

# INSPECTION REPORT

## **ITS Training Services**

**19 September 2003**



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 Jobcentre Plus programmes. 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 learning within the remit of a single inspectorate. The ALI is responsible for inspecting a wide range of government-funded learning, including:

- work-based learning for all people over 16
- provision in further education colleges for people aged 19 and over
- **learnirect** provision
- Adult and Community Learning
- training funded by Jobcentre Plus
- education and training in prisons, at the invitation of Her Majesty's Chief Inspector of Prisons.

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.

## Overall judgement

Where the overall judgement is that the provision is adequate, only those aspects of the provision which are less than satisfactory will be reinspected.

Provision will normally be deemed to be inadequate where:

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

This provision will be subject to a full reinspection.

The final decision as to whether the provision is inadequate rests with the Chief Inspector of Adult Learning. A statement as to whether the provision is adequate or not is included in the summary section of the inspection report.

# INSPECTION REPORT

## ITS Training Services

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## INSPECTION REPORT

### DESCRIPTION OF THE PROVIDER

1. ITS Training Services (ITS) is a private training company, specialising in the provision of training, consultancy and qualifications to import/export industry sectors. Since April 1999 it has provided work-based learning for young people. Learners are on foundation and advanced modern apprenticeship programmes and national vocational qualification (NVQ) programmes in retailing, customer service and transportation. There were too few learners in business administration and management for this area to be inspected. In addition to NVQs, ITS privately offers a range of short courses and qualifications. Private courses and qualifications comprise 40 per cent of ITS's business.

2. The main training and administrative office of ITS is in Felixstowe. A second office was opened in London in August 2003 as an operational base. Two partners have an active role in the training and management of ITS. The company has expanded rapidly over the past three years and currently employs 13 full-time and one part-time member of staff. ITS also has an office in Bulgaria, with two Bulgarian employees who are responsible for the development of ITS's strategy for training in the Eastern Block. ITS currently has 28 employers, 19 of whom are based in Suffolk.

3. ITS funds its training provision through Suffolk Learning and Skills Council (LSC) and London East LSC. A contract with Suffolk LSC has been held since April 1999 and with London LSC since 2000. There are no subcontractors. The Suffolk region, from which ITS recruits most of its learners, has a minority ethnic population of 2.2 per cent, compared with 9.1 per cent nationally.

4. ITS was awarded Centre of Vocational Excellence Pathfinder status in international trade and logistics in September 2002. Full status was confirmed during this inspection.

### SCOPE OF PROVISION

#### Retailing, customer service & transportation

5. There are 65 learners on programmes in retailing, customer service and transportation. Thirty-three are advanced modern apprentices, 27 are foundation modern apprentices and five are NVQ learners. Sixty-three of the learners are following programmes in international trade and services and two in customer service. All learners are employed. Assessment of diverse evidence is carried out at the training centre, although direct assessment by observation takes place in the workplace. Training for background knowledge is carried out electronically or by seminars held at the learners' place of work or at the ITS training centre. Learners are recruited on to programmes through their employers.

## ABOUT THE INSPECTION

Number of inspectors	4
Number of inspection days	16
Number of learner interviews	29
Number of staff interviews	15
Number of employer interviews	7
Number of locations/sites/learning centres visited	9

## OVERALL JUDGEMENT

6. The quality of the provision is adequate to meet the reasonable needs of those receiving it. More specifically, leadership and management at ITS are satisfactory, as is its approach to equality of opportunity. The quality assurance arrangements are unsatisfactory. The quality of work-based learning in retailing, customer service and transportation is satisfactory.

## GRADES

*grade 1 = outstanding, grade 2 = good, grade 3 = satisfactory, grade 4 = unsatisfactory, grade 5 = very weak*

Leadership and management	3
Contributory grades:	
Equality of opportunity	3
Quality assurance	4

Retailing, customer service & transportation	3
Contributory grades:	
Work-based learning for young people	3

## KEY FINDINGS

### Achievement and standards

7. **Retention rates are good on all programmes.** For advanced modern apprentices the rates have improved over the past two years, and all those who enrolled in 2002-03 are still in learning. Retention rates for NVQ programmes are good, although there has been a decline over the three-year period 1999-2002. Ninety-three per cent of foundation modern apprentices who enrolled in 2002-03 are still in learning.

8. Achievement rates for those on modern apprenticeship and NVQ training are satisfactory. **Learners have good opportunities to achieve additional, industry-specific qualifications.** They provide learners with additional knowledge and understanding that

help them progress in their job roles. All learners who took the commercial and shipping training (COAST) examination achieved the qualification.

9. **Achievement in key skills is unsatisfactory.** ITS has only recently started to enter learners for external tests. A comprehensive training programme has been introduced, but this has not yet had an impact on most learners.

## Quality of education and training

10. **Off-the-job training is excellent.** Learners value the flexibility of programmes and the good teaching materials. Training sessions are presented by qualified staff who have relevant experience and are highly valued by learners and employers.

11. **Learners are able to carry out additional training that helps them develop their personal skills.** They gain confidence and recognise that they have done so.

12. Support for learners is satisfactory, although there is less face-to-face contact than some learners would like. Training is valued and employers are flexible in allowing learners to complete their training programme in work time.

13. **IIS has a comprehensive process of initial assessment but its implementation is poor.** Some learners are placed on programmes that do not always correspond to their job role to enable them to fulfil the requirements of the NVQ. The organisation is not aware that the Basic Skills Agency test is not a requirement for all learners and as a result many have been tested inappropriately. None of the current learners have been identified as having additional learning needs.

14. **There are some weak assessment practices.** Learners have a limited understanding of the assessment process and are often unsure on which aspects they are being assessed. Background knowledge is sometimes presented as evidence of performance. Internal verification has not identified some important issues.

15. **Progress reviews are weak.** ITS produces a graph which shows learners the proportion of a unit they have completed, but does not focus on what is required to complete each unit. Longer-term targets are not specific enough to ensure progress towards the qualification.

## Leadership and management

16. **IIS has developed good strategies to meet the skills shortages identified in the shipping industry.** Innovative and successful projects have been used in partnership with schools to raise the profile of work-based learning and promote careers in the shipping industry. There are effective partnership arrangements with national and international professional bodies. The company has taken great care to identify and meet the skills needs of the industry.

17. **IIS has developed effective and innovative training programmes.** Extensive use is

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made of e-learning and the most up-to-date technology is used to provide training in a flexible, accessible and enjoyable way. Training resources are particularly good and the company has invested heavily in technology.

**18. ITS has taken too long to develop and implement a strategy for key skills training and assessment.** Key skills have not formed an integral part of many modern apprenticeship programmes.

**19. The quality assurance arrangements are neither effective nor complete.** There has been insufficient focus on developing policies and procedures for the key stages of the training programme. Many of the arrangements are new and have not been audited, monitored or reviewed. The systems do not identify variations in the quality of inductions, initial assessment, reviews or the use of individual training programmes. ITS has not set or monitored key performance indicators.

**20. Internal verification is not thorough.** It has not identified weaknesses in assessment practice and there has been insufficient sharing of good practice among assessors.

*The following strengths and weaknesses were identified during this inspection:*

### Leadership and management

#### Strengths

- good strategic planning to meet skills shortage in the shipping industry
- effective and innovative development of training programmes
- good initiatives to widen participation

#### Weaknesses

- late development of key skills strategy
- ineffective and incomplete arrangements for quality assurance
- insufficient targeting of equal opportunities in training

## **Retailing, customer service & transportation**

### **Strengths**

- good retention rates
- good achievement of additional, industry-specific qualifications
- excellent off-the-job training

### **Weaknesses**

- some weak assessment practices
- poor use of initial assessment
- late introduction of key skills
- weak progress reviews

## **WHAT LEARNERS LIKE ABOUT ITS TRAINING SERVICES:**

- the opportunity to broaden knowledge
- the training sessions
- the quality of learning materials
- friendly and supportive staff
- small groups
- the COAST course
- the flexibility of the programme

## **WHAT LEARNERS THINK ITS TRAINING SERVICES COULD IMPROVE:**

- some of the lectures - at times they are boring
- individual support - some learners would like more
- the amount of face-to-face support - some learners thought it was insufficient

## **KEY CHALLENGES FOR ITS TRAINING SERVICES:**

- develop the quality assurance strategy
- continue to develop key skills training and assessment
- increase learners' understanding of equal opportunities
- improve assessment and internal verification

## DETAILED INSPECTION FINDINGS

### LEADERSHIP AND MANAGEMENT

Grade 3

*The following strengths and weaknesses were identified during this inspection:*

#### Strengths

- good strategic planning to meet skills shortage in the shipping industry
- effective and innovative development of training programmes
- good initiatives to widen participation

#### Weaknesses

- late development of key skills strategy
- ineffective and incomplete arrangements for quality assurance
- insufficient targeting of equal opportunities in training

21. ITS has a clear strategy to help meet the skills shortage which has been identified in the shipping industry. This has resulted in several innovative and successful projects with local schools to help raise the profile of work-based learning and to promote careers in the shipping industry. For example, one project includes role-play exercises which simulate work in a shipping company, followed by work experience with local employers. Another project uses vocational training to engage pupils in key skills learning and to improve their attendance at school. This project has reduced absenteeism by 30 per cent. ITS has also arranged for local employers to give presentations and carry out mock interviews with year 11 pupils in order to select pupils for work experience. The company has also successfully negotiated with the approved institute to enable learners who achieve an NVQ at level 4 to gain exemption from certain modules of their professional qualification. ITS has formed productive international links with professional shipping organisations, which has successfully increased co-operation and the sharing of knowledge in the industry. As a result of meetings with local employers, ITS has designed and successfully offered short courses to fill the skills gaps identified.

22. ITS has developed innovative and effective training programmes. This vocational training has recently been expanded to include communication key skills training, and there are plans to develop training materials for the application of number, business administration and sport and recreation training programmes. The training programmes make extensive use of e-learning and current advances in technology. Learners can choose to either attend lectures or make use of video links or CD-ROMs. They can access the training materials at any time of the day and can review lecture material as many times as they like. Each lecture is accompanied by a short test which can be taken online, with or without the support of a trainer, through a video link. Chat rooms are used to allow learners to have individual training without having to attend the training centre. Extra learning materials are available on request by e-mail. All of the training

resources are good and have been developed to be enjoyable, interesting and entertaining. Learners are well motivated and enthusiastic about the off-the-job training and particularly benefit from the flexibility of e-learning.

23. ITS manages its resources efficiently. The senior partners monitor the overall budget for the company and its success in achieving the targets for recruitment and achievement by the LSC. Staffing levels are appropriate for the numbers of learners and the deployment of staff is well planned. Learning accommodation is satisfactory and the company has invested heavily in e-learning technology and equipment.

24. There are satisfactory arrangements for staff development and appraisal. The appraisal system was introduced in February 2003 and as yet it is too early to see its impact on the training programmes. Staff have an annual appraisal interview, with a review after six months. The personal development plans for staff are linked to objectives identified by ITS in the business plan and include company and personal targets. However, the current business plan is the first that the company has written for its work-based learning, and although the plan is satisfactory, it does not include targets or specify who is responsible for its implementation. At the time of inspection, the version available on the staff intranet was an incomplete draft and not the current plan. Most staff are well suited to their roles and are appropriately qualified, although a few are working towards assessor qualifications.

25. Internal and external communication are satisfactory. There is a staff intranet as well as a company website. ITS produces a monthly newsletter which includes information on learners' achievements and updates on the shipping industry. E-mail is used extensively to communicate with learners, employers, external agencies and partners. There is a range of formal and informal meetings.

26. A strategy for the provision of key skills training and assessment has only recently been implemented. ITS has recognised this weakness in its self-assessment report. ITS was not aware of the changes to the key skills standards which took place in 2000 until September 2002. The first group of learners had only taken external key skills tests shortly before the inspection. A training programme was introduced in March 2003, but so far only communication key skill training has been provided, although training for application of number is planned to start soon. Currently none of the learners have additional learning needs identified. There is a key skills diagnostic assessment, but until recently all learners also took an approved initial assessment, although this was not appropriate for them. ITS has only recently become aware that learners may take a higher key skill than that required by their apprenticeship framework.

### **Equality of opportunity**

### **Contributory grade 3**

27. ITS has good initiatives for widening participation. The senior partner has been proactive in projects to engage learners who would not traditionally have considered a career in the industry. He has targeted local schools in deprived areas to talk on the subject and is energetic and enthusiastic about giving lectures at careers events. ITS has also recently opened an office in London and will use this to broaden its base of

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employers.

28. An imaginative project with a primary school in Wapping aimed to raise the awareness of young learners of the implications of the transportation of goods from third world countries. Pupils were taken to the docks and carried out practical tasks to engage their interest. Another project with a local secondary school aimed to attract enthusiastic language learners into shipping and promoted language skills as a valuable asset. Learners for whom English was not the first language were also encouraged to consider a career in shipping.

29. The company has a clear equal opportunities policy which is issued to all learners at induction, either on disk or in hard copy. It is available in 12 languages and includes updated information on changes in legislation. There is a 24-hour telephone helpline available in many languages which also has information on how to complain. Recruitment literature has an adequate statement about ITS as an equal opportunities employer. Companies are checked to ensure they have a policy before learners are accepted. The policy is monitored during visits but the frequency of these visits is variable.

30. All staff have an induction to equal opportunities and a further training session for staff has also been developed. However, the frequency of updating sessions is not specified. The equal opportunities team of six staff meets quarterly. However, although data are collected and discussed, they do not result in target-setting. The experiences of two learners from minority ethnic groups who recently completed their training, and a recent increase in the proportion of female learners have not been sufficiently analysed or used to contribute to planning.

31. Equal opportunities is insufficiently targeted in training and many learners do not have a clear understanding of it. There is insufficient reinforcement of equal opportunities issues after induction. A case study to raise awareness of equal opportunities has been used in teaching and there are now some excellent materials for key skills which promote equal opportunities. However, as training for key skills was only implemented in March and many learners have not yet started their training, it is too early to assess the impact of this. Learners' understanding is checked during progress reviews but is ineffective as a member of the employer's staff is always present. However, ITS staff are supportive and respond promptly to issues when they arise.

### Quality assurance

### Contributory grade 4

32. ITS introduced new quality assurance arrangements in August 2003. There are policies and procedures for many aspects of the company's work. However, there has been insufficient focus on developing policies and procedures to cover the key stages of the training programmes. There are no policies or procedures which effectively assure the quality of inductions, the use of initial assessment for literacy, numeracy or key skills, the provision of training, the use of training needs analysis, or the use of individual learning plans. There has been no internal audit of the new arrangements and no evaluation or monitoring of their effectiveness at bringing about improvements. Internal

verification is not thorough enough and did not identify the poor assessment practice identified at inspection. The quality assurance arrangements did not identify the variations in the quality of inductions, progress reviews, and the use of initial assessment and individual learning plans.

33. ITS has produced excellent training materials and great care is taken to make sure that they are current and reflect best practice in the industry. However, although observation of training takes place, it is not systematic and the paperwork to record it is not appropriate. It does not help trainers to improve the quality of their training. ITS collects feedback from learners and employers, but again this is not carried out thoroughly across all aspects of the training programmes. Questions are often not detailed or specific enough to collect meaningful feedback which could be used to improve the quality of the programmes.

34. The quality assurance project team meets every six months and in March 2002 effective action was taken to reduce the number of early leavers. However, although retention continued to be monitored at contract review, there was no continued systematic monitoring of the new arrangements for recruitment by the project team. The new procedures for staff appraisal include a record of each assessor's learners and the date on which they are expected to achieve their NVQ. However, review of the learners' progress was not carried out at the six-monthly reviews of each assessor's personal targets.

35. The action plans which result from quality assurance project team meetings and the analysis of learners' and employers' feedback have insufficient detail and targets for completion. They do not allocate responsibility or indicate how success will be recognised or monitored.

36. There has been insufficient use of data or monitoring of performance over time to identify trends or set targets for improvement. ITS has not identified key performance indicators and the quality assurance procedures are not coherent.

37. The latest self-assessment report was updated in May 2003. However, it is insufficiently self-critical. It over-estimated the strengths of the company and did not identify key weaknesses identified at inspection. It has insufficient evidence to support the judgements it makes.

## AREAS OF LEARNING

### Retailing, customer service & transportation

Grade 3

Programmes inspected	Number of learners	Contributory grade
Work-based learning for young people	65	3

*The following strengths and weaknesses were identified during this inspection:*

#### Strengths

- good retention rates
- good achievement of additional, industry-specific qualifications
- excellent off-the-job training

#### Weaknesses

- some weak assessment practices
- poor use of initial assessment
- late introduction of key skills
- weak progress reviews

### Achievement and standards

38. All learners attend additional, industry-specific training for the COAST qualification. Entry for the examination is optional but 21 per cent of current learners have taken the examination and all have achieved the qualification. Learners have access to a range of qualifications which include the airfreight integrated modules shipping and forwarding introduction programme and the dangerous goods awareness certificate. These provide learners with additional knowledge and understanding which helps them to progress in their job roles.

39. There has been an improving trend in retention rates for advanced modern apprentices over the past two years. All learners who started the programme in 2002-03 are still in learning. Retention rates are good for foundation modern apprentices. Ninety-three per cent of those who started in 2002-03 have been retained or are still in learning. Retention continues to be good on NVQ programmes, although it has declined steadily over the three-year period from 1999 to 2002.

40. Achievement rates are satisfactory on all programmes. There was a decline in achievement for advanced modern apprentices who started in 2000-01, but those who enrolled in 2001-02 are making satisfactory progress. There has been a decline in achievement on NVQ programmes over the three-year period from 1999 to 2002.

41. Achievement of key skills is unsatisfactory. Some learners had only recently begun, or had yet to begin their key skills training. A comprehensive training programme has

been planned but has not yet been fully implemented. A member of staff has been appointed as co-ordinator to develop and deliver the training and the organisation has acquired up-to-date specifications for learners. However, it is too early to assess the impact of these developments and many learners have yet to start working on their key skills qualifications.

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

LSC funded work-based learning																
Advanced modern apprenticeships (AMA)																
	2002-03		2001-02		2000-01		1999-2000									
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
Number of starts	7		30		30		11									
Retained*	0		2		6		8	73								
Successfully completed	0		2		6		8	73								
Still in learning	7		20		6		0	0								

\*retained learners are those who have stayed in learning for at least the planned duration of their training programmes, or have successfully completed their programme within the time allowed

LSC funded work-based learning																
Foundation modern apprenticeships (FMA)																
	2002-03		2001-02		2000-01											
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
Number of starts	27		5		3											
Retained*	2		0		1	33										
Successfully completed	2		0		1	33										
Still in learning	23		4		0	0										

\*retained learners are those who have stayed in learning for at least the planned duration of their training programmes, or have successfully completed their programme within the time allowed

LSC funded work-based learning																
NVQ Training																
	2001-02		2000-01		1999-2000											
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
Number of starts	34		17		17											
Retained*	19		13	76	16	94										
Successfully completed	19		13	76	16	94										
Still in learning	5		0	0	0	0										

\*retained learners are those who have stayed in learning for at least the planned duration of their training programmes, or have successfully completed their programme within the time allowed

### **Quality of education and training**

42. The off-the-job training is excellent. ITS has developed a structured programme of relevant lectures and seminars and all the training resources are very good. Fully electronic training is available. Learners value the flexibility of programmes and the excellent quality of training materials. They are provided with a CD-ROM so that they can access lectures in their own time. They can attend training sessions either at the provider's premises or in the workplace. Current copies of regulations and codes of practice are also used as visual and practical aids to learning. Comprehensive, good-quality handouts are provided to support professional presentations. Training sessions are valued by learners and employers and are presented by qualified staff who have relevant experience.

43. Learners have good opportunities to follow additional courses that help them to develop their personal skills. Although many learners choose not to take the qualification, they develop understanding and knowledge that is valued by employers. As a result, they grow in confidence and self-esteem and value the learning experience.

44. The learners' induction is satisfactory. Induction takes place either in the workplace or at the ITS training centre. Assessors introduce learners to the qualification framework, the content of NVQs and key skills and the assessment process. Health and safety, equal opportunities and the qualification appeals procedure are also discussed, based on handouts. However, many learners are not able to recall their induction in much detail.

45. Support for learners is satisfactory. Assessors visit learners in the workplace although there is less face-to-face contact than some learners would like. Many learners have frequent contact and support from their assessor by telephone and e-mail. Support from employers is satisfactory with some employers giving good personal and practical support. Employers value the quality of training and learners are allowed time to attend lectures and to complete their work.

46. ITS has a comprehensive initial assessment process, but its implementation is poor. All learners complete a key skills assessment and a training needs analysis. However, the results are not always used to identify the most appropriate apprenticeship programme or to ensure that the learner's job role allows them to fulfil the requirements of the NVQ. In some cases, employers arrange project work or job rotation to overcome this. In other cases, learners are unable to gain appropriate evidence. In particular, learners are unable to show evidence of competence in the management units of the NVQ at level 3 if they are not in a supervisory role. The use of a formal literacy and numeracy test was only implemented very recently. The organisation was not aware that testing was not a requirement for all learners and it has been used inappropriately. Currently, none of the learners have been identified as needing additional learning support.

47. Although some aspects of assessment on programme are satisfactory, there is some poor practice. There is a narrow range of evidence in some portfolios. Learners have a poor understanding of the assessment process and are not encouraged to present

individual evidence. Assessment planning for observations is not carried out with reference to the standards and learners are unsure which aspects of their performance are to be assessed. Insufficient feedback is given and recorded after the observation to record the level of competence achieved. There is insufficient observation of performance by some assessors. Supervisors do not confirm learners' personal statements and there is insufficient use of witness testimony from supervisors or colleagues to confirm that work activities are performed effectively by learners, over a period of time and at a level appropriate for the qualification. Some of the evidence used is paperwork from the background knowledge sessions. Employers' company policies and procedures and job descriptions are sometimes used as evidence of performance. Internal verification has not identified these problems.

48. Progress reviews are weak. Although good use is made of short-term target-setting, few longer-term targets are set and they are not specific enough to ensure good progress towards the qualification. ITS produces a progress graph which indicates the proportion of each unit the learner has completed, but it does not focus on what is specifically required to complete the unit. The review does not revisit individual learning plans and these plans are not used routinely at reviews. Employers are not always present and when they are it is not always the learners' immediate supervisor. As a result, supervisors are rarely involved in the planning of the learners' training or in the collection of suitable evidence. Equality of opportunity is not discussed in any detail at progress reviews and questions on the review form do not encourage discussion of the topic.

## **Leadership and management**

49. There is a strong commitment by the management of ITS to improving learners' knowledge of the industry and their job prospects within it. However, the focus is at strategic level rather than on the practical aspects of training. ITS realised that NVOs were not giving learners comprehensive coverage of the industry and developed an outstanding training scheme. However, the NVO training processes are not developed to the same level. Equality of opportunity is not sufficiently promoted in the training. It is discussed at induction, but learners have little understanding of its significance. It is rarely discussed after induction, although ITS has recently devised a training session for learners. Learners have a basic understanding of the complaints and appeals procedures. There are insufficient quality assurance arrangements to ensure the integrity of the assessment process, and internal verification is not planned to cover all aspects needed to meet regulatory requirements. The standards and assessment guidance used for the qualifications involved have not been revised in recent years. In some areas their requirements do not reflect current industry practice. There are no established procedures to assure the quality of the key stages of the training process and consequently they are not always carried out consistently.