

Improve

FOOD & DRINK SKILLS COUNCIL

**Assessment Strategy
for
Improve's
Accredited Qualifications
Scotland**

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Assessment Strategy

Section 1

1.1 Purpose

The purpose of this assessment strategy is to set out the quality assurance arrangements for the assessment and verification of Scottish Vocational Qualifications (SVQs), and competence based qualifications for the food and drink sector. Information is provided about the experience, qualifications and occupational competence requirements for those involved in the process. It also details the evidence requirements and conditions of assessment necessary to achieve the qualifications. This strategy will be useful in informing learners, employers, assessors, verifiers and Awarding Bodies/Organisations alike.

1.2 Scope

This assessment strategy covers Improve's Scottish Vocational Qualifications.

It applies to all SVQs, and competence based qualifications for the food and drink sector, developed by Improve. Those qualifications which have additional regulatory or specialist assessment requirements are identified and dealt with in specific sections of this strategy.

Improve provides a separate Assessment Strategy document for competence-based qualifications for the food and drink sector in England, Wales and Northern Ireland.

In Scotland, Improve's logo may only be used on qualification certificates and documentation by Awarding Bodies working in partnership with Improve.

1.3 Features

Of Scottish Vocational Qualifications

Improve's Scottish Vocational Qualifications in Food and Drink Operations, are designed for use in the food and drink sector. They cover the food supply chain from the availability and processing of raw materials through storage, transportation, wholesaling, manufacturing and processing, logistics and presentational processing in sales environments.

SVQs are competency-based qualifications designed for use in the workplace.

Their purpose is to raise skills levels and performance across the workforce.

They ensure that individuals develop the skills and knowledge, which are exactly those needed to perform reliably and consistently at work. The knowledge content of the qualifications is designed to support and suit individual's needs. It will support those who require the basics, but will also develop those who require significantly more detailed knowledge and understanding.

This flexible approach to designing Scottish Vocational Qualifications allows employers and individuals to select those competences which are critical to performance at work, and also to support progression in employment. This way it is possible to develop the workforce and produce the technicians and managers of tomorrow. With such a key focus on the development and recognition of competence at work, these qualifications are ideal to use within workplace training and assessment systems. They will be essential to upskilling, driving up performance and increasing productivity across the food and drink sector.

Of the Scottish Credit and Qualifications Framework (SCQF)

SVQs are made up of units of competence based on National Occupational Standards. SVQs in the food and drink sector have been credit rated and placed on the SCQF.

Each unit of competence is allocated a level, based on the SCQF descriptors, which reflect the degree of challenge of each unit.

Each unit is also allocated a credit value. This credit value is based on the average amount of time taken to complete the learning and assessment required by each unit. One credit equates to 10 hours of learning. Units with differing credit values are therefore a feature of qualifications, reflecting the varying learning and assessment requirements of units.

For further details about the SCQF, visit www.scqf.org.uk

1.4 Equality of Opportunity and Diversity

Improve is committed to developing high quality qualifications for the Scottish Credit and Qualifications Framework which comply with all current relevant legislation and SQA Accreditation regulations. For further details of how we work to ensure equality of opportunity and diversity, please refer to our Equality and Diversity Policy.

Awarding Body/Organisation policy, procedures and guidance will detail the equality of opportunity and diversity implications for assessors and verifiers.

Section 2

2.1 Working with Awarding bodies/organisations

Improve works closely with Awarding Bodies/Organisations to ensure that the SVQs can be effectively implemented.

In addition to engagement and technical activity at a forum level, individual memoranda of understanding and/or action plans are agreed with individual Awarding Bodies/Organisations to drive forward a range of operational and development activity.

Improve respects the individuality and confidentiality of each Awarding Body/Organisation offering qualifications to the sector and the market place in which they are offered. Improve understands the need for differentiation in types and levels of service provided by Awarding Bodies/Organisations to meet wide-ranging conditions across the sector, its labour market and potential sector entrants.

2.2 External quality control of assessment

The sector view is that it is important for external quality control to be achieved through an effective external quality sampling process combined with an annual approved centre risk rating system. Primarily, external quality control is aimed at improving internal quality assurance and assessment practice, and the effective exchange of information between centres, Awarding Bodies/Organisations and Improve.

External quality control will be achieved through these requirements:

- Improve recommends that each year external verifiers will complete two days of Continuing Professional Development (CPD), comprised of training or other developmental activities relevant to the food and drink sector and approved by the Awarding Body/Organisation. Training should include relevant updating in respect of changes to legislation and regulations impacting on the sector, standardisation activities and good practice developments in assessment and improving quality assurance. Improve may be invited by Awarding Bodies/Organisations to observe and/or provide relevant input to CPD activity as appropriate.
- Awarding Bodies/Organisations will operate a risk rating system that is applied to each approved centre. Details of the risk rating system should be provided as part of the submission for accreditation of the qualification to the relevant qualifications regulatory authority. The Awarding Bodies/Organisations will carry out risk assessment and risk rate each approved centre for food and drink Scottish Vocational Qualifications. External quality assurance activity, and in particular the scope and rigour of sampling, is required to reflect the risk rating status of each centre.
- Improve, through its Qualifications and Frameworks staff, will maintain ongoing dialogue with Awarding bodies/organisations to monitor practices, consider issues and gain feedback, which impact on qualifications design and the use of units of competence.

2.3 Approval of centres to offer Scottish Vocational Qualifications

Approval procedures and quality assurance systems are developed by Awarding Bodies/ Organisations. Awarding Bodies/Organisations will approve and quality assure provision of Scottish Vocational Qualifications within centres. This allows assessment and verification activity to be tailored to the professional needs of centres in the best interests of candidates.

Section 3

3.1 Approved Centres

Approved Centres who are learning and skills providers deliver training and assessment services to learners and their employees in and around the workplace. Providers usually employ or contract with assessors, who often work peripatetically, to visit learners in their workplace at pre-arranged or contracted times.

For some employers, there may be business and operational advantages to becoming a centre to deliver qualifications and obtaining their own centre approval from an Awarding Body/Organisation. This involves setting up and maintaining the quality systems and controls required by Awarding bodies/organisations to offer qualifications within the company. Employers deliver training and assessment services to learners employed in their workplace. They use assessors (sometimes referred to as in-house assessors as they are usually company employees) to assess learner employees. However, they may also contract out externally with assessors who work peripatetically, to visit learners in their workplace at contracted times.

Units of competence completed by learners and assessment practice are subject to internal quality assurance via the internal verification process. Internal verification is an agreed and planned sampling process. This is carried out by a centre's internal verification staff, who may be employed or under contract, to quality assure the assessment processes and practice.

3.2 Occupational competence of assessors

The role of an assessor is a demanding and complex one, requiring a high degree of both interpersonal and organisational skills. Assessors are required to make accurate and objective decisions as to whether the learner's performance meets the assessment requirements laid out in units of competence.

For assessments to be considered valid, the assessor must meet the following requirements. Any assessments carried out by personnel who do not meet these requirements will be deemed a contribution to workplace testimony.

Assessors are required to:

- Provide current evidence of competence, knowledge and understanding in the areas to be assessed, to the satisfaction of the Awarding Body/Organisation. This will normally be achieved through demonstrating competence in the roles which are to be assessed, which may be recorded in company training records. Alternatively, this can be demonstrated by relevant experience and continuing professional development which may include the achievement of qualifications relevant to the areas being assessed.
- Hold or be working towards achievement of the relevant assessor qualifications approved by the regulatory authorities and set out in national requirements and guidance for assessment.
- Demonstrate their continuing professional development to ensure they are up to date with work practices in their sector area of expertise and developments in the Scottish Vocational Qualifications they assess.

- Have a full and current understanding of the units of competence and requirements of the qualifications being assessed.
- Operate safely as an assessor in a food environment, therefore it is strongly recommended that a relevant food safety/hygiene qualification is achieved.

Assessors 'in training' who are not fully recognised as competent by Awarding Bodies/Organisations may carry out assessment practice. For the period in training and working towards recognition, the assessor must have assessment activity monitored and signed off (countersigned) by a fully recognised and competent assessor. The 'in training' period should be limited to twelve months and have clear development goals set for achieving recognition and competence.

3.3 Occupational competence of internal verifiers

Approved centres appoint internal verifiers and their role is to ensure consistency, maintain and improve the quality of assessment within the centre. The internal verifiers will monitor assessment activities and provide feedback to assessors, co-ordinate standardisation and provide guidance to assessors.

For assessments and internal quality assurance to be considered valid, the internal verifiers must meet the following requirements:

- Demonstrate sufficient and current understanding of the qualifications to be internally verified, and know how they are applied in business, to the satisfaction of the Awarding Body/Organisation. Relevant knowledge and understanding of the workplace areas to be sampled during quality assurance activity is required. Relevant experience of working in or with the sector area(s) is preferable.
- Demonstrate competent practice in internal verification of assessment, and demonstrate understanding of the principles and practices of internal verification of assessment.
- Hold or be working towards achievement of the relevant internal verification qualifications approved by the regulatory authorities and set out in national requirements and guidance.
- Demonstrate their continuing professional development to ensure they are up to date with work practices and developments in the qualifications they internally verify.

- Know where and when to access specialist sector advice, where additional specialist or technical knowledge relating to assessment and internal verification decisions are concerned.
- Operate safely in a food environment, therefore it is strongly recommended that a relevant food safety/hygiene qualification is achieved.

Internal verifiers 'in training' who are not fully recognised as competent by Awarding Bodies/Organisations may carry out internal verification of assessment practice. For the period in training and working towards recognition, they must have their internal verification activity monitored and signed off (countersigned) by a fully recognised and competent internal verifier. The 'in training' period should be limited to twelve months and have clear development goals set for achieving recognition and competence.

Section 5

4.1 Assessment evidence

Scottish Vocational Qualifications are specifically designed to be assessed in the workplace and workplace performance evidence is essential for all units of competence. The Scottish Vocational Qualifications contain two types of units of competence.

1. Occupational skills and knowledge units must normally be assessed by observation in the workplace. Assessment requirements and guidance are outlined on each unit.
2. Underpinning knowledge units must be assessed through questioning methods relevant to the needs of the learner on or off-the-job. It is important to follow the assessment requirements and guidance outlined on each unit.

The use of employer's training and assessment processes and records in the workplace are strongly encouraged, where this supports evidence of competent learner performance. This is particularly significant where such evidence is audited as part of external quality standards relevant to the food and drink sector. Learner records of assessment and internal quality assurance activity will in this case reflect employer systems and records.

Where employer's assessment processes or records are insufficiently rigorous to generate credible evidence of learner performance, then formal assessment processes must be implemented to confirm learner's competence and this evidence captured in portfolio based records of assessment and internal verification.

4.2 Workplace testimony

Workplace personnel, who are not recognised as assessors, may contribute to the assessment process by providing workplace testimony. Those providing the testimony must be familiar with the activity being carried out and able to make a judgement that the task has been completed to organisational procedures and to the required standard. The person providing the testimony is not in a position to decide if the learner is competent overall, they are only able to judge the specific instance they observe. The overall decision regarding competence of the learner will be made by the assessor and subject to internal verification.

4.3 The use of simulation for providing evidence

The use of simulation to replace normal working practice is **not** acceptable.

The only exception to this rule is for units of competence which address rare conditions or emergency situations which might endanger learner safety. These exceptions are clearly defined in the assessment guidance in the relevant unit of assessment. In such cases this will require the agreement of external quality assurance personnel.

When simulations are used they must be designed to mirror the same activity, as it would be carried out in the workplace and include:

- The number and sequence of actions needed to complete the activity
- The number and complexity of factors needed to complete the activity
- The urgency with which the activity must be completed and
- Achievement of an outcome(s) in the same time constraints that might apply in the workplace

Simulation cannot be used to provide the sole evidence for any one complete unit of assessment

4.4 Recognition of prior learning and experience

Evidence from past achievement may be included as evidence within assessment methods for Scottish Vocational Qualifications.

Evidence of knowledge and understanding can be presented as supplementary evidence, provided it is a measurable assessed outcome of learning which links to outcomes detailed in the units of competence and confirms current competence.

Assessors should make best use of all the assessment methods available to them in ensuring the most reliable and effective use is made of claims of prior learning and experience which relate to the individual learner's circumstances.

All learners, presenting evidence from past achievements, must also be able to demonstrate current competence.

Section 5

5.1 The role of external verifiers

Awarding Bodies/Organisations appoint external verifiers to perform a number of quality assurance tasks on their behalf. They visit centres to monitor the assessment and internal verification processes and sample learners' work to ensure that standards are maintained and are compliant with Awarding Body/Organisation procedures. External verifiers also have a developmental role in assisting centres to develop best practice and to provide information on new qualifications and developments in assessment and quality assurance.

External verifiers are required to:

- Demonstrate sufficient and current understanding of the areas within the sector being externally quality assured.
- Demonstrate sufficient and current understanding of the qualifications to be externally verified, and know how they are applied in the sector, to the satisfaction of the Awarding Body/Organisation.
- Hold, or be working towards achievement of the relevant external verifier qualifications, approved by the qualification regulatory authorities and set out in national requirements and guidance.
- Complete a minimum of two days Continuing Professional Development (CPD) each year, composed of training or other developmental activities relevant to the food and drink sector and approved by the Awarding Body/Organisation.
- Have good report writing, auditing and communication skills to the satisfaction of the Awarding Body/Organisation.
- Know where and when to access specialist sector advice, where additional specialist knowledge relating to assessment and quality assurance decisions is concerned.

5.2 External quality assurance of assessment for employer approved centres

Awarding Bodies/Organisations approving employer centres may wish to consider flexibilities in the external quality assurance of these centres to meet the specific learning and development needs of employers and employees (learners). The purpose of these flexibilities is to build effective and pragmatic links to employer training, where the external quality assurance of Scottish Vocational qualifications is not compromised in principle, but that the application of external quality assurance is better aligned to good workplace training and development practice to maintain the required rigour.

Flexibilities in external quality assurance of assessment can only be considered where the employer can demonstrate a sufficiently structured and internally quality assured approach to learning, development and assessment. In the food sector this is often linked to the use of externally recognised quality assurance arrangements (e.g. BRC, Efsis, ISO 9000 series). The external audit of training systems and records implicated by some of these arrangements will provide additional evidence to Awarding Bodies/Organisations of the rigour of internal quality assurance.

To approve such employer centres Awarding Bodies/Organisations will work closely with appropriate employers to evaluate their training systems. This must include;

- the alignment/mapping of employers training and assessment arrangements to qualifications
- an analysis of the effectiveness of internal quality and recording systems
- evaluating the extent to which external audits of training contribute to overall quality arrangements.

Flexible external quality assurance arrangements to align with the training systems of individual employers in an employer centre may not always be necessary and will normally comply with section 5.1. However, flexibilities may be agreed as an outcome of the evaluation activity, where a rationale for such flexibility is justified. Awarding Bodies/Organisations will formally agree the arrangements with the employer centres.

For example, a sector specialist external verifier may be involved in the evaluation, setting up and approval of an employer centre to ensure that technical expertise is suitably involved in recognising employer training at the centre, allowing a non-sector external quality assurer to carry out ongoing external verification of assessment. The non-sector expert should

have experience of the systems and processes used in the food and drink sector.

In this instance, the sector specialist external verifier should be available for consultation and to re-evaluate the centre should the employer training systems or circumstances change.

Annex 1

1.1 The SVQs in Achieving Food Manufacturing Excellence (AFME)

The SVQs in Achieving Food Manufacturing Excellence have **additional** assessment and quality assurance requirements to those set out in sections 1 – 5 of this strategy. These qualifications are aimed at developing, confirming competence and sustaining a mix of skills which will support lean, improvement and change management practice in food and drink manufacturing across the sector. These skills are vitally important to the future economic success of the sector. The skills are critical to driving improvements in food manufacturing and processing from both a technical as well as practical perspective, and more importantly sustaining these improvements. It is also critical because the mix of skills is based upon empowerment, company cultural development and visionary leadership and management.

With such a significant range of competences set out, employers feel that it is important to fully define the types of assessment and quality assurance requirements for this qualification, which will make a positive difference to their operations through skills, in this business critical area.

1.2 Occupational competence of assessors for AFME

The requirements below are **in addition** to those set out in section 3 of this assessment strategy;

Assessors are required to:

- Have experience in the implementation, application and sustainability of lean and/or improvement skills practice in relevant manufacturing, processing or logistics roles in the food and drink sector, where there have been measurable and beneficial productivity gains to companies.
- Demonstrate achievement in learning and/or competence in lean and improvement skill practice in the food and drink sector to the satisfaction of the Awarding Body/Organisation. Examples may include; green/black belt 6 sigma courses, SVQ in Achieving Food Manufacturing Excellence, N/SVQ in Business Improvement Techniques at an appropriate level.
- Have a sound underpinning achievement in the application of mathematics and communication in order to demonstrate competence in using and articulating the mathematical requirements of improvement techniques.

- Assessors who cannot demonstrate that they are working directly and currently in the food and drink sector in a leading edge lean management and implementation role are required to undertake at least one annual update and refresher training session, which covers implementation of improvement techniques. The session should be provided by an approved centre and agreed by the external verifier.
- Assessors who cannot demonstrate that they are working directly and currently in the food and drink sector in a leading edge change management/implementation role are required to undertake at least one annual update and refresher training session, which covers leadership, management, workplace cultural development and sustainability of lean and improvement practice. The session should be provided by an approved centre and agreed by the external verifier.

These annual update and refresher training sessions will ensure that both lean improvement techniques **and** leadership, management, workplace cultural development and sustainability of lean and improvement practice in the food and drink sector are

- assessed using best practice in the workplace
- reflecting the means by which techniques are currently implemented and sustained in the workplace
- reflecting the means by which workforce development supports and sustains the improvement culture in the workplace
- supporting effective and measurable improvement and productivity gains in the workplace.

1.3 Occupational competence of internal verifiers for AFME

- Internal verifiers who cannot demonstrate that they are working directly and currently in the food and drink sector in a leading edge lean management and implementation role are required to undertake at least one annual update and refresher training session, which covers implementation of improvement techniques. The session should be provided by an approved centre and agreed by the external verifier.
- Internal verifiers who cannot demonstrate that they are working directly and currently in the food and drink sector in a leading edge change management/implementation role are required to undertake at least one annual update and refresher training session, which covers leadership, management, workplace cultural development and sustainability of lean and improvement practice. The session should be provided by an approved centre and agreed by the external verifier.

These annual update and refresher training sessions will ensure that both lean improvement techniques **and** leadership, management, workplace

cultural development and sustainability of lean and improvement practice in the food and drink sector are

- quality assured using best practice in the workplace
- reflecting the means by which techniques are currently implemented and sustained in the workplace
- reflecting the means by which workforce development supports and sustains the improvement culture in the workplace
- supporting effective and measurable improvement and productivity gains in the workplace.

1.4 Occupational competence of external verifiers for AFME

External verifiers must meet the requirements set out in section 5 of this assessment strategy. In addition;

- External verifiers who cannot demonstrate that they are working directly and currently in the food and drink sector in a leading edge lean management and implementation role are required to undertake at least one annual update and refresher training session, which covers implementation of improvement techniques. The session should be provided by the Awarding Body/Organisation.
- External verifiers who cannot demonstrate that they are working directly and currently in the food and drink sector in a leading edge change management/implementation role are required to undertake at least one annual update and refresher training session, which covers leadership, management, workplace cultural development and sustainability of lean and improvement practice. The session should be provided by the Awarding Body/Organisation.

These annual update and refresher training sessions will ensure that both lean improvement techniques **and** leadership, management, workplace cultural development and sustainability of lean and improvement practice in the food and drink sector are

- quality assured using best practice in the workplace
- reflecting the means by which techniques are currently implemented and sustained in the workplace
- reflecting the means by which workforce development supports and sustains the improvement culture in the workplace
- supporting effective and measurable improvement and productivity gains in the workplace.

Annex 2: Certificate in Protecting the Welfare of Animals at Time of Killing

This competence based qualification is recognised as a 'Qualification Certificate' in support of the achievement of 'Certificates of Competence' cited in EU Regulation 1099/2009 and, in particular Articles 7, 17, 21, 29 and Annex IV. It is available in Scotland.

The qualification assesses and confirms the competence of individuals in the workplace when protecting the welfare of animals and/or birds at the time of killing. The qualification covers the care, movement, preparation and slaughter of animals and/or birds to be processed as food for human consumption.

Learners need to select relevant units from the qualification to cover their own areas of work responsibility (e.g. lairage operations) for the species of animals and/or birds that they work with.

From the point of taking up work and training a learner has a three month period to achieve the qualification.

2.2 Food Standards Agency's requirements

Before being assessed for the qualification learners are required to register for temporary certificates of competence.

On completion of their qualification, learners may apply to the Food Standards Agency for their photo card licence.

Details of application processes for the temporary certificate of competence and licence are available from the Food Standards Agency, York.

2.3 The Role of Meat and Poultry Processing Company Staff

Assessment and internal quality assurance should be conducted by supervisors, managers or other suitably experienced staff employed or contracted by meat and poultry processing companies. Such personnel may have a role or background as; Veterinarians, Animal Welfare Officers, Meat Hygiene Inspectors, Production Managers, Process Team Leaders or Supervisors –who have relevant experience of the specific areas which they intend to assess, e.g. lairage, slaughter or killing of animals and/or birds.

To satisfy the requirements of Regulation 1099/2009 assessment must be independent and free from any of conflict of interest. Therefore, assessors must **not** be directly involved in the line management of learners.

Assessment and quality assurance of assessment must be conducted in the workplace.

The assessment criteria for the skills components of the units of assessment require two observations by assessors. As a minimum, there must be a period of defined break (e.g. lunch break), between the two observations of a learner for any unit of assessment. It is preferable that the observations are carried out on separate days in order to better demonstrate consistent performance by the learner over time.

Where the capacity or capability of the meat and poultry company is not geared to conduct assessment and quality assurance to the required standards, then external services can be used to provide the quality assurance roles of the qualification, provided this is conducted in the workplace. Such assessors and quality assurance personnel are referred to as 'peripatetic'.

Where, externally contracted peripatetic services are used, the qualification cannot be awarded without the involvement of relevant company personnel in the quality assurance process. Company personnel may contribute to the process of confirming competence of learners, by providing observations, witness testimonies or other supplementary evidence to support assessment decisions in the workplace. External quality assurance personnel will be required to check this provision within the sampling arrangements for external quality assurance.

Further details of flexibilities in external quality assurance of assessment for employer approved centres, are set out in Section 5.2 of the main body of this assessment strategy.

2.4 Occupational competence of assessors

The requirements below are in addition to those set out in section 3 of this assessment strategy.

Assessors are required to:

- Hold a Level 2 Certificate in Protecting the Welfare of Animals at Time of Killing, crediting units which cover the specific activities to be assessed.
- Preferably have worked in a role involving these activities to be assessed for at least six months per year for three of the last five years.
- Assessors who cannot demonstrate that they are working directly and currently in roles protecting the welfare of animals, are required to demonstrate a minimum of 2 days of Continuing Professional Development (CPD) per year, relevant to the units they will assess. This should be agreed and monitored by the external quality assurer. In some cases the external quality assurer may decide that up to 5 days of CPD per year, are required.
- Trainee assessors that do not hold the Certificate in Protecting the Welfare of Animals at Time of Killing will have a three month period to complete the qualification, and during this time any assessment activity will need to be shadowed and countersigned by an Official Veterinarian (OV) or qualified assessor.
- For assessment of the stunning units, assessors must demonstrate an understanding of animal physiology, brain function, principles of stunning and behaviour during unconsciousness, indicators used to detect signs of consciousness, sensibility and measures to detect the absence of signs of life which is appropriate to the level and content of the units being assessed.

2.5 Twelve month assessor qualifications amnesty

It is recognised that during the first year of implementation, assessors will need time to achieve their own Level 2 Certificate in Protecting the Welfare of Animals at Time of Killing, crediting units which cover the specific activities to be assessed, before assessing others. For the first 12 months from the SQA Accreditation's approval date of the qualifications **only**, an amnesty period will apply (ie from 12 December 2012)

During this time, assessors with relevant experience of assessment practice and the units they are to assess may conduct assessment, without holding the qualification(s) themselves. The first of such

assessments should be countersigned by an Official Veterinarian (OV). If the OV is satisfied with this assessment decision, further assessments do not need to be countersigned.

2.6 Occupational competence of internal quality assurance personnel

The requirements below are in addition to those set out in section 3 of this assessment strategy.

Internal quality assurers are required to:

- Demonstrate sufficient and current understanding of the units which will be internally quality assured, and know how they are applied in the workplace, to the satisfaction of the Awarding Organisation. Relevant experience of working in the areas being quality assured is preferable.

2.7 Learner Malpractice

In any case where the assessor or other quality personnel, observes learner malpractice which has the potential to cause or causes actual harm or stress to animals or birds, assessment should not take place, or if in progress must be stopped immediately. In addition this learner malpractice should be reported promptly to the OV and learner's line manager on site.