

## BRITISH ACCREDITATION COUNCIL INSPECTION REPORT

### Short Course Provider (SCP) Candidacy / Stage 2 Inspection

**NAME OF PROVIDER:** London School of Wealth Management

**ADDRESS:** Park House  
116 Park Street  
London  
W1K 6SS

**HEAD OF PROVIDER:** Mr Robert Duncan Donald

**DATE OF INSPECTION:** 4 October 2019

**ACCREDITATION STATUS AT INSPECTION:** Unaccredited

**DECISION ON ACCREDITATION:**

- Accreditation awarded for six months
- Decision on accreditation deferred
- Award of accreditation refused

DATE: 28 November 2019

### 1. Background to the institution

The London School of Wealth Management (LSWM/the Provider) is a private limited company wholly owned by Rose Capital Limited. The Provider was established in July 2019 to provide courses in financial trading and wealth management. It aims to empower its participants to take control of their financial futures by elevating their comprehension and control of financial markets, investing and trading.

LSWM's premises are located in an office complex in Mayfair, central London, together with the London offices of its sister company Kylin Prime Group (KPG). The suite used by the Provider includes a trading floor classroom that enables participants to experience simulated financial trading.

The Provider is governed by a board of directors. It is led by an academic dean with overall responsibility for content and quality of academic provision and management of the academic team. He is supported by a programme manager, with responsibility for operational aspects of course delivery, and staff from the parent company with specialisms in marketing, information technology (IT), accounts, human resources (HR) and law. Core staff continue to practise as traders, independently or for KPG. An independent director acts as academic and quality assurance advisor.

### 2. Brief description of the current provision

LSWM provides courses of two, four and ten weeks in financial trading and wealth management. The courses have received provisional accreditation by the Association of Business Executives (ABE). They have a specific business focus and do not relate to national qualification framework levels. The two week course is designed as an introduction to the field. The four-week diploma course covers, in detail, technical analysis, macro and micro economic analysis, trading psychology and trading strategy. The ten-week advanced diploma course includes the content of the diploma course and then leads participants to develop their own working trade strategy, with the support of industry experts.

Face-to-face courses include a combination of classroom lectures and real-time trading on a simulated trading floor which is designed to correspond to the live trading floors in major global banks and investment groups. Participants gain access and exposure to trading in foreign exchange, bonds, equities, indices and commodities.

Courses are also available as distance learning through the Provider's online learning platform. They include two daily webinar sessions, in which the latest market developments are considered. Participants have opportunities to discuss their own active trades and ask questions. Online delivery includes access to trading simulation and provision of one-to-one mentoring. A blended learning option is also available.

At the time of the inspection, there were five participants enrolled where one was following an online programme, three following blended learning programmes and one at the end of a face-to-face course. All were male. They were a mix of Swiss, Chinese, Bulgarian, Italian and British. The Provider has capacity for 50 online and 40 face-to-face participants. It plans to have 16 following each mode of delivery by the end of 2019 and 20 following each mode by the end of 2020. It is expected that initially the majority of online participants will be Chinese. This is due to the Chinese orientation of the parent company and the reach of their existing marketing and social media platforms. Participants for face-to-face courses are primarily recruited from the United Kingdom (UK) and Europe.

Courses are currently available to participants over the age of 18. No prior qualifications or subject knowledge are required, but applicants must demonstrate suitable motivation and sufficient ability in speaking and understanding English. A grade 6.5 in the International English Language Testing System (IELTS) test or an

equivalent qualification is suggested, but suitability is assessed during interview, either face-to-face or online. Participants are enrolled in four week cycles.

### **3. Inspection process**

The inspection was conducted by one inspector over one day. Meetings were held with the Director, the Academic Dean, the Independent Director, a member of the sales team and a participant. A tour of the premises took place and scrutiny of documentation and the database was completed. The arrangements for the delivery of the online and blended learning were reviewed. The Provider co-operated fully with the inspection.

## 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 including those working at the delivery venue or remotely.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
1.4	The provider has a written statement of its mission and goals that effectively guides its activities, is communicated to all stakeholders and is effectively implemented and regularly reviewed.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
1.5	The provider has a written risk management strategy, which includes financial planning and is effectively 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

The management structure is clearly defined in the organisational chart and in job descriptions. The roles and extent of authority of directors are documented and known to staff. The Director works closely with the leadership team and has effective oversight of academic provision and the marketing of courses. He has extensive relevant experience and a clear vision for the development of the Provider.

The Director attends monthly education committee meetings and the bi-annual academic board meetings of LSWM to ensure that the strategic aims of the Provider are met. There are quarterly meetings of the Board of Directors, which focus on the commercial aspects of the Provider. These are attended by the Chief Operating Officer and Finance Officer of KPG as well as the Director.

Leaders and managers are very well suited to their roles. All are well qualified and continue to operate as traders. The Programme Manager and the Academic Dean have recent experience of delivering courses for similar training providers. They benefit from support from the Independent Director, who has extensive experience in management of higher education in the UK. Staff have a good understanding of their own roles and those of others. They are effective in carrying out their responsibilities.

Communication throughout the Provider is good. Daily informal meetings take place between the management team and the Director. Courses are currently delivered primarily by the managers and traders of KPG who work together in the open plan trading floor classroom, facilitating communication among the academic team. A calendar of formal meetings is in place, although only the monthly education committee had met at the time of the inspection. Meetings follow an agenda, are minuted and result in appropriate actions.

Courses correspond with the goals of the Provider, which are suitably reflected in its mission statement. This is published on the website and is available to all stakeholders.

The Provider has a detailed and appropriate risk strategy in place, which includes financial planning. This will be reviewed and updated at the appropriate time.

## 2. The administration of the provider is effective

2.1	Administrators are suitably qualified and/or experienced, understand their specific responsibilities and duties and are effective in carrying them out.	<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	Administrative policies, procedures and systems are up-to-date, thorough, well-documented and effectively disseminated across the provider.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2.5	Data collection and collation systems are effective in supporting the administration of the provider.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2.6	Participants' and trainers' personal records are sufficiently detailed and regularly updated.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
2.7	The provider has a robust security system with policies in place for protecting the data of its participants and trainers.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

This standard is judged to be:

Met  Partially Met  Not Met

### Comments

Course administration is the responsibility of the Programme Manager, who is suitably experienced. The support provided is appropriate for the current number of participants and is clearly documented in the Programme Manager's job description.

Administrative policies are well documented and effectively disseminated via the staff handbook. Data collection and collation systems are suitable. The Provider is currently using spreadsheets and electronic files, but plans are in place to access the software used by its sister company for this purpose as participant numbers grow.

Participants' and trainers' personal records are sufficiently detailed and regularly updated. However, participants' personal records are not consolidated in individual files, but rather stored by category, for example, applications, assessments, attendance and feedback. This does not produce a coherent profile of a participant or provide a location for additional relevant information, for example notes on additional needs, to be recorded.

A suitably detailed and appropriate data protection policy is in place. Participants and staff are informed of how their data will be used and of their rights. Data is stored securely and shared appropriately.

## 3. The provider recruits appropriate staff

3.1	There are appropriate policies and effective procedures for the recruitment of suitably qualified and experienced staff which include, for self-employed staff, the development of a signed performance service level agreement.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
3.2	Experience and qualifications are appropriately checked and verified before recruitment and records are accurately maintained.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
3.3	The recruitment process for trainers working remotely includes a face-to-face online interview.	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> NA
3.4	There is an effective system for regularly reviewing the performance of all staff, which, for trainers, includes regular, scheduled course delivery observations.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
3.5	Managerial and administrative staff are appropriately supported in their continuing professional development.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

This standard is judged to be:

Met  Partially Met  Not Met

## Comments

Staff recruitment policies are appropriate. Job descriptions clearly specify the requirements for each role, including any relevant qualifications. Recruitment procedures for employees are robust. Records, including evidence of all required checks, are accurate and up to date.

3.1 3.2 However, these recruitment checks do not extend to the recruitment of self-employed trainers. An appropriate signed performance service level agreement and curriculum vitae (CV) are kept on file, but no records of other checks.

There are appropriate performance review procedures for staff, which result in individual Continuing Professional Development (CPD) plans. These will be implemented when relevant staff complete one year of employment. A suitable classroom observation report form has been produced to be used with all trainers. The Academic Dean will conduct the majority of observations and is awaiting training by the Independent Director.

Managerial and administrative staff are able to access suitable CPD delivered by members of the Rose Capital group, for example relevant training in digital communications from the media company housed in the same premises. They can also access webinars on specialist subjects delivered in order to update or broaden their knowledge. This is adequate for the current provision.

## 4. **Publicity materials, both printed and online, provide a comprehensive, up-to-date and accurate description of the provider and its courses**

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.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
4.2	Information on the courses available is comprehensive, accurate and up to date.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
4.3	The provider's key policies are accessible through the website.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

This standard is judged to be:

Met  Partially Met  Not Met

## Comments

Text and images provided on the website and in brochures accurately depict the location, premises and study facilities at the Provider.

Course information is accurate and up to date. Further detail is provided in interviews which are responsive to the existing level of applicants' knowledge.

Key policies are accessible via clear website links. Participants confirm that the website was helpful in their decision to apply for their course.

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

5.1	The provider ensures that the specific courses on which participants are registered are likely to meet the participants' expectations and needs.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
5.2	Entry requirements for each course, including those relating to language ability, where applicable, are set at an appropriate level and clearly stated in the course descriptions read by prospective participants.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> NA
5.3	A formal application and selection process ensures that participants meet the entry requirements.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> NA
5.4	Applicants are provided with sufficient information to enable them to make a judgment on the suitability of the courses and their delivery methods and can discuss any concerns before registration.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
5.5	The provider replies to all application enquiries in line with its appropriate target response times and all stakeholders are briefed properly on the nature and requirements of its programmes.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

5.6	Overseas recruitment agents are properly selected, briefed, monitored and evaluated.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
5.7	The provider has effective systems to identify participants who have special educational needs and disabilities requiring additional learning support or other assistance.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

#### Comments

The Provider has suitable procedures for the recruitment of participants, which are well documented and understood by staff. Initial contact is with the marketing team, which provides detailed information on the range of course content and delivery.

There are no entry requirements in respect of a participant's subject knowledge or qualifications. Applicants come from a wide range of backgrounds, from banking professionals seeking to extend their knowledge to amateur traders wishing to understand the methodology of trading. The key requirement is a suitable level of English to follow the course and this is assessed during the interview. The appropriate level of English is identified in publicity materials by reference to the internationally recognised IELTS qualification.

All applicants are interviewed either face to face or via the internet to ascertain their goals and match them to a course of suitable length. The Provider has an appropriate policy regarding enquiry response times.

5.7 Currently, the application form does not elicit special educational needs or disabilities requiring support although the Provider is able to accommodate a range of disabilities and will make a disabilities risk assessment at interview, where required.

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

6.1	There is a clear policy on participant attendance and punctuality, which is communicated to all participants and other stakeholders.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
6.2	Accurate and secure records of attendance and punctuality at each session are kept for all participants, collated centrally and regularly reviewed.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
6.3	Participant absences are followed up promptly and appropriate action is taken.	<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 a clear and appropriate attendance and punctuality policy, which is effectively communicated in handbooks and on the website.

Currently, attendance and punctuality are recorded daily on a spreadsheet. This is adequate given the low numbers of participants. The Provider plans to move to twice daily registration and electronic registration as numbers increase.

Any unexplained absences are followed up on the day by the Programme Manager.

#### 7. **The provider has effective systems to monitor its own standards and assess its own performance with a view to continuous improvement**

7.1	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
7.2	The provider has effective mechanisms for obtaining feedback from participants and other relevant stakeholders, such as staff, partners 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

7.3	Feedback is obtained, recorded and analysed on a regular basis.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7.4	The feedback is reviewed by management and appropriate action is taken.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7.5	There is a mechanism for reporting to the participants what the provider has done in response to their feedback.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
7.6	Reports are compiled at least annually, which include the results of the provider's performance reviews, an analysis of appropriate data, including participant feedback, and action plans.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
7.7	Action plans are implemented and regularly reviewed with outcomes reported to management.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

**This standard is judged to be:**

Met  Partially Met  Not Met

### Comments

The Provider has effective arrangements in place for monitoring and periodically reviewing all aspects of its performance.

In this early stage of delivery, daily informal feedback and weekly written feedback from participants is the primary means of evaluating the success of the provision and for making improvements. This feedback is discussed at daily management meetings and at the monthly education committee and results in ongoing adjustments being made to the provision. Participants are positive about their courses and are able to request adjustments to course content or delivery methods. They confirm that the Provider is responsive to their suggestions.

End of course feedback forms for participants and trainers have recently been introduced so have not yet been completed, but they are fit for purpose and will provide appropriate data for use in future course reviews. It is intended that once there are sufficient numbers of participants enrolled, a student forum will be established to report on the views of participants to the management team.

7.5 As yet there is no mechanism for communicating the Provider's responses to feedback from participants who are no longer attending at the premises.

An academic board is scheduled to meet twice each year to thoroughly evaluate provision and develop an action plan based on the outcomes. This process will feed into an annual report. The Academic Board will be comprised of the leaders of LSWM.

7.6 7.7 The date for the first academic board has not yet been reached so there are no available reports or action plans.

## INSPECTION AREA – PARTICIPANT WELFARE

### 16. Participants receive welfare support appropriate to their age, background and circumstances

16.1	There is at least one named staff member responsible for participant welfare who is suitably trained and/or experienced, accessible to all participants and available to provide advice.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
16.2	Participants receive appropriate information, advice and guidance before the start of the course.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
16.3	Participants receive an appropriate induction and relevant information at the start of the programme.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
16.4	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



16.5	The provider has policies to avoid discrimination and a procedure for dealing with an abusive behaviour, including cyberbullying, and these are effectively implemented.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
16.6	Effective safeguarding arrangements are in place for participants under the age of 18 and vulnerable adults, which are regularly reviewed.	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> NA
16.7	A suitable policy and 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
16.8	There is an e-policy in place that references any existing staff and participant codes of conduct and covers participants' on-site use of social media and devices such as mobile telephones, tablets and cameras.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> NA
16.9	The provider collects contact details for participants and their next of kin and appropriate staff can access the information quickly and easily, in and out of normal operating hours.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

**This standard is judged to be:**

Met  Partially Met  Not Met

### Comments

The Programme Manager has regular contact with all participants and provides support for practical welfare issues. He is suitably experienced from a previous mentoring role. For more complex issues he may refer participants to either the Academic Dean or the Independent Director, each with relevant specialist experience.

Participants receive appropriate information, advice and guidance from the marketing team and from academic managers during their interview. Participants confirmed that the information they received prior to enrolment was helpful and enabled them to choose a suitable course.

Induction is provided on the first day and enables participants to settle quickly into their course. For those attending at the premises, this includes a suitable health and safety briefing and an out-of-hours emergency contact number. All participants receive a copy of the student handbook, which includes relevant course information and policies. There is a suitable policy and procedure for dealing with discrimination and abusive behaviour, including bullying and cyberbullying.

The Provider has an appropriate policy to protect participants from the risks associated with radicalisation and extremism. All staff have completed the required training and a clear procedure indicates what they should do in case of any concerns. A thorough risk assessment has been completed.

Staff and participant codes of conduct cover acceptable and unacceptable uses of electronic and social media.

Details of participants' next of kin are included on the application form and are accessible on site and remotely to relevant staff.

### 17. International participants are provided with specific advice and assistance (if applicable)

17.1	International participants receive appropriate advice before their arrival on travelling to and living in their host country.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
17.2	International participants receive an appropriate induction upon arrival covering issues specific to the local area.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
17.3	Information and advice specific to international participants continues to be available throughout their course of study.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
17.4	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

Participants are interviewed by the Programme Manager, who can provide bespoke advice. Participants joining the face-to-face provision from abroad are sent an orientation document with information on how to travel to the UK and the premises and how to find suitable accommodation. It includes an introduction to healthcare and staying safe in London.

Additional information is available from the international staff of LCWM on arrival.

Information is provided in the orientation document on finding places of worship and where to purchase food that meets specific cultural requirements.

**18. The fair treatment of participants is ensured**

- |      |  |   |  |
|------|--|---|--|
| 18.1 | Participants apply for and are enrolled on courses under fair and transparent contractual terms and conditions, which include appropriate refund arrangements and a cooling-off period | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No  |
| 18.2 | 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  |
| 18.3 | Participants are advised of BAC's complaints procedure.  | <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**

Fair and transparent contractual terms and conditions are published in the application form. They include appropriate refund arrangements and a fourteen day cooling off period for anyone booking a course in advance.

The Provider has a clear and fair complaints procedure, which is published in the student handbook and on the website.

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

- |      |  |                              |   |
|------|--|------------------------------|---|
| 19.1 | Any residential accommodation is clean, safe and of a standard which is adequate to meet the needs of participants.  | <input type="checkbox"/> Yes | <input type="checkbox"/> No                             |
| 19.2 | Any residential accommodation, where participants under 18 are accommodated, is open to inspection by the appropriate authorities, including Ofsted.                             | <input type="checkbox"/> Yes | <input type="checkbox"/> No <input type="checkbox"/> NA |
| 19.3 | Clear rules regarding fire safety and other health and safety procedures are in place and appropriate precautions are taken for the security of participants and their property. | <input type="checkbox"/> Yes | <input type="checkbox"/> No                             |
| 19.4 | A level of supervision is provided which meets the needs of participants.  | <input type="checkbox"/> Yes | <input type="checkbox"/> No                             |
| 19.5 | Appropriate measures are in place to ensure that participants under the age of 18 and those over the age of 18 are separated when allocating accommodation.                      | <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**

**20. The welfare of participants in homestay accommodation is ensured and the provider's relationship with the hosts is properly managed (if applicable)**

20.1	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 type="checkbox"/> Yes	<input type="checkbox"/> No
20.2	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 type="checkbox"/> Yes	<input type="checkbox"/> No
20.3	The provider has appropriate contracts in place with any hosts, clearly setting out the rules, terms and conditions of the provision.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
20.4	Appropriate advice and support is given to both hosts and participants before and during the placement.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
20.5	Clear monitoring procedures are in place with opportunities for participant feedback and prompt action taken in the event of problems.	<input type="checkbox"/> Yes	<input type="checkbox"/> No

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

**Comments**

**21. Participants have access to an appropriate social programme and information on leisure activities in the local area (if applicable)**

21.1	Participants are provided with appropriate information on opportunities for participation at events and other leisure activities which may be of interest.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
21.2	The social programme is responsive to the needs and wishes of participants.	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> NA
21.3	Any activities within the social programme have been chosen with consideration for their affordability for the majority of participants.	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> NA
21.4	The activities organised by the provider are effectively supervised by a responsible adult representative with suitable qualifications and/or experience.	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> NA
21.5	Off-site social activities are subject to an appropriate risk assessment and suitable safeguards are put in place as a result.	<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**

**INSPECTION AREA – PREMISES AND FACILITIES**

**22. The provider has formal arrangements in place that mean it has possession of and/or access to suitable premises**

22.1	The provider has formal arrangements in place that mean it has possession of and/or access to suitable premises.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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22.2 The provider has access to suitable external premises of a temporary or occasional nature for training purposes.  Yes  No  NA

**This standard is judged to be:**

Met  Partially Met  Not Met

**Comments**

The Provider leases ample space in a modern office building. This provides an excellent environment for training and study.

**23. The premises provide a safe, secure and clean environment for participants and staff**

23.1	Access to the premises is appropriately restricted and secured.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
23.2	The premises are maintained in an adequate state of repair, decoration and cleanliness.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
23.3	There are specific safety rules in hazardous areas, for example, science laboratories, which are readily accessible to participants, staff and visitors.	<input type="checkbox"/> Yes	<input type="checkbox"/> No <input checked="" type="checkbox"/> NA
23.4	General guidance on health and safety is made available to participants, staff and visitors.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
23.5	There is adequate signage inside and outside of the premises and notice boards for the display of general information.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
23.6	There is adequate circulation space for the number of participants and staff accommodated, and a suitable area in which to receive visitors.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
23.7	There are toilet facilities of an appropriate number and level of cleanliness.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
23.8	There is adequate heating and ventilation in all rooms.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

**This standard is judged to be:**

Met  Partially Met  Not Met

**Comments**

Access to the building is via reception on the ground floor. It is highly restricted and secured. The building is fully accessible for wheelchair users. Participants and visitors are issued with a pass that allows access only to the Provider's premises.

The premises are new and exceptionally well maintained.

Appropriate health and safety information is provided to all participants and staff in induction and to visitors on arrival. Signage, including for emergency evacuation, is clear and appropriate throughout the building.

There are no physical notice boards in the building. All information is shared effectively electronically so the requirement for notice boards is not applicable.

23.5 However, the name of the Provider is not clearly displayed within the premises.

Circulation space is ample for the current number of participants and staff. A reception area is used to receive visitors.

There are adequate, clean toilet facilities.

Air conditioning maintains an appropriate temperature and level of ventilation in all areas.

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

24.1	Training rooms and other learning areas provide adequate accommodation for the teaching/training sessions allocated to them.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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24.2	Training rooms and any specialised learning areas, for example, laboratories, workshops and studios, are equipped to a level which allows for the effective delivery of each course.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
24.3	There are facilities suitable for conducting the assessments required for 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**

Training rooms are adequate for the current provision. There is ample space in the trading floor simulation room. It is intended that once larger face-to-face groups are recruited, the current small seminar room will be extended by expanding it outwards into the trading floor.

The trading floor room is well equipped with adjustable height desks, up-to-date computers and two monitors per work station. There is an interactive whiteboard for delivery of teaching. A large screen in the trading floor room is used to provide business news updates. These facilities meet the needs of both trainers and participants.

Assessments are conducted through the online platform and through electronic submission of presentation slides. Facilities provided are suitable for these assessments.

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

25.1	Participants have access to sufficient space, which could include a library and suitable Information Technology (IT) facilities so that they can carry out their own private work and/or study.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
25.2	Trainers have access to sufficient personal space for preparing teaching/training sessions, marking work and relaxation.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> NA
25.3	Participants and staff have access to space and facilities suitable for relaxation and the consumption of food and drink, including facilities that are located outside the premises.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
25.4	There are individual offices or rooms in which teachers/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
25.5	Administrative offices are adequate in size and are resourced 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**

Participants are provided with a log-in and access to a work station in the trading floor room, which they can use for individual study. The room is suitably quiet, and support is available from LSWM staff. This area is also used by trainers for preparing and marking work. Enclosed individual spaces are available for making telephone calls or working away from others.

Participants and staff have access to space and facilities suitable for relaxation and the consumption of food and drink. A kitchen is provided with tables and chairs, free hot and cold drinks, a microwave oven and a fridge for storing personal food. A spacious and comfortable cafeteria is located on the same floor. The premises are also very close to Oxford Street, near numerous food outlets.

The Provider has a meeting room and booths are provided for informal meetings of up to four people. It is also possible to book a meeting room within the KPG offices and board rooms elsewhere in the building when required.

There are no administrative offices except for those used by senior leaders. All staff work in the open plan trading floor room. This is adequate for the current size of provision.

## INSPECTION AREA – ONLINE DISTANCE AND BLENDED LEARNING COMPONENT (if applicable)

The numbers below refer to the standards as presented in the short course provider scheme document

### 26. Management, staffing and administration of online, distance and blended learning component

26.1	Senior managers have an understanding of the specific requirements of online, distance and blended learning.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
26.2	Data collection and collation systems include the logging of trainer and participant submissions and interaction and appropriate action is taken if the timeliness of these falls below expectations.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
26.3	There are established processes which enable the provider to verify that the participant who is registered on the programme is the same person who attends, completes the programme and receives any programme credit.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
26.4	Staff monitor the online activity of participants and trainers and take action immediately if there are concerns about cyberbullying or other online risks to participants.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

This standard is judged to be:

Met  Partially Met  Not Met

#### Comments

All senior managers have previous experience in delivering online distance and blended learning.

Trainer and participant submissions and interactions are logged automatically on the online platform. This is monitored by the Programme Manager, who will make contact with anyone whose contributions fall below expectations.

26.3 The goal of the programme for all participants is the knowledge and trading skills it provides rather than the qualification. Therefore, this key indicator is not applicable.

Currently there is no communication between participants except during the Provider's webinars, when a staff member is monitoring. The course does not present other online risks to participants.

### 27. Online course management is effective

27.1	There is a suitably qualified manager or management team with experience of online, distance and blended learning, who have responsibility for programme delivery and the management of the trainers.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
27.2	The provider has a sufficient number of qualified online trainers to give individualised instructional service to each learner.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
27.3	The allocation of online trainers to courses provides a consistent learning experience and delivery is monitored to ensure consistency.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
27.4	Online delivery methods are sufficient to attain the stated course objectives and intended learning outcomes.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No <input type="checkbox"/> NA
27.5	Online programme designers make effective use of appropriate teaching aids and learning resources.	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
27.6	Suitable additional study aids are provided through investment in technology and/or issuing supplementary study materials.	<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

All managers and trainers employed have suitable expertise. Most of the delivery is by the leaders and managers of LSWM, and suitably experienced staff of KPG. This arrangement is suitable for the current level of provision and provides appropriate consistency. All webinar delivery is recorded and monitored by managers.

The Programme Manager monitors participant performance to identify and address any issues. Online and blended learning course participants attend two webinars per day, with time to ask related questions. They apply learning immediately afterwards in a simulated trading activity. Participants also have one hour of mentoring each week in which they can discuss any content or technical issues. These methods are sufficient to attain the stated learning outcomes.

Additional learning resources are provided via links on the online platform. These enable participants to explore areas of particular interest and provide challenge for those with existing knowledge of topics covered in the units.

## 29. The enrolment process is comprehensive, transparent and supportive to applicants

29.1 Participants are made aware of the necessary level of digital literacy required to follow the stated programmes.  Yes  No

This standard is judged to be:

Met  Partially Met  Not Met

### Comments

The digital literacy required to follow the course is clear to the participants. The Programme Manager is available to support participants if there is any aspect of the software with which they are unfamiliar.

## 30. Online services provided meet the reasonable needs of participants

30.1 Instructions and suggestions on how to study and how to use the learning materials are made available to assist participants in learning effectively.  Yes  No

30.2 Staff are available to assist participants to resolve issues of a general and/or technical nature and all enquiries from participants are handled promptly and sympathetically.  Yes  No

30.3 The provider ensures that participants understand any system requirements and have access to appropriate technical advice to assist with technological problems which are the provider's responsibility.  Yes  No

30.4 The provider supports and encourages peer interaction through a variety of channels such as social media and virtual learning environment platforms.  Yes  No

This standard is judged to be:

Met  Partially Met  Not Met

### Comments

Participants are provided with information on how to study and exploit the learning resources during induction. The Programme Manager is available to resolve issues of a general and/or technical nature. Participants report that they are well supported. There are no specific system requirements beyond the need for fast broadband.

30.4 Currently the encouragement of peer interaction is underdeveloped.

## 31. The technology used to deliver the programmes is fit for purpose and effective

31.1 The provider uses appropriate and readily accessible technology to optimise the interaction between the provider and the participant and to enhance instructional and educational services.  Yes  No

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31.2 The provider has access to the services of an experienced IT technician who can ensure that systems are operative at all times and provide appropriate support to trainers and staff working remotely.  Yes  No

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

**Comments**

Online training is delivered through webinars, with resources and assessment provided through a commonly used online learning platform. These technologies are appropriate, readily accessible and optimise the interaction between the Provider and the participant.

The Provider has access to an experienced IT technician from within the Rose Capital group, who ensures that the systems are operative at all times and provides appropriate support.

**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**

Policies and procedures are well documented.	
The Provider has well qualified and experienced staff.	
The Provider benefits from access to other specialist staff through its sister company.	
Actions Required	Priority H/M/L
3.1 3.2 The Provider must extend the procedures for recruitment of self-employed trainers to include recorded verification of experience and qualifications.	<input type="checkbox"/> High <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Low
5.7 The Provider must implement effective systems to identify participants who have special educational needs and disabilities requiring additional learning support or other assistance.	<input type="checkbox"/> High <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Low
7.5 The Provider must establish a suitable means of reporting back to all participants on any actions taken in response to their feedback.	<input type="checkbox"/> High <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Low
7.6 The Provider must produce an annual report that includes the results of its performance reviews, an analysis of appropriate data, including participant feedback, and action plans.	<input type="checkbox"/> High <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Low
7.7 The action plans must be implemented and regularly reviewed.	<input type="checkbox"/> High <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Low

**PARTICIPANT WELFARE**

**Provider’s Strengths**

High levels of appropriate support available.	
Actions Required	Priority H/M/L
None	<input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low

**PREMISES AND FACILITIES**

**Provider’s Strengths**

High-quality premises and facilities.	
The trading floor simulation room provides experience of the work environment.	
Very good provision for relaxation and consumption of food and beverages.	
Actions Required	Priority H/M/L
23.5 Signage within the premises must be enhanced to clearly identify the Provider’s location.	<input type="checkbox"/> High <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Low

**ONLINE DISTANCE AND BLENDED LEARNING COMPONENT (if applicable)**

**Provider's Strengths**

Participants taking online and blended learning courses have access to high levels of support from well qualified staff.

Actions Required	Priority H/M/L
30.4 The Provider must introduce suitable ways of encouraging peer interaction between participants taking online courses.	<input type="checkbox"/> High <input checked="" type="checkbox"/> Medium <input type="checkbox"/> Low

**RECOMMENDED AREAS FOR IMPROVEMENT**

To be reviewed at the next inspection

The Provider should consider consolidating the information it holds on participants in individual personal files to provide a coherent record.

**COMPLIANCE WITH STATUTORY REQUIREMENTS**

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