



# Post Recognition Monitoring Policy

Version History

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6	October 2021	Sarah Edmundson	Review (Centre Handbook)
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9	September 2023	Sarah Edmundson	Separated into individual policy
10	January 2024	Abigail Dannatt	Design Change
11	June 2025	Quality Assurance	Lower and large registration policies merged into post monitoring
12	September 2025	Quality Assurance	Programme Notification Form

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## Introduction

This policy outlines our approach to reviewing the performance and effective delivery of assessments at Centres (and individual tutors/assessors acting as Centres). Focus Awards will appoint an EQA who will undertake future quality assurance engagements at your Centre.

On each engagement the EQA will complete a Centre monitoring report and any changes within your Centre will be recorded so that amendments may be made to your Centre profile.

## Engagement Preparation and Frequency

The EQA will normally undertake two annual engagements\*, however additional engagements may be carried out if there are concerns about your Centre's performance; there has been a significant change in the number of qualifications you are offering, quantity of learners that have been registered, or you are delivering a new form of assessment at the Centre. Equally, additional engagements may be carried out in response to issues that may have emerged from an investigation into a complaint, appeal or if issues have been raised by another AO e.g. they have notified us due to suspected/actual instances of malpractice/maladministration at your Centre.

\* Focus Awards EQA strategy for Centres delivering Entry / Level 1 qualification only is one engagement every year.

In addition to the regular EQA engagements, Focus Awards reserve the right to carry out other pre-arranged or unannounced visits in the interests of ensuring maintenance of quality standards. Such visits may be undertaken by the EQA or other representative(s) from Focus Awards and will not warrant an additional charge. You must provide Focus Awards and the regulatory authorities, upon request, with access to your premises, people and records relating to learner assessment, achievement and internal quality assurance. If you fail to provide access, fail attend, or fail agree to requested EQA engagements, Focus Awards will suspend your Centre's right to claim certification until access is provided. If you do not comply with this requirement you will have your Centre recognition removed.

Once an engagement date has been agreed, you will need to ensure that the appropriate members of staff, all requested documentation is provided and access to course and staff records are available.

If you cancel an EQA engagement at short notice the EQA will contact the Quality Assurance Manager who must be satisfied that there was a legitimate reason for the cancellation. If this cannot be established, Focus Awards will reserve the right to withhold certification claims until a monitoring visit is completed.

## EQA Engagements/Monitoring

Whilst undertaking an engagement and/or as part of the overall monitoring approach, each EQA should (to ensure that every assessment for a qualification that it makes available is delivered effectively and efficiently):

- ensure, through appropriate sampling/moderation, that assessment arrangements are fit for purpose and the criteria against which learners performance is differentiated are being applied consistently by assessors within and across Centres and in accordance with requirements specified for each qualification;
- check that any Centre based assessment activities are being implemented appropriately and consistently;
- ensure your Centre is taking all reasonable steps to prevent the occurrence of malpractice or maladministration;
- confirm that previously identified action points have been met;

- confirm that assessments are conducted by appropriately qualified and occupationally expert assessors;
- confirm that your Centre has the appropriate resources and expertise to deliver our qualifications in accordance with Focus Awards, sector and/or regulatory requirements;
- where confidentiality in the contents of assessment materials or information about the assessment is required in order to ensure that a qualification that Focus Awards makes available (or proposes to make available), reflects an accurate measure of attainment, the EQA must ensure that your Centre maintains such confidentiality;
- confirm all learners undertake an initial assessment in order to identify barriers to assessment, exemptions and/or recognition of prior learning (RPL);
- sample assessment decisions to confirm that the learner evidence is valid, authentic, reliable, current, sufficient and that national standards, specific rules detailed in the qualification guidance documents and regulatory requirements are being consistently maintained and adhered to;
- where an assessment is required to be completed under specified conditions, sample 'live' assessments to ensure that learners complete the assessment under those conditions;
- take all reasonable steps to avoid any part of the assessment of a learner (including by way of moderation) being undertaken by any person who has a personal interest in the result of the assessment. Where having taken all such reasonable steps, an assessment by such a person cannot be avoided, the EQA must ensure arrangements have been put into place for the relevant part of the assessment to be subject to scrutiny by another person;
- confirm that assessment decisions are regularly sampled, through internal quality assurance, for accuracy against the national standards;
- check that claims for certification are authentic, valid and supported by auditable records and that learners have met the specified level of attainment;
- ensure that your Centre is retaining appropriate records of assessment and internal verification decisions for three years;
- ensure that your Centre is meeting Focus Awards requirements for learner data retention as set out in our guidance materials to Centres;
- advise and support your Centre on the interpretation of national standards, learning outcomes and assessment criteria;
- provide your Centre with feedback and support upon completion of any prior internal quality assurance activities uploaded to the Qualitas system when requested by Focus Awards;
- provide your Centre with up-to-date information and advice in line with Focus Awards qualification and regulatory authority guidance and requirements;
- recommend the application of appropriate sanctions in line with our Sanctions Policy, if your Centre fails to meet our requirements;
- identify opportunities at your Centre to offer additional Focus Awards qualifications (where appropriate).

## Sampling within a Centre

In order to make decisions on the matters listed an EQA should see samples of the following at each engagement and/or over a suitable period of time with the EQA recording the sample and the rationale behind its selection in the monitoring forms:

- evidence that tutors, assessors and IQA's have appropriate qualifications and experience to meet the assessment strategy for the awards/units they assess/verify;
- evidence of continuous professional development (CPD) for tutors, assessors and IQA's and the associated records;
- evidence that learners have access to fair and unbiased assessment;
- evidence of valid claims for exemptions and/or RPL (recognition of prior learning);

- evidence that assessments are structured effectively in terms of planning, assessing, review and feedback;
- assessment instruments, evidence, tasks and assessment methods (e.g. learner portfolio or other evidence or assessment conditions) to ensure they are appropriate;
- evidence that assessors are taking part in standardisation activities;
- evidence that your Centre is complying with our policies and procedures;
- the assessment decisions of all assessors;
- all assessment locations to ensure standards are being consistently applied;
- internal quality assurance and assessment records including feedback to assessors;
- learner registration and claim records for units and qualifications;
- IQA strategy and sampling records;
- details of any appeals, or reasonable adjustments;
- evidence that your Centre has a diversity and equality policy, appeals policy, complaints policy and arrangements to prevent and investigate instances of malpractice and maladministration and that these are being applied and monitored appropriately.

In developing a sampling strategy for your Centre, the EQA must take into account the specific circumstances attached to your Centre. Particular factors which should be considered when determining the scope of a sample may include:

- number of registered learners;
- number of certificates claimed;
- assessor and IQA competence- inexperienced or unqualified assessors may not be familiar with the assessment methods or standards and may need careful monitoring until they develop the necessary expertise. Therefore, a sample will contain a sufficient proportion of their assessment decisions;
- learner/assessor ratios;
- learner/tutor ratios;
- IQA/assessor ratios;
- the number of sub Centre/satellite sites and their geographical dispersion. Where a Centre has a number of assessment sites the sampling plan must enable the EQA to verify that assessment and internal quality assurance practices are maintained with equal rigour and consistency at all locations;
- your Centre's track record in complying with our requirements and any agreed action plans;
- rate of staff turnover.

An EQA should ensure that their sampling strategy involves not only the inspection of evidence, but also meetings with IQA's, assessors and learners, in order that the EQA can confirm whether the process of assessment, as well as the standards being used to judge learner competence, are consistent and meet national standards.

If you fail to make available learners selected for interview the EQA must inform the Quality Assurance Manager who will require you to provide proof that these learners exist. If this cannot be clearly established the Quality Assurance Manager will decide on what sanctions should be applied and the nature of any potential malpractice/maladministration investigation.

Whatever the precise plan used, the final sample must be sufficient for the EQA to:

- confirm the consistency and authenticity of assessment decisions;
- confirm the validity of claims for certification and authenticity of learners' evidence;
- provide evidence to support their conclusions.
- If the sample shows that you are not applying the required standards, the EQA will:
- identify and record the specific area of concern;
- confirm if they had to overturn an assessment carried out by your Centre in which case they must immediately notify the Quality Assurance Manager;

- feedback immediately to the IQA and/or your Centre representative and request a further sample to ascertain the extent of the non-compliance;
- record their findings in their report;
- recommend sanctions, if appropriate;
- create an appropriate action plan for your Centre.

## Programme Notification Form

The purpose of this notification is to ensure Focus Awards can arrange an External Quality Assurance (EQA) observation during the practical assessment phase of the qualification. We consider this an essential process to be to maintain quality assurance and compliance standards, all centres delivering high-risk qualifications. Centre must notify Focus Awards in advance of programme commencement. This enables appropriate planning and scheduling of EQA observations during learner practical assessments.

'High Risk' in this instance is defined as qualifications at Level 4 and above that use chemicals, lasers, needles and bladed equipment.

Qualifications that fall under High Risk include:

- Focus Awards Level 4 Certificate in Skin Needling Treatments (RQF)
- Focus Awards Level 4 Certificate in Chemical Skin Peeling Treatments (RQF)
- Focus Awards Level 4 Certificate in Thermolysis and Cryotherapy for Blemish Removal Treatments (RQF)
- Focus Awards Level 4 Diploma in Advanced Skin Science and Clinical Aesthetic Procedures (RQF)
- Focus Awards Level 4 Certificate in Dermaplaning Treatments (RQF)
- Focus Awards Level 4 Certificate in Enhancing Eyebrows with Microblading Techniques (RQF)
- Focus Awards Level 4 Certificate in Micropigmentation (RQF)
- Focus Awards Level 4 Certificate in Scalp Micropigmentation (RQF)
- Focus Awards Level 4 Certificate in Laser and Intense Pulsed Light (IPL) Treatments (RQF)
- Focus Awards Level 4 Certificate in Plasma Pen Technique for Skin Tightening and Lesion Removal (RQF)
- Focus Awards Level 4 Certificate in Scalp Micropigmentation Treatment (RQF)
- Focus Awards Level 4 Certificate in Ultrasound Cavitation Treatment (RQF)
- Focus Awards Level 4 Certificate in High-Intensity Focused Ultrasound Treatment (RQF)
- Focus Awards Level 5 Diploma in Tattoo Removal (RQF)
- Focus Awards Level 5 Diploma in Aesthetic Practice (RQF)
- Focus Awards Level 5 Certificate in Advanced Mesotherapy for Skin Rejuvenation (RQF)
- Focus Awards Level 5 Certificate in Hydro Dermabrasion and Radiofrequency for Skin Rejuvenation (RQF)
- Focus Awards Level 5 Certificate in Radiofrequency Treatment (RQF)

Prior to certification, all Centres delivering Service Enterprise (Beauty) Level 4 and above qualifications that are considered 'High Risk' must have one in-person EQA visit to monitor assessment practices to assure competence and safety. Once deemed safe and competent the Centre can continue to claim certification under the normal procedure.

Certificates will not be released if an in-person visit EQA visit is not completed and Certificates will only be released once the in-person visit is concluded and the Centre is deemed safe, compliant and competent.

Where possible we will combine your Annual EQA monitoring visit with this process and a full day fee will be charged to ensure observation of assessments and EQA monitoring can be undertaken.

If additional visits are required to observe assessment, these will be charged per half day.

If only one 'High Risk' qualification is observed during the visit, Focus Awards reserves the right to request another visit to sample another 'High Risk' qualification. For example, where only lasers have been sampled, your EQA may request to also visit to observe qualifications which use bladed equipment and needles.

## Procedure

### Completion of Notification Form

- The Programme Notification Form must be completed fully and accurately by the Centre on Qualitas
- Incomplete or inaccurate forms may result in delays or the inability to conduct required EQA observations.

### Submission Deadline

- Completed forms must be submitted to Focus Awards no later than three (3) weeks prior to the start date of any 'high-risk' qualification programme.

### Submission Method

- The Programme Notification Form must be completed on Qualitas within the required timeframe. Once received, your EQA will contact you to arrange the visit.

### Purpose of Notification

- The advance notification allows Focus Awards to arrange an EQA visit to assure safety, competence and compliance - This ensures that delivery and assessment standards are met in line with regulatory requirements and national standards.

### Non-Compliance

- Failure to submit the Programme Notification Form on time may result in the delay of certification, suspension of the qualification delivery or invalidation of learner outcomes until an EQA observation can be arranged.

### Cancellation

- Cancellation fees apply, please refer to the Focus Awards Fees and Invoicing Policy

## External quality assurance reports

At the end of each engagement the EQA will provide a report to your Centre that:

- records the date of the engagement;
- details the monitoring and verification activities undertaken, including information on any sampling undertaken and who was interviewed;
- contains feedback to your Centre on the quality and consistency of its assessment process and the effectiveness of internal verification/quality assurance arrangements;
- highlights areas of good practice;
- specifies what actions your Centre must take if its performance does not meet our requirements, when these actions must be completed and who is responsible for completing them;
- If applicable, and only if serious weaknesses are found, details of any sanctions that will be imposed, or will be recommended to the Quality Assurance Manager to impose a rationale for such a decision (see the next section for details).

If your Centre is unhappy with the conduct or outcome of a quality assurance engagement the matter should be taken up through our Appeals procedure, following completion of the Centre Feedback Form following an EQA engagement.

## Reversing / making changes to an assessment decision

The role of the EQA ensures that assessments decisions are accurate, consistent and measured against awarding organisation criteria. In some instances there may be times when an assessment decision made by an assessor may be inaccurate and/or inconsistent, leading to the assessment not being fit for purpose or that the criteria against which a learners' performance is differentiated not being applied accurately or consistently. In these instances an EQA has the power to interject and reverse an assessment decision.

An adjustment to the assessment outcome may be made by the EQA at an appropriate stage, which may be before or after the assessment.

In order to avoid difficult situations wherever possible the EQA will try to interject the assessment process prior to the final assessment decision being awarded to the learner. In exceptional circumstances, If the EQA feels that previous decisions made by the assessor or assessor team will also have been affected then the EQA may request that relevant assessments procedures are reviewed and all relevant work re-assessed.

If the EQA does have to interject the assessment process they may need to discuss issues with the IQA, assessor or learner. In these situations you must organise an opportunity for discussion to take place with the relevant individuals.

The following areas of poor assessment practise will allow for EQA Interjection:

- Assessment of knowledge and skills that does not reflect the Focus Awards syllabus and or meet national standards;
- The assessment process disadvantages learners;
- Learners work is not authentic;
- Health & Safety requirements for the environment and physical resources are not adhered to;
- Insufficient qualified assessors to ensure assessment decisions cover VARCS;
- Assessors decisions are inconsistent across the sample of learners and range of evidence monitored by the EQA;
- No evidence of internal quality assurance by a qualified IQA;
- Insufficient records for audit of assessment to take place;
- Claims for certification are made prior to all assessment requirements being achieved in full.

The following indicates the level of risk for a reversal of an assessment decision:

Poor Assessment Practice	Action plan / possible Sanctions	Risk
Assessment of knowledge and skills that does not reflect the Focus Awards qualification specification and/or meet national standards	Close scrutiny of assessment decisions; Removal of DCS; Reassessment of learners; Suspension of Approval.	High
The assessment process disadvantages the learners	Assessment decisions have lost their integrity leading to possible certification that is invalid; Suspension of registration and certification.	High
Learners work is not authentic	Assessment decision have lost their integrity leading to possible certification that is invalid; Suspension of registration and certification.	High
Health & Safety requirements for the environment and physical resources are not adhered to	Development plan from Focus Awards to ensure all future assessments meet the requirements.	Medium
Insufficient qualified assessors to ensure assessment decisions cover VARCS	Assessment decisions have lost their integrity leading to possible certification that is invalid; Suspension of registration and certification.	High

Assessors decisions are inconsistent across the sample of learners and range of evidence monitored by the EQA	Close scrutiny of assessment decisions; Removal of DCS; Reassessment of learners where necessary.	High
Assessment methods are not diverse enough to allow full achievement of the qualification	Development plan from Focus Awards to ensure all future assessments meet the requirements.	Medium
No evidence of internal quality assurance by a qualified IQA	Assessment decision have lost their integrity leading to possible certification that is invalid; Suspension of registration and certification.	High
Insufficient records for audit of assessment to take place	Development plan from Focus Awards to ensure all future assessments meet the requirements.	Medium
Claims for certification are made prior to all assessment requirements being achieved in full	Assessment decision have lost their integrity leading to possible certification that is invalid; Suspension of registration and certification.	High

## Quality Assurance Measures for High-Volume Centres

By the very nature of this volume, Focus Awards considers such large volume centres to pose a 'higher risk' and therefore have the increased potential for incidents of Malpractice and Maladministration to occur, and more general instances of non-compliance with our own documented procedures.

To mitigate the potential for this risk, Focus Awards requires that larger centres receive the following expansions of our standard quality assurance activities.

- One engagement must be a centre visit which will be a standard monitoring visit (face to face or remote)
- Where practical elements are required the EQA must observe assessments being observed and assessed. Centres must provide planned assessment dates to their EQA to facilitate the visit.
- Other engagement activities may include:
  - o EQA phone calls
  - o Unannounced visits
  - o Additional sampling
  - o Action plans
  - o Additional phone calls to learners and staff to discuss delivery, assessment, and any highlighted issues.

When requested, those centres delivering entirely online courses must provide their EQA with login details to remotely observe delivery and assessments.

## Quality Assurance Measures for Low-Volume Centres

In the case of a centre registering up to 20 learners in any given year (across all qualifications they are approved to deliver), the allocated External Quality Assurer will undertake a desk based EQA review.

Beauty qualifications where high-risk equipment is being used will be exempt from this policy. Qualifications which include the use of needles, blades or lasers will require face to face visits as the EQA is required to

observe assessment practices whilst learners are using such items. This is to ensure that safe practice is evident, and the centre is compliant with health and safety requirements.

A 'year' is defined as the time between annual EQA review/visit periods.

Desk-based sampling will quality assure learners' written work, examine centre management systems, review staffing, review qualification delivery and resources, examine the internal quality assurance processes, and examine learner support. Focus Awards will also talk to staff and registered learners.

The most recent EQA Centre Monitoring Form will be used for desk based EQA reviews.

Centres must video record a minimum of 20% of their registered learners undertaking any practical elements or assessments and make those recordings available to the EQA team. A voice recording may also be used in some circumstances where a learner is undertaking a verbal assessment (e.g., providing feedback to a learner for the assessor qualification).

Centres must retain all video evidence. However, in line with GDPR good practice, Focus Awards will delete and remove the video evidence from its own systems once it has been reviewed by the EQA.

Centres have the option to directly request an 'in-person' visit from their allocated EQA (refer to our pricing policy for the costs of this service).

An in-person visit may also be initiated by Focus Awards as part of its overall centre monitoring procedures.

Centres subject to this policy are ineligible for Direct Claims Status (DCS) and as such must submit all learner works for EQA sampling.

## Contact us

If you have any queries about the contents of the policy, please contact our support team:

E: [info@focusawards.org.uk](mailto:info@focusawards.org.uk)

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