



TRAINING STANDARDS COUNCIL

INSPECTION REPORT JULY 2000

Vocational Legal Training Ltd

SUMMARY

Vocational Legal Training Ltd provides training in business administration which is less than satisfactory. Theory is not taught systematically, and the programme focuses on pre-set assignments rather than on evidence drawn from trainees' work roles. The company's staff share a commitment to equal opportunities, and monitor training thoroughly to ensure that trainees are fairly treated. Vocational Legal Training Ltd has a valuable network of external contacts. Employers do not participate sufficiently in training programmes. Trainees and employers' feedback is collected and acted upon. There are gaps in the quality assurance system.

GRADES

OCCUPATIONAL AREAS	GRADE
Business administration	4

GENERIC AREAS	GRADE
Equal opportunities	2
Trainee support	2
Management of training	3
Quality assurance	3

KEY STRENGTHS

- ♦ strong company culture of equal opportunities
- ♦ rigorous monitoring of equal opportunities
- ♦ thorough initial assessment
- ♦ effective external networking
- ♦ positive response to feedback from trainees and employers

KEY WEAKNESSES

- ♦ over-reliance on pre-set tasks
- ♦ unsystematic approach to theoretical training
- ♦ lack of employers' involvement in training programmes
- ♦ weak quality assurance system

INTRODUCTION

1. Vocational Legal Training Ltd (VLT) is a privately owned company established in 1996 to provide vocational training for people working in administrative positions in law firms. In 1997, VLT obtained a contract from Leeds Training and Enterprise Council (TEC), its co-ordinating TEC, to offer training towards national vocational qualifications (NVQs) at levels 2 and 3 in business administration. In 1998, the company negotiated a similar contract with Calderdale and Kirklees TEC. At the time of inspection, VLT had 53 trainees in the Leeds area and 23 trainees in Calderdale and Kirklees, all of them modern apprentices employed in solicitors' firms. Tutor/assessors visit trainees in the workplace each month for a tutorial, during which assessment and action planning takes place. The company also has training in business administration subcontracted to it from providers in Manchester, Newcastle, Bradford, Humberside, Sheffield, Nottingham and London. It has recently obtained a further contract from Leeds TEC to offer NVQs in information technology operations. This programme had only been running a few weeks at the time of inspection, and most trainees following it were on a vocational 'taster' programme not funded by the TEC. Information from trainees on the information technology operations programme was used to support judgements in the generic areas, but not those relating to the occupational area.

2. The company moved to its premises in the centre of Leeds in December 1999. These comprise administrative offices, two training rooms, and an information technology centre. There are 24 members of staff.

3. The city of Leeds has a buoyant economy, with employment growing at approximately twice the national rate. Most jobs are in the services sector, notably in public administration, education and health, distribution, and banking and finance. Leeds is one of the principal centres for telephone-based customer services. Over the past decade, there has been an increase in employment in management and professional occupations, and a decline in manual occupations. In June 2000 the unemployment rate in Leeds stood at 3.6 per cent, close to the national average of 3.5 per cent, but lower than the average for the Yorkshire and Humberside region, which was 4.4 per cent.

4. In 1999, the proportion of 16 year olds achieving five or more general certificates of secondary education (GCSEs) at grade C and above was just under 38 per cent, compared with the national average of 47.9 per cent. Over 75 per cent of school leavers choose to stay in full-time education, with just under 20 per cent embarking on a work-based training course.

INSPECTION FINDINGS

5. VLT prepared its first self-assessment report in November 1999 for inspection in July 2000. Key members of staff attended several external training events in preparation for self-assessment, and support was received from Leeds TEC. The judgements and grades in the report were arrived at by the senior management team in consultation with other members of staff. The views of trainees and employers were sought informally, and used to develop the report.

6. A team of three inspectors, and a specialist from the legal profession, spent a total of 11 days at the company's premises in July 2000. They visited 13 workplaces, and interviewed 30 trainees, 11 workplace supervisors, and 15 members of VLT's staff. Twenty-three of the trainees were following administration training and seven were on the new information technology operations programme. Inspectors observed nine tutorials, and examined documents including trainees' administrative files and training plans, trainees' portfolios of work, policies, procedures and contractual information.

OCCUPATIONAL AREAS

Business administration

Grade 4

7. VLT provides modern apprenticeship programmes in administration and information technology and customer service. The administration programme started in 1997 and has 53 trainees in the Leeds TEC area and 23 in the Calderdale and Kirklees TEC area. The information technology programme started only a few weeks before inspection. It has seven trainees, all in the Leeds area. In 1998-99, 55 per cent of those who left training had completed their training plan and gained a level 3 NVQ in administration. All the administration trainees are employed in legal practices. All trainees already have a job when they become modern apprentices. Others receive help from VLT with finding suitable employment. Some modern apprentices spend a week at VLT at the start of their programmes. Once they have started employment, they do not attend the training centre, but receive monthly tutorials in the workplace, during which they discuss evidence and build their portfolios. Eight of VLT's staff act as tutor/assessors on the administration programme. They are led by the company's academic manager. All tutor/assessors have training and assessment qualifications and all have relevant occupational experience. Three have internal verifier awards. The self-assessment report identifies 30 strengths and eight weaknesses. The judgements offered are not always clear. A number of the strengths claimed represent no more than compliance with TEC contracts. The inspection grade awarded is lower than that given by VLT.

STRENGTHS

- ◆ good action planning
- ◆ achievement of additional qualifications by trainees

WEAKNESSES

- ◆ over-reliance on pre-set tasks
- ◆ poor assessment of trainees' performance
- ◆ unsystematic approach to theoretical training
- ◆ lack of understanding of NVQ process by trainees

8. Each of VLT's tutor/assessors is responsible for a group of trainees, whom they visit in the workplace once each month. The visits are arranged to suit trainees' working schedules, and, once organised, are conscientiously adhered to by tutors. Trainees value the continuity which this provides. Tutorials comprise a mixture of individual coaching, portfolio-building, and the assessment of paper-based evidence gathered since the previous meeting. They conclude with the negotiation of a short-term action plan for the trainee. This is the most purposeful and effective element of the monthly meetings. A detailed plan is produced which specifies exactly which units the trainee should concentrate on, and what evidence they should collect, over the following month. A copy of the action plan is given to the trainee's workplace supervisor. The plan is carefully monitored, and a discussion of the trainee's progress forms the starting point of each tutorial. Trainees find the action planning process helpful in motivating them and focusing their efforts.

9. All administration trainees have the opportunity to undertake occupationally relevant additional qualifications, such as a certificate in paralegal practice. Most trainees are keen to embark on the paralegal practice course, which they usually start after completing their NVQ level 3 in administration. They consider this qualification valuable in developing their knowledge of the legal system. Trainees also have the opportunity to complete units of the NVQ level 3 in customer service. These additional qualifications increase trainees' confidence, and enhance their future employability.

10. The administration programme is built around a series of support packs designed by VLT. Each gives an introduction to a unit of the NVQ followed by a series of tasks. The tasks are designed specifically to generate evidence for a particular unit. However, their use sometimes results in superficial work. For instance, one task involves analysing the categories of visitors to the candidate's workplace. The sheets for collecting data are usually provided by the tutor, not designed by the candidate. The data collected are entered into a simple spreadsheet, and subjected to attractively presented, but basic, statistical analysis. The focus on pre-set tasks means that there is insufficient scope for trainees to use

their initiative in collecting evidence, and to show competence at a suitable level. Although trainees are not required to use the tasks, most of them choose to base their NVQ work on them. They consider this to be a more straightforward approach than identifying alternative ways of gathering evidence, based around their specific work role.

11. Assessment focuses mainly on the tutor's appraisal of the written work which arises from completing the pre-set tasks. This provides insufficient examples of the trainees' ability to perform real tasks in real work situations. Observation in the workplace is rarely used. Few of the trainees interviewed had been observed carrying out tasks and few of the portfolios examined contain reports of observation of performance. Where such reports are included, they have insufficient detail, and do not include feedback to the trainees on their performance. Real work products, such as letters, are included in portfolios, but there is no evidence of the process involved in producing the work product. It is not clear what part the trainee played in producing the work, and under what conditions the work was produced. Witness testimony is used as additional evidence, but generally takes the form of a fairly brief statement, written by the trainee, and signed by his or her supervisor. The NVQ is usually approached unit by unit, making it more difficult for trainees to present naturally occurring evidence of competent performance over time. Trainees are generally unclear about how they are assessed.

12. Trainees who take the certificates in paralegal practice are given workbooks which guide them through this qualification and provide them with adequate theoretical information. However, trainees are given insufficient theoretical knowledge to support their administration NVQ. The packs of pre-set tasks contain a small amount of theory, but not sufficient for level 3. Trainees are not issued with an administration textbook. Some trainees who completed an NVQ level 2 in administration before joining VLT are relying on their theory notes from level 2 to complete their level 3. The company has no structured off-the-job training schedule, and no means of ensuring that all trainees have access to the appropriate theoretical training, and that their knowledge and understanding for all units of the NVQ are at an acceptable level. Some theoretical issues are discussed during tutorials, but this tends to happen in a reactive way, such as when a trainee asks a question, or shows a gap in his or her knowledge. Oral questioning is sometimes used to test trainees' understanding of key issues, but trainees' responses are not used as portfolio evidence.

13. Administration trainees lack an understanding of the NVQ process and their role in it. They describe the NVQ process as a matter of presenting written work which the assessor may accept and put in the portfolio, or give back to them with specific guidance on what improvements should be made. They see no clear dividing line between coaching and assessment. Their understanding is not improved by the mixture of activities occurring during each tutorial session. Key skills are integrated into the administration NVQ, and trainees are all aware of the requirement to complete key skills units. However, most are not clear about how, or when, this will be achieved. At the end of their programme, trainees participate

in a tape-recorded interview with their tutor, during which they answer questions about some of the units of their NVQ. However, the interview does not cover all units of the NVQ, and trainees' responses to questions are sometimes brief, and superficial.

GENERIC AREAS

Equal opportunities

Grade 2

14. VLT has an equal opportunities policy. The managing director has ultimate responsibility for implementing the policy but this responsibility is shared with all members of staff. The company also has a grievance and appeals procedure. Trainees have the right to refer grievances to their local TEC, to the careers service or to the company itself. Trainees are given a copy of the equal opportunities policy and the appeals and grievance procedure during induction. They are informed that VLT will not tolerate any form of discrimination. Employers are also supplied with a copy of the company's equal opportunities policy. One member of staff acts as the equal opportunities representative. The self-assessment report identifies a number of strengths and one weakness. Some of the strengths represent no more than compliance with TEC contracts. Inspectors agreed with two of the strengths claimed by the company. They did not consider the weakness claimed to be significant. They identified additional strengths and one weakness and awarded a higher grade than that given in the self-assessment report.

STRENGTHS

- ◆ strong company culture of equal opportunities
- ◆ rigorous monitoring of equal opportunities
- ◆ effective action to protect trainees from discrimination
- ◆ positive action to recruit under-represented groups

WEAKNESSES

- ◆ trainees' lack of awareness of company's grievance procedure

15. VLT's staff share a determination to provide equality of opportunity for all staff and trainees. Anti-discriminatory practice is promoted by word and example. All staff acknowledge the importance of treating one another and trainees equally. Trainees and employees are informed about the company's commitment to equal opportunities during their induction programme. They are told that any complaints about inequality or unfairness will be thoroughly investigated and systematically pursued. This gives them confidence that they will be fairly treated. Employers are given a copy of the company's equal opportunities policy and are required to indicate their commitment to it. In January this year a member of staff took on the

role of equal opportunities representative. She maintains an equal opportunities manual. This contains up-to-date articles on topics such as violence at work, disability, bullying, harassment and discrimination, and employment practices. The equal opportunities representative regularly updates staff on new national developments, and on any issues or complaints which relate to equality of opportunity.

GOOD PRACTICE

Many potential trainees require parental approval before they can begin a training programme. Family decision-making is particularly important for young Asian trainees. One of the introductory leaflets gives a summary of VLT's modern apprenticeships, the qualifications available, and the salaries offered. The leaflet is printed in English. Information has been translated into Bengali, Urdu and Punjabi so that it can be readily understood by minority ethnic groups and especially by some parents who prefer to read an Asian language rather than English.

16. The high priority given to equal opportunities is shown by the company's regular monitoring of equality issues. Equal opportunities is an agenda item at monthly law tutors' meetings and at monthly meetings for all staff. The minutes of these meetings record the equal opportunities issues which have been discussed and the action which has been taken. Equal opportunities issues are recorded sensitively and in detail. VLT tutors discuss equality of opportunity at the trainees' three-monthly progress reviews and trainees are invited to discuss any issues concerning equality and fairness. Trainees can also raise any concerns regarding equal opportunities during their tutors' monthly workplace visits.

17. Trainees are effectively protected from discrimination and harassment in the training centre and in their workplaces. When work placements are selected for trainees, attention is paid to proximity of the placement to the trainees' homes and to the suitability of the placement in terms of the trainees' gender and ethnic origin.

18. The company is aware of the need to widen participation in its training programmes. It is keen to make contact with and attract under-represented groups in the community that it serves. Initiatives have been taken to disseminate information more widely and to encourage applications from potential trainees who are interested in working in the legal profession. For example, local radio stations have been approached with requests that they interview VLT's staff about their modern apprenticeship training programmes and to include features on appropriate programmes to raise awareness of VLT's training programmes among ethnic, and other, minority groups. Articles about VLT's modern apprenticeship programmes have been included in Asian newspapers. The company responds positively to invitations to attend careers events, open evenings, and exhibitions and seminars organised by a local Asian business-development network. There is a comprehensive and well-managed computerised system for recording trainees' details. This includes information on the sources through which trainees learn about VLT's programmes. It enables the company to monitor its recruitment sources and to identify the success of each.

19. Trainees have a sound understanding of equality of opportunity but their knowledge of VLT's policies and procedures, particularly the grievance procedure, is vague. Those who are aware of its existence are unsure about how it relates to them and how they could use it to challenge an assessor's or internal verifier's decision. The grievance policy, like the equal opportunity policy, is given inadequate attention after induction.

Trainee support

Grade 2

20. Trainees learn about VLT's modern apprenticeship programmes through schools and the careers service, through recommendation from others, and through promotions at careers events and training exhibitions. When potential applicants enquire about training programmes, their details are entered on the company's database. If they do not submit an application form, they are contacted and reminded of the opportunities available to them. When application forms are received, trainees are invited to the company for an interview and initial tests. Trainees who are accepted by VLT attend an induction programme followed by a session which acquaints them with NVQ procedures. Unemployed trainees have their induction in the training centre. Tutors visit employed trainees in the workplace and present the induction programme there. Employed trainees are enrolled onto a modern apprenticeship and they begin their NVQ training immediately. Unemployed trainees are not enrolled onto a modern apprenticeship until they begin their employment. After a one-week in-house training programme, unemployed trainees attend the training centre for two days a week. They are helped to find employment so that they can begin their modern apprenticeship as soon as possible. VLT summarises the support it offers to trainees in a handbook. Trainees are provided with regular feedback on their progress and they are given frequent opportunities to discuss any aspects of the NVQ and their workplace experiences with their tutor. The self-assessment report identifies nine strengths and two weaknesses in trainee support. Some of the strengths represent no more than compliance with TEC contracts. Inspectors identified three strengths and two weaknesses and awarded the same grade as VLT.

STRENGTHS

- ◆ thorough initial assessment
- ◆ effective additional learning support
- ◆ active support for those seeking jobs

WEAKNESSES

- ◆ unmemorable induction for some trainees
- ◆ unclear review process

21. All trainees are initially assessed to determine their suitability for working in the legal profession and to decide which level of the administration NVQ is appropriate for them. Their personal qualities and attributes, such as oral communication, enthusiasm and knowledge, are assessed by means of a short oral interview. They are given two written tests. One is a reading-comprehension test and the other a problem-solving test. The results of these tests are effectively used to decide whether a level 2 or level 3 administration NVQ is suitable for the trainee. If neither is suitable, the trainee is referred back to the careers service or to another training provider who can offer an NVQ level 1 or a foundation training programme. The results of the interview and written tests are effectively used to indicate whether the trainee has additional learning needs, such as reading,

spelling or numeracy. Trainees also complete a questionnaire which is used to assess their understanding of basic legal terms. The results determine at which level trainees start their training.

22. During the initial assessment process, trainees are given advice and guidance on progression routes and how to get the most from their training. They are shown how they can ultimately progress to becoming a qualified solicitor. To enable them to make the most of their opportunities, tutors continue to give guidance throughout the training programmes. Tutors also help trainees to compile action plans and to find ways of making good progress with their NVQs. In addition to receiving visits from tutors every four weeks, trainees can contact them by telephone, fax and e-mail when required. Trainees have the opportunity to visit VLT's premises at any time to use computers or facilities which are not available in their work placements. VLT opens the centre on Monday evenings and, from time to time, on Saturday mornings.

23. After being accepted for a prevocational training programme, trainees who do not already have a job in a legal office have a one-week induction in the training centre. They take part in activities designed to help them find a work placement such as preparing curricula vitae and practising interview techniques. They attend the training centre for two days a week until a placement is obtained. The company has an extensive database of legal work placements. Efforts are made to obtain jobs for trainees as quickly as possible.

24. The overall impact of the induction process is weak. The extent to which trainees remember the content of the programme is very variable. The key messages from induction are not reinforced subsequently, nor is trainees' continuing understanding of them checked. Employers lack awareness of VLT's induction process and some employers have difficulty in recalling how trainees are inducted by their own organisations.

25. Trainees' progress is formally reviewed every three months. The review takes place during a scheduled monthly tutorial/assessment visit. Consequently, it occupies some of the time which is usually devoted to reviewing the trainees' action plans and to devising new plans, to assessing their work product and to assisting and supporting them. This results in a lack of clarity between progress reviewing, action planning, tutoring and assessing. Although employers sign and are given a copy of the review document, they are not always present when trainees' progress is reviewed by the tutor. The reviews are narrowly focused and based on trainees' progress towards their NVQs. They do not take a broader view of the trainees' progress in their job roles. Some of the review comments are not detailed enough and of little value. Although trainees are told that reviews will occur every three months, they are often extended over more than one tutorial/assessment visit. This fragments the review and reduces its benefit. When reviews extend over more than one visit, the review document cannot be completed and distributed as required. Staff have no qualifications in counselling but have or are working towards the postgraduate certificate in education.

Management of training

Grade 3

26. VLT has 24 staff, led by the managing director. There are 17 tutor/assessors, co-ordinated by the academic manager, and two administrative staff who work under the direction of the business manager. A further two members of staff have senior managerial responsibility for issues such as finance, marketing and equal opportunities. Tutor/assessors work with up to 50 trainees each, and cover a range of geographical locations. VLT's TEC contracts have grown steadily since the company began to take on government-funded work. A new database has been introduced for the collection and analysis of data on trainees' achievements. A staff appraisal system has recently been implemented, and all staff have been appraised. The company achieved the Investors in People standard in June 2000. The self-assessment report identified five strengths. Inspectors agreed with two of them. They judged two others to be no more than complying with TEC contracts, and another to be inaccurate. The weaknesses for management of training and quality assurance were the same, and all but one, which has been addressed since the writing of the self-assessment report, related to quality assurance. Inspectors found other strengths and weaknesses, and awarded the same grade as that given by the company.

STRENGTHS

- ◆ open, consultative management
- ◆ thorough, well-planned staff development
- ◆ effective external networking
- ◆ detailed business plan

WEAKNESSES

- ◆ employers' insufficient involvement in training programmes
- ◆ ineffective management of on-the-job training

27. VLT has a well-structured system of meetings involving employees at all levels within the company. Tutor/assessors meet monthly to discuss issues related to their occupational area. Senior staff participate in a strategy group, which also meets once each week to discuss corporate matters, and to outline company policy. The full staff team meets for one day every month, to exchange information on a range of procedural and strategic issues. All these meetings are minuted, with clear action points. In addition, staff liaise with each other informally, and tutor/assessors have regular one-to-one discussions with the academic manager to discuss their workloads, and the progress of trainees. Staff feel consulted, informed, and well supported by the company's management. They are keen to put forward suggestions for improvement, and confident that these will be constructively received. They value the openness of managers, and their collaborative style.

28. All company employees have a personal development plan, which records their individual training needs. This is written as part of their annual appraisal, and updated during regular meetings with their line manager. Staff training is readily available, and managers are conscientious and creative in identifying relevant opportunities. For example, two members of staff wanted to take a qualification in marketing. The managing director found a training provider who offered an appropriate NVQ, and allowed the staff time to produce evidence in the form of a draft marketing plan. This benefited both the staff and the company. Staff development is set within an overall plan which all employees can read. Each training event attended, or course undertaken, is evaluated by the member of staff concerned. The business manager collates the evaluations and provides an analysis of the overall effectiveness of VLT's staff development strategy.

29. VLT has been asked by Leeds TEC to participate in a series of initiatives and pilot projects. These have included prevocational programmes for young unemployed people, programmes for disaffected young people, many of whom have serious personal problems and learning difficulties, a key skills project, and an initiative to encourage young people who have dropped out of modern apprenticeship programmes to re-enter training. These projects have allowed individual members of staff to develop their skills and to increase the range of their work, and have allowed VLT to develop useful partnerships with other organisations.

30. VLT has a business plan which is produced annually, and updated regularly throughout the year. The business plan is based on a series of action plans maintained by the managing director. She discusses the action plans, and the company's short-term and long-term targets, with a consultant, who assists in the writing of the business plan. The business plan is clear and detailed. It shows achievable targets and realistic indicators of success. All employees are given a copy, and the content is discussed during staff meetings. Staff understand the company's short-term and long-term goals.

31. VLT has made efforts to increase the involvement of employers in their trainees' programmes. They have introduced an 'employers' commitment' document which outlines employers' responsibilities with regard to training. Employers have to sign this document at the beginning of a trainer's programme. A monthly newsletter, giving information about trainees' achievements, and company developments, is sent out to all trainees and employers. Workplace supervisors receive a copy of their trainees' action plan, and are given oral reports on their trainees' progress during tutors' visits. However, these strategies have not been fully effective in encouraging employers' involvement in training. Few employers know how many units of the NVQ their trainees have achieved, and some are unsure of the qualification being followed. Other than signing witness testimonies which the trainee writes out for them, they take no part in assessment, or in assisting trainees to identify evidence-gathering opportunities. Most do not see this as their role. Although they are given a copy of the trainees' quarterly progress reviews to sign, they do not take part in the review discussions. Their lack of involvement means that they are unable to effectively support their trainees in

developing their knowledge and helping them to achieve their qualifications. Some employers do not allow trainees any time during the working week to build their portfolios, although this is a clear requirement of the 'employers' commitment'. VLT has recognised the problems posed by employers' lack of involvement, and is working closely with two of the companies who employ large numbers of their trainees to devise strategies for improvement.

32. Trainees receive insufficient structured on-the-job training. VLT does not liaise with employers to ensure that there is co-ordination between trainees' NVQ work and the tasks they perform in the workplace. Although employers are sometimes asked to provide the trainee with a particular learning opportunity, this is not done in a structured way. VLT does not have a way of ensuring that on-the-job training is carried out systematically, and that it suits the particular learning style of each trainee.

Quality assurance

Grade 3

33. VLT meets the quality standards of the TECs with which it contracts, and of its awarding body. The company has a quality assurance strategy, and is developing policies and procedures to support it. Four staff share the responsibility for internal verification. The academic manager checks paperwork, and observes the performance of tutor/assessors. Feedback is collected regularly from trainees, employers and VLT's staff. The self-assessment report was written by the managing director in consultation with the rest of the staff. Trainees and employers' views were gathered through informal discussion and incorporated into the report. The self-assessment judgements for the aspect of quality assurance do not provide an accurate reflection of provision in this area. The strengths claimed represent no more than contractual compliance. Two of the weaknesses are statements of intent, rather than judgements. Inspectors agreed with one of the other weaknesses and considered that the other refers to management of training. Inspectors found other strengths and weaknesses and awarded the same grade as that given by the company.

STRENGTHS

- ◆ high level of compliance with external requirements
- ◆ positive response to feedback from trainees and employers

WEAKNESSES

- ◆ gaps in the quality assurance system
- ◆ insufficiently analytical self-assessment report

34. VLT has a good record of compliance with TEC contractual requirements, and often exceeds these. It takes seriously the judgements of external agencies such as awarding bodies, and works energetically to put suggested changes into place. The

company gathers feedback from trainees and employers using a series of questionnaires, some produced externally and some by the company. These are given out at various stages of the programme, at and after induction, and when a trainee leaves the programme.

35. The information gathered from these questionnaires analysed, and the results are discussed during staff meetings. Further feedback is gathered informally from trainees and employers, and is often acted upon. For example, a request from an employer that tutors take laptop computers on their tutorial visits for the use of trainees has now been met. When the company cannot meet a request, this is explained to those who made the request, and a reason is given.

36. VLT has a quality assurance strategy which outlines the key elements of its quality assurance system. The company is developing policies and procedures for each aspect of its work. Some of these, such as the procedures recruiting and interviewing trainees, are comprehensive and well designed, using a flowchart which is easy to follow. However, other sets of procedures, such as those covering assessment, are not as clearly set out. Policies have not been written for some aspects of training, such as trainees' induction and trainees' progress review. Others, such as the information technology policy, were written in 1998 and have not been updated. The company's financial director is examining all procedures to assess their usefulness, but this has not yet been completed.

37. Internal verification is undertaken by four members of staff. All portfolios are internally verified twice, once during work towards the qualification, and once when they are complete. A further 25 per cent of portfolios are selected at random and internally verified on three occasions. Internal verification decisions are recorded, and assessors receive written and oral feedback. The academic manager carries out regular observations of tutorials and other aspects of performance, and of paperwork. She gives tutors written and oral feedback on their performance. Where interaction with a group of trainees has been observed, this feedback is good and contains constructive suggestions for improvement. However, in other cases, such as the observation of a tutorial, the written feedback is provided in the minutes of law tutors' meetings. When shortcomings in performance or the completion of paperwork are identified, there is no written indication as to whether the issue identified has subsequently been addressed.

38. The company's self-assessment report is descriptive in style. Although it provides some useful contextual material, some of the judgements lack clarity. Some of the strengths cited represent no more than normal practice. A number of the weaknesses represent a statement of intent, or express regret about a current situation, rather than offering a clear and objective analysis of the company's performance. The judgements made do not always reflect the company's estimation of a grade.