

# BRITISH ACCREDITATION COUNCIL INSPECTION REPORT

## Short Course Provider (SCP) Re-accreditation Inspection

**NAME OF PROVIDER:** Bruton Lloyd LLP

**ADDRESS:** 43 Berkeley Square  
London  
W1J 5AP

**HEAD OF INSTITUTION:** Ms Anna Kunitsyna and Ms Ekaterina Ametistova

**DATE OF INSPECTION:** 28 August & 14 September 2018

**ACCREDITATION STATUS AT INSPECTION:** Accredited

### DECISION ON ACCREDITATION:

- Re-accreditation awarded for the full four-year period
- Probation accreditation
- Decision on accreditation deferred
- Award of accreditation to be withdrawn

DATE: 29 November 2018

## PART A – INTRODUCTION

### 1. Background to the provider

Bruton Lloyd (the Provider) is a privately owned organisation, with two partners who are also the co-founders and Managing Directors of the company. The partnership was originally established in October 2006 under the name of Address Anglia LLP and this was changed to Bruton Lloyd LLP in April 2011 to provide a more anglicised name. The Directors are supported by the Head of Tuition, Tutor Manager, the Accountant, who is also an administrator, and the Marketing Communications Manager.

The overall aim of the Provider is to provide one-to-one tuition and bespoke management service for clients, predominantly from Russia, who are seeking educational progression for their children in the United Kingdom (UK). The Provider helps families to navigate the British education system with an emphasis on educational consulting and project management. The services offered include tailored tuition for students across all academic subjects, such as English, Mathematics and the Sciences, with particular emphasis given to assisting parents and children in securing suitable schools and university placements in the UK. The Provider has close links in Russia and works very closely with an agent based in Moscow.

Bruton Lloyd operates from a central London administrative office, where some face-to-face tuition takes place and online tuition is delivered by online video conferencing. The Provider makes use of a residential home-stay study centre in Norfolk. The owner of the study centre also facilitates the provision of one-to-one tuition for the students whilst they are at his Norfolk premises. He is the Summer Educational Programme Manager.

### 2. Brief description of the current provision

Bruton Lloyd works closely with its clients to provide a bespoke one-to-one service. This is tailored specifically for the needs of the participant involved and the educational experience they intend to progress to, whether at an independent public school or university. At present, the provision includes personal tuition within the UK and online tuition which is provided from the UK to participants based overseas. The tuition includes preparation for entrance examinations and interviews.

Emphasis is also placed on the cultural assimilation of the participant to include an awareness of British life, traditions, values and etiquette. Accompanying adults, such as parents, can also be provided with bespoke training to meet their needs. This training may include skills such as archery or a session in the everyday use of the English language. The summer programme that takes place in Norfolk provides a high quality home-stay educational experience for the participants.

The Norfolk summer programme is designed for participants aged between 11 and 18, all of whom are Russian or Ukrainian nationals. During the time of the inspection, only one participant, who was under the age of 18 and of Russian origin, was enrolled on the summer programme in Norfolk.

Advisory services offered by Bruton Lloyd are in the form of conducting independent academic assessments for participants aged between 7 and 17, liaising with schools, attending parents' and teachers' meetings on behalf of parents based overseas. However, this does not form part of BAC's accreditation.

They have been members of the Tutors' Association since 2017 and have been an accredited centre for UKiset examinations since 2015.

### 3. Inspection process

The inspection was carried out by one inspector over two days. Meetings took place with both Directors, the residential accommodation host based in Norfolk, the administrators, team leaders, teachers and the participant. The first day was spent at the Norfolk venue where discussions were held with the Summer Education Programme Manager, the two tutors and the participant. Two lesson observations were undertaken. Various documentation was scrutinised. The second day was spent in the London office at Berkeley Square. Interviews were held with both the partners of Bruton Lloyd and with the administrators and academic managers. Tours of both premises were carried out. The availability of the information provided was good and the organisation co-operated well with the inspector throughout the inspection.

### 4. Inspection History

<b>Inspection Type</b>	<b>Date</b>
Stage 2 inspection	28 - 30 April 2014
Stage 3	23 & 28 July 2014
Interim	7 July 2015

## PART B - JUDGMENT AND EVIDENCE

The following judgments and comments are based upon evidence seen by the inspector(s) during the inspection and from documentation provided by the organisation.

### INSPECTION AREA - MANAGEMENT, STAFFING AND ADMINISTRATION

#### 1. The provider is effectively managed

- |     |   |   |                             |
|-----|---|---|-----------------------------|
| 1.1 | The management structure is clearly defined, documented and understood, including the role and extent of authority of any owners, trustees or governing body.                 | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 1.2 | The head of the provider and other senior managers are suitably qualified and experienced, understand their specific responsibilities and are effective in carrying them out. | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 1.3 | There are clear channels of communication between the management and staff and those working at the delivery venue/s.   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

This standard is judged to be:

Met  Partially Met  Not Met

#### Comments

The Institution has a clearly defined management structure. This is documented by means of an accurate organisation chart that clearly sets out the staff hierarchy and job roles. The programmes on offer are clearly defined in the organisation chart.

The management structure at the London office is well planned and effective, with the two partners being actively involved in the organisation. They are both very highly qualified and hold a clear vision for Bruton Lloyd. They are very supportive of their team and work hard to ensure all the staffing needs of the Provider are met.

All roles and responsibilities are understood and these are documented in the job descriptions for full and part-time staff and terms of agreement for freelance staff. The home-stay staff at Norfolk are adequately qualified and speak English and Russian fluently. All staff at the head office in London are graduates and also speak English and Russian.

Effective channels of communication between the management and staff in the London office include regular face-to-face meetings, telephone calls and e-mails. Communication between the staff in London and the accommodation host in Norfolk is effectively recorded by means of schedules, agendas and action plans.

#### 2. The administration of the provider is effective

- |     |   |   |  |
|-----|---|---|--|
| 2.1 | Administrators are suitably qualified or experienced and understand their specific responsibilities and duties. | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            |
| 2.2 | The size of the administrative team is sufficient to ensure the effective day-to-day running of the provider.   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            |
| 2.3 | The administrative support available to the management is clearly defined, documented and understood.           | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            |
| 2.4 | Policies, procedures and systems are well documented and effectively disseminated across the provider.          | <input type="checkbox"/> Yes            | <input checked="" type="checkbox"/> No |
| 2.5 | Data collection and collation systems are effective.  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No            |

This standard is judged to be:

Met  Partially Met  Not Met

#### Comments

Staff based at the London office are experienced and well-integrated into the professional ethos of the organisation. Information is effectively networked around the office so that all can respond to any enquiry.

The size of the administration team is appropriate to support the current numbers of freelance teaching staff and students prior, during and post course delivery. It is also sufficient for the day-to-day running of the Provider. The two office rooms used in London mean that communication between the staff is excellent.

Policies and procedures relating to staff responsibilities are adequate and comprehensive.

2.4 However, these policies are not currently reviewed and updated regularly to ensure relevancy, validity and accuracy. They are not effectively disseminated across the institution especially to the accommodation host in Norfolk.

Data collection and collation systems are effective and policies comply with up-to-date data protection regulations.

**3. The provider employs appropriate managerial and administrative staff**

3.1 There are appropriate policies and effective procedures for the recruitment and continuing employment of suitably qualified and experienced staff.  Yes  No

3.2 Experience and qualifications claimed are verified before employment.  Yes  No

3.3 There is an effective system for regularly reviewing the performance of staff.  Yes  No

**This standard is judged to be:**

Met  Partially Met  Not Met

**Comments**

The Provider has an appropriate staff recruitment policy including for all freelance teaching staff.

Staff files show that the appropriate recruitment processes are followed, including the take-up of references. The staff are all well qualified with graduate qualifications and language skills that enable them to deal effectively with clients in London and in Moscow.

There is an effective system for reviewing the performance of managerial and administrative staff. Reviews are undertaken by the two directors at head office.

**4. Publicity material, both printed and electronic, gives a comprehensive, up-to-date and accurate description of the provider and its programmes**

4.1 Text and images provide an accurate depiction of the provider's location, premises, facilities and the range and nature of resources and services offered.  Yes  No

4.2 Information on the courses available is comprehensive, accurate and up-to-date.  Yes  No

**This standard is judged to be:**

Met  Partially Met  Not Met

**Comments**

The Institution has excellent quality publicity material. The brochures for the Norfolk summer school provide excellent photographs giving a clear indication of what is being offered to clients.

The website is detailed and comprehensive and is reviewed and updated regularly to ensure it remains up-to-date.

All publicity resources are reviewed and updated on a regular basis. Publicity materials are professional and include accurate representations of the Provider and the services offered. All publicity material is available in both English and Russian.

**5. The provider takes reasonable care to recruit and enrol suitable participants for its courses**

- 5.1 Entry requirements for each course, including those relating to language ability, are set at an appropriate level and clearly stated in the course descriptions seen by prospective participants.  Yes  No  NA
- 5.2 A formal application process ensures that participants meet the entry requirements and any claimed qualifications are verified.  Yes  No  NA
- 5.3 The provider replies to all application enquiries promptly and appropriately and briefs all stakeholders properly on the nature and requirements of its programmes.  Yes  No  NA
- 5.4 Any overseas recruitment agents are properly selected, briefed, monitored and evaluated.  Yes  No  NA

**This standard is judged to be:**  Met  Partially Met  Not Met

**Comments**

The Institution is highly committed to ensure that participants are enrolled on the right course and the right level that meets their needs and requirements and effectively aids their progression

Entry requirements for programmes are set at an appropriate level and discussed with participants and their parents prior to application interviews so that they are clear about the offer.

Participants and their guardians are in regular contact with the Provider prior to, during and post the application process. They are kept informed of the progress of their application throughout the enquiry process.

The experienced consultants work with the parents and participants to ensure that realistic aspirations are met. Every tuition programme is individually tailored to the requirements of the family and is always conducted at an appropriate level.

There is only one agent in Moscow who has been working with the Provider since its inception and who is thoroughly familiar with the recruitment process as he engages with the Provider on a regular basis.

**6. There is an appropriate policy on participant attendance and effective procedures and systems to enforce it**

- 6.1 There is an appropriate, clear and published policy on participant attendance and punctuality.  Yes  No
- 6.2 Accurate and secure records of attendance and punctuality at each session are kept for all participants, collated centrally and reviewed.  Yes  No  NA
- 6.3 Participant absences are followed up promptly and appropriate action taken.  Yes  No  NA

**This standard is judged to be:**  Met  Partially Met  Not Met

**Comments**

The participant handbook specifies attendance and punctuality requirements which are appropriate.

The Norfolk summer programme is a home stay programme where participants live and receive one-to-one tuition in the home. Therefore, attendance is 100 per cent.

For the tailored hourly tuition at the office in London, attendance records are kept on file and tracked by staff on a daily basis.

**7. The provider regularly obtains and records feedback from participants and other stakeholders and takes appropriate action where necessary**

- |     |   |   |
|-----|---|---|
| 7.1 | The provider has effective mechanisms for obtaining feedback from participants and other stakeholders (such as staff, partner providers and employers) on all aspects of the provider's provision, including formal participant representation where appropriate. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No                             |
| 7.2 | Feedback is obtained, recorded and analysed on a regular basis.   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No                             |
| 7.3 | The feedback is reviewed by management and action is taken where necessary.   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No                             |
| 7.4 | There is a mechanism for reporting on the provider's response to the feedback to the participant body.  | <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA |

**This standard is judged to be:**

Met  Partially Met  Not Met

**Comments**

The Provider has effective methods for obtaining feedback, for example, feedback sheets and questionnaires. Staff are highly committed to using feedback to aid improvements. This was confirmed by staff and the participant.

Opinions and views gained from collecting feedback from parents and participants are used to enhance provision and for improving the programmes on offer. A standard list of questions is used to gather feedback from parents on an ongoing basis which is used to direct future improvements.

Both the partners make good use of a very interactive approach which allows staff and teachers to offer feedback at any stage in the training programme. This is highly effective in aiding the implementation of immediate improvements.

All feedback is analysed by the Provider to improve operating systems and to provide better quality tuition. Feedback analysis reports are clearly documented and stored safely in the offices in London.

Feedback is also used effectively in promotional events and presentations in Moscow and London.

**8. The provider has effective systems to review its own standards and assess its own performance with a view to continuing improvement**

- |     |  |   |
|-----|--|---|
| 8.1 | There are effective systems for monitoring and periodically reviewing all aspects of the provider's performance. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 8.2 | Reports are compiled which present the results of the provider's reviews and incorporate action plans.           | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 8.3 | Action plans are implemented and regularly reviewed.   | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

**This standard is judged to be:**

Met  Partially Met  Not Met

**Comments**

Both Directors are responsible for reviewing all aspects of the Provider's performance. The reporting system used is based on a strong reflective procedure. The findings in the report from the summer programme are incorporated into the recorded action plans in order to assess the quality standards with a view to continuing improvement.

The compiled feedback and reviews of the feedback results are discussed with the Summer Education Programme Manager in Norfolk on a regular basis to ensure satisfactory outcomes for the whole provision.

Action plans are implemented where required to improve performance.

## INSPECTION AREA – TEACHING, LEARNING AND ASSESSMENT

### 9. Programme management is effective

- |     |   |   |                             |                             |
|-----|---|---|-----------------------------|-----------------------------|
| 9.1 | There is a suitably qualified and experienced programme manager or management team with responsibility for teaching, learning and assessment and the management of the body of trainers | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 9.2 | Classes are timetabled and rooms allocated appropriately for the courses offered.   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 9.3 | The allocation of trainers to classes provides for a consistent learning experience and delivery is monitored to ensure consistency.  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 9.4 | There is an appropriate policy and effective procedures for the acquisition of academic resources.  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |

This standard is judged to be:

Met  Partially Met  Not Met

#### Comments

The academic management is highly effective. All members of staff are highly qualified and experienced to manage the team of freelance teachers well. They are fluent in both English and Russian and are, therefore, able to take the lead on the programmes on offer very effectively.

The team at Norfolk have suitable experience in identifying and meeting the needs of the participants and their guardians or parents.

Each participant receives an individually tailored timetable which is monitored for relevancy by Bruton Lloyd staff.

No more than three participants are accommodated at any given time in Norfolk. Each participant receives individual tuition. The team at Norfolk supervise the process and ensure consistency in teaching and learning by conducting lesson observations, staff meetings, and standardisation meetings. All lessons are clearly timetabled and planned effectively, with appropriately allocated start and end times and breaks. The participant at Norfolk confirmed that he was happy with the planning and delivery of the lessons and that they met his needs.

There is a suitable resource base of books, journals and workbooks which is sufficient to support learning effectively.

### 10. The courses are planned and delivered in ways that enable participants to succeed

- |      |   |   |                             |  |
|------|---|---|-----------------------------|--|
| 10.1 | Courses are designed and delivered in ways that allow participants to develop the knowledge and skills which will be required for final examinations or assessments or which meet stakeholders' requirements. | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA            |
| 10.2 | Lessons and assessments maintain an appropriate focus on any assessment objectives or statement of learning outcomes established by the awarding body.  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA            |
| 10.3 | Formative assessments appropriately reflect the nature and standards of summative examinations.   | <input type="checkbox"/> Yes            | <input type="checkbox"/> No | <input checked="" type="checkbox"/> NA |
| 10.4 | Participants are encouraged and enabled to develop independent learning skills.   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA            |
| 10.5 | The academic backgrounds and particular needs of participants are taken into account in the classroom delivery of the course.   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |  |

This standard is judged to be:

Met  Partially Met  Not Met

#### Comments

As all programmes are designed to meet the needs of each participant. Appropriate tutors are selected to help develop the skills and knowledge needed in order for the participant to achieve their goal. This may be for a general improvement in English language skills or readiness for a particular entrance examination.



Assessments are ongoing with the participant receiving feedback after each session. There are no formal summative exams.

Lessons and assessments focus on the individual needs of each participant. One of the aims is to help participants become independent learners. The participant at Norfolk confirmed the extent to which he had progressed and become more confident and independent since enrolling with the Provider.

The academic backgrounds and particular needs of the participants are taken into account in lesson delivery. All lesson plans include details of the participants' backgrounds and learning needs.

**11. Trainers are suitable for the courses to which they are allocated and effective in delivering them**

- |      |  |   |  |
|------|--|---|--|
| 11.1 | Trainers are appropriately qualified and experienced.  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No  |
| 11.2 | Trainers have a level of subject knowledge, pedagogic and communicative skill which allows them to deliver the content of courses effectively.                         | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No  |
| 11.3 | The appraisal procedures for trainers incorporate regular classroom observation.   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No  |
| 11.4 | Trainers are supported in their continuing professional development and enabled to develop further pedagogic techniques to enhance the learning of participants.       | <input type="checkbox"/> Yes            | <input type="checkbox"/> No <input checked="" type="checkbox"/> NA |
| 11.5 | Trainers respond to different learning needs of participants where appropriate, taking various learning styles into account in their planning and delivery of lessons. | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No  |
| 11.6 | Trainers employ effective strategies to involve all participants in active participation and to check their understanding of concepts and course content.              | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No  |

**This standard is judged to be:**

Met     Partially Met     Not Met

**Comments**

Tutors used are experienced and have the necessary qualifications to teach the subject. There is a clearly documented teacher recruitment policy in place. Teachers are contracted based on demand.

In Norfolk, the Summer Educational Programme Manager has a bank of tutors to call upon when planning to meet the needs and requirements of the participants. Such planning is carried out well in advance of the participants arriving.

Classroom observations are conducted by the Norfolk team and all lessons are regularly observed. The tutors are all experienced in providing educational services and are self-employed. They are recruited for a few weeks each year, according to demand. The Provider does not directly support tutors' continuing professional development but expects to see evidence of it in their curriculum vitae (CVs). Tutors are expected to be competent in their subject area. All tutors are also employed in schools and colleges where they undergo continuous and ongoing professional development. Records of tutors' CVs are securely stored in the London office. Tutors are expected to be proactive regarding their own professional development. This includes professional development in teaching and learning as well as updating their own skills and qualifications in their specialist subject areas.

All teachers are highly knowledgeable in their subject area. In the classes observed, tutors employed a range of teaching and learning techniques, which engaged and motivated the participant. Effective techniques, such as in-depth questioning, are used extensively to assess understanding and learning. Resources used, for example, worksheets, workbooks, puzzles and journals, actively involved the participant.

**12. The provider provides participants and trainers with access to appropriate resources and materials for study**

This standard is judged to be:

Met  Partially Met  Not Met

**Comments**

The Directors and the Summer Educational Programme Manager based in Norfolk work closely with all teaching staff to ensure that any resource requirements such as books, worksheets, laptops and journals are effectively identified and provided in advance of any lessons.

The tutors also bring their own materials with them but there are some useful resources at Norfolk which the participants have access to.

Teachers and the participant confirmed that the resources supplied meet their needs and are adequate.

**13. Participants receive appropriate assessment and feedback on their performance and progress, which are effectively monitored**

- |      |   |   |   |
|------|---|---|---|
| 13.1 | Feedback is given to individual participants tailored to meet their specific needs and constructive in its nature and delivery.                                       | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No                             |
| 13.2 | Courses are planned to include a schedule of assessments, the procedures and criteria for which are available in writing and in advance to participants and trainers. | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No <input type="checkbox"/> NA |
| 13.3 | Assessment outcomes are monitored to enable the identification of participants who are not making satisfactory progress and prompt intervention where appropriate.    | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No <input type="checkbox"/> NA |
| 13.4 | Participants are made aware of how their progress relates to their targeted level of achievement.   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No <input type="checkbox"/> NA |
| 13.5 | Additional support or advice on alternative courses is provided to participants who are judged not to be making sufficient progress to succeed.                       | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No <input type="checkbox"/> NA |
| 13.6 | Participants have appropriate access to trainers outside class time.  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No <input type="checkbox"/> NA |

This standard is judged to be:

Met  Partially Met  Not Met

**Comments**

The emphasis on individual teaching means that there is continuous feedback provided to the participants. Progress reports are given to the parents.

Participants are aware of their progress and how it relates to their targeted level of achievement. They have regular formal and informal meetings with the teachers, the Summer Education Programme Manager at Norfolk and the course leaders where appropriate. Where there is a target examination, such as an entrance examination, mock tests are regularly used effectively to check progress.

The Provider has clear and documented policies regarding academic malpractice. Participants and teachers have access to these in the associated handbooks.

Participants have appropriate access to teachers outside class time. The participant confirmed that he received regular ongoing feedback on his progress and this is formally recorded.

**14. The provider offers courses leading to accredited awards granted by recognised awarding bodies wherever appropriate**

This standard is judged to be:

Met  Partially Met  Not Met  NA

Comments

**15. There is a clear rationale for courses leading to unaccredited or internal awards (this does not apply to the provision of certificates of attendance only)**

- 15.1 There is a clear statement of the level claimed relative to the RQF and evidence that participants who receive the award meet the stated requirements for that level.  Yes  No  NA
- 15.2 There is evidence of the extent to which the awards are accepted for the purposes of employment or further study.  Yes  No  NA
- 15.3 External moderators are involved in the assessment process where appropriate.  Yes  No  NA

This standard is judged to be:

Met  Partially Met  Not Met  NA

Comments

**16. There are satisfactory procedures for the administration of examinations and other means of assessment**

- 16.1 The provider complies with the requirements of the relevant awarding bodies in terms of examination security and administration.  Yes  No  NA
- 16.2 For internal assessments and awards, there are effective systems in place for examination security and administration, and clear procedures for participants to appeal against their marks.  Yes  No  NA

This standard is judged to be:

Met  Partially Met  Not Met  NA

Comments

The centre in London is a designated UKiset examination centre for students. The UKiset independent schools' entry test is an online test for students with English as a second language.

The centre meets all requirements in terms of examination security and administration. There are clear procedures for participants to appeal against their marks.

**INSPECTION AREA - PARTICIPANT WELFARE**

**17. Participants receive pastoral support appropriate to their age, background and circumstances**

- 17.1 There is at least one named staff member responsible for participant welfare who is suitably trained, accessible to all participants and available to provide advice.  Yes  No  NA
- 17.2 Participants receive appropriate advice before the start of the programme.  Yes  No

17.3	Participants receive an appropriate induction and relevant information at the start of the programme.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
17.4	Participants are issued with a contact number for out-of-hours and emergency support.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> NA
17.5	The provider has policies in place to avoid discrimination and a published procedure for dealing with any abusive behaviour.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
17.6	Effective safeguarding arrangements are in place and are regularly reviewed to keep all participants safe.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No <input type="checkbox"/> NA
17.7	Effective arrangements are in place to protect participants from the risks associated with radicalisation and extremism.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

**This standard is judged to be:**

Met  Partially Met  Not Met

**Comments**

At the London office there is a named staff member responsible for participant welfare and, at the Norfolk centre, the homestay host family caters for the welfare needs of the participant.

Participants receive appropriate advice and guidance on the programme before the start date to enable them to make choices as to the kind of care and support they require during their time in the UK.

Induction is thorough, relevant and is provided at the start of the programme in both English and Russian.

Students are given emergency contact numbers.

Policies to avoid discrimination and for dealing with any abusive behaviour are clearly accessible in both the participant and staff handbooks

The Directors are in charge of safeguarding and responsible for ensuring that all staff are appropriately trained. There is a clear and detailed safeguarding policy which has been made available and is accessible to all staff. All key staff have been trained to the appropriate level.

17.6 While there are plans to train all staff in safeguarding, this training has not yet been carried out.

17.6 Appropriate Disclosure and Barring Service (DBS) checks, have not been carried out for all staff prior to their appointment or prior to the start of their unregulated unsupervised activities. Enhanced DBS checks for the Summer Educational Programme Manager/host family in Norfolk have been carried out but need to be updated.

Arrangements to protect students from the risks associated with radicalisation and extremism are adequate. An appropriate policy is contained in the staff and participant handbooks.

**18. International participants are provided with specific advice and assistance**

18.1	International participants receive appropriate advice before their arrival on travelling to and staying in the UK.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
18.2	International participants receive an appropriate induction upon arrival covering issues specific to the local area.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
18.3	Information and advice specific to international participants continues to be available throughout the course of study.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
18.4	Provision of support takes into account cultural and religious considerations.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

**This standard is judged to be:**

Met  Partially Met  Not Met  NA

## Comments

Advice and guidance is given to participants in both English and in Russian. The handbook provided is very good and contains useful information that students need before arriving in the UK. It contains comprehensive information on their accommodation as well as the places they will be visiting and their course.

Where possible students have access to speakers of their own first language.

Appropriate consideration is given to cultural and religious preferences, for example, in relation to dietary requirements.

## 19. The fair treatment of participants is ensured

- |      |   |   |                             |
|------|---|---|-----------------------------|
| 19.1 | Participants apply for and are enrolled on courses under fair and transparent contractual terms and conditions.           | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 19.2 | Participants have access to a fair complaints procedure of which they are informed in writing at the start of the course. | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 19.3 | Participants are advised of BAC's own complaints procedure.   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

This standard is judged to be:

Met  Partially Met  Not Met

## Comments

There is a clearly documented, fair and transparent application and enrolment process and a well explained and fair refund policy.

The contracts with participants are appropriate and agreed between the parents of the participant and Bruton Lloyd. Very often the participant is accompanied by their parents. The contract covers the responsibilities of the Provider and of the participant and their parents.

The participant interviewed confirmed that he was treated fairly and that the Provider considers his health and safety to be of the highest importance.

## 20. Where residential accommodation is offered, it is fit for purpose, well maintained and appropriately supervised

- |      |  |                              |                             |                             |
|------|--|------------------------------|-----------------------------|-----------------------------|
| 20.1 | Any residential accommodation is clean, safe and of a standard which is adequate to the needs of participants.                                       | <input type="checkbox"/> Yes | <input type="checkbox"/> No |                             |
| 20.2 | Any residential accommodation is open to inspection by the appropriate authorities, including Ofsted where participants under 18 are accommodated.   | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 20.3 | Clear rules and fire, health and safety procedures are in place, with appropriate precautions taken for security of participants and their property. | <input type="checkbox"/> Yes | <input type="checkbox"/> No |                             |
| 20.4 | A level of supervision is provided appropriate to the needs of participants.   | <input type="checkbox"/> Yes | <input type="checkbox"/> No |                             |
| 20.5 | Separate accommodation blocks are provided for participants under 18.  | <input type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |

This standard is judged to be:

Met  Partially Met  Not Met  NA

## Comments

**21. Where home-stay accommodation is organised, the welfare of participants is ensured and the provider's relationship with hosts is properly managed**

- |      |   |   |                             |
|------|---|---|-----------------------------|
| 21.1 | Due care is taken in selecting home-stay accommodation which both provides a safe and comfortable living environment for participants and is appropriately located for travel to the provider and back. | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 21.2 | Any home-stay accommodation is inspected before participants are placed and is subject to regular re-inspection by a responsible representative or agent of the provider.                               | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 21.3 | The provider has appropriate contracts in place with any hosts, clearly setting out the rules, terms and conditions of the provision.   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 21.4 | Appropriate advice and support is given to both hosts and participants before and during the placement.   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| 21.5 | Clear monitoring procedures are in place with opportunities for participant feedback and prompt action taken in the event of problems.  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

**This standard is judged to be:**

Met  Partially Met  Not Met  NA

**Comments**

The home-stay accommodation in Norfolk, which is set within several hectares of land, forms an important part of the participant's overall experience in the UK. It has been fully inspected by the staff of Provider. The last site visit was on 22 January 2018.

Bruton Lloyd has appropriate contracts with the owner of the residential home-stay study centre in Norfolk, clearly setting out the rules, terms and conditions of the provision. Personnel from the office in London visit Norfolk regularly in order to undertake an inspection of the premises.

Appropriate advice and support are given to both hosts and participants before and during the placement.

Clear monitoring procedures are in place with opportunities for participant feedback and prompt action taken in the event of any problems.

**22. The provider provides an appropriate social programme for participants and information on leisure activities in the area**

- |      |  |   |   |
|------|--|---|---|
| 22.1 | Participants are provided with appropriate information on opportunities for participation at events and other leisure activities which may be of interest. | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No                             |
| 22.2 | The social programme is responsive to the needs and wishes of participants.  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No <input type="checkbox"/> NA |
| 22.3 | Any activities within the social programme have been chosen with consideration for their affordability by the majority of participants.                    | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No <input type="checkbox"/> NA |
| 22.4 | Any activities organised by the provider are supervised by a responsible representative with suitable qualifications and experience.                       | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No <input type="checkbox"/> NA |

**This standard is judged to be:**

Met  Partially Met  Not Met  NA

**Comments**

The social programmes are very good and are designed to meet the social, cultural and sporting interests and needs of the participants. They provide a good balance to the academic side of the programme and add to the development of the social skills of the participants.

Visits to historical sites in and around London are arranged by the Provider on request.

All activities take place either under supervision by the staff in Norfolk or the participants' parents.

## INSPECTION AREA – PREMISES AND FACILITIES

### 23. The provider has secure possession of and access to its premises

23.1 The provider has secure tenure on its premises.  Yes  No  NA

23.2 Where required, the provider has access to suitable external premises for academic or non-academic purposes of a temporary or occasional nature.  Yes  No  NA

**This standard is judged to be:**  Met  Partially Met  Not Met

#### Comments

Bruton Lloyd offices in London are leased.

The homestay property in Norfolk is owned by the Summer Educational Programme Manager.

### 24. The premises provide a safe, secure and clean environment for participants and staff

24.1 Access to the premises is appropriately restricted and secured.  Yes  No

24.2 The premises are maintained in an adequate state of repair, decoration and cleanliness.  Yes  No

24.3 There are specific safety rules in areas of particular hazard (e.g. science laboratories), made readily available to participants, staff and visitors.  Yes  No  NA

24.4 General guidance on health and safety is made available to participants, staff and visitors.  Yes  No

24.5 There is adequate signage inside and outside of the premises and notice boards for the display of general information.  Yes  No

24.6 There is adequate circulation space for the number of participants and staff accommodated, and a suitable area in which to receive visitors.  Yes  No

24.7 There are toilet facilities of an appropriate number and level of cleanliness.  Yes  No

24.8 There is adequate heating and ventilation in all rooms.  Yes  No

**This standard is judged to be:**  Met  Partially Met  Not Met

#### Comments

The head office premises are safe, secure and clean and are only accessed by the small team of staff. General access is appropriately secured. There is a controlled entry point at street level.

There are appropriate health and safety policies and procedures, such as regular fire drills, fire alarm and appropriate fire exit routes. The Provider has a clearly documented handbook for staff that outlines the health and safety requirements. There are clear notices regarding fire, health and safety procedures throughout the premises.

The homestay property in Norfolk has extensive grounds and provide a safe environment for participants on the programme. Both premises are maintained in a good state of repair, decoration and cleanliness.

Signage is good with adequate circulation space for participants and visitors.

There are appropriately allocated toilet facilities in both London and Norfolk that are clean and maintained daily.

**25. Training rooms and other learning areas are appropriate for the courses offered**

- |      |  |   |   |
|------|--|---|---|
| 25.1 | Training rooms and other learning areas provide adequate accommodation in size and number for the classes allocated to them.   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No                             |
| 25.2 | Training rooms and/or any specialised learning areas (e.g. laboratories, workshops, studios) are equipped to a level which allows for the effective delivery of each course. | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No                             |
| 25.3 | There are facilities suitable for conducting the assessments required on each course.  | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No <input type="checkbox"/> NA |

**This standard is judged to be:**

Met  Partially Met  Not Met

**Comments**

There is one suitable room in London which is used for face-to-face and online one-to-one tuition.

The training rooms in Norfolk are very comfortable and suitable for conducting tutoring sessions and assessments.

**26. There are appropriate additional facilities for participants and staff**

- |      |   |   |                             |                             |
|------|---|---|-----------------------------|-----------------------------|
| 26.1 | Participants have access to sufficient space and suitable facilities for private study, including library and IT resources.                                   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 26.2 | Trainers have access to sufficient personal space for preparing lessons, marking work and relaxation.   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 26.3 | Participants and staff have access to space and facilities suitable for relaxation and the consumption of food and drink where appropriate.                   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 26.4 | Participants and staff have access to storage for personal possessions where appropriate.   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No | <input type="checkbox"/> NA |
| 26.5 | There are individual offices or rooms in which trainers and senior management can hold private meetings and a room of sufficient size to hold staff meetings. | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |                             |
| 26.6 | Administrative offices are adequate in size and resources for the effective administration of the provider.   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |                             |

**This standard is judged to be:**

Met  Partially Met  Not Met

**Comments**

Staff have access to effective additional facilities including communal break areas and private staff rooms. There are a number of rooms at the Provider that can be booked and used for meetings.

There is wireless internet access throughout the premises in both London and Norfolk. The home-stay premises in Norfolk have very comfortable rooms that are available for use on the programmes by both participants, their parents and tutors.

All teachers are freelance and prepare training sessions from home. In London the tutors teach online.

Administration offices are of good size for the allocated number of staff and there are good resources to aid the effective administration of the Provider.



**COMPLIANCE WITH STATUTORY REQUIREMENTS**

Declaration of compliance has been signed and dated

Yes  No

## PART C - SUMMARY OF STRENGTHS AND ACTION POINTS

Numbering of action points aligns with that of the minimum standards

### MANAGEMENT, STAFFING AND ADMINISTRATION

#### Provider's Strengths

Bruton Lloyd has developed a highly effective administrative and programme management system based on its experience of dealing with clients who have specific educational and social requirements.

Actions Required	Priority H/M/L
2.4 Bruton Lloyd must review all policies and procedures for accuracy and effectively disseminate them across all the provision including to the residential home-stay study centre.	<input type="checkbox"/> High <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Low

### TEACHING, LEARNING AND ASSESSMENT

#### Provider's Strengths

The bespoke programmes provided by Bruton Lloyd are very well designed to meet the academic and social development needs of all participants.

Actions Required	Priority H/M/L
None	<input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low

### PARTICIPANT WELFARE

#### Provider's Strengths

The enthusiasm of the home-stay staff in Norfolk in meeting the needs of the clients is excellent and the programmes designed are specific to those needs and aspirations.

Actions Required	Priority H/M/L
17.6 The Provider must ensure that all staff, including third-party contractors, undertake appropriate training on safeguarding and must make safeguarding training part of the induction training for all staff.	<input checked="" type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low
17.6 Bruton Lloyd must ensure that appropriate and up-to-date DBS checks are carried out for all staff and Summer Educational Programme Managers prior to their appointment or prior to the start of their unregulated unsupervised activities.	<input checked="" type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low

### PREMISES AND FACILITIES

#### Provider's Strengths

The excellent premises used for home-stay and the high quality programme delivery, provided by the Summer Educational Programme Manager in Norfolk, are key to the success of the overall academic experience sought by the Provider's clients.

Actions Required	Priority H/M/L
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None

High  Medium  Low

**RECOMMENDED AREAS FOR IMPROVEMENT**

To be reviewed at the next inspection

None

**COMPLIANCE WITH STATUTORY REQUIREMENTS**