships over a year ago have not received their modern apprenticeship certificates. No action is being taken by CTS to obtain these certificates.*