

TRAINING POLICIES

FOR

ASBESTOS COURSES

This Manual is issued under the authority of The Training Manager

Colette Willoughby (Training Manager)

Issue 03
September 2024

Contents

1.0	Enquiries	3
2.0	Equal Opportunities	3
3.0	Reasonable Adjustment and Special Consideration	4
4.0	Insurance.....	5
5.0	Complaints	5
6.0	Appeals.....	9
7.0	Malpractice and Maladministration	11
8.0	Contingency Plan	16
9.0	Data Protection Policy.....	16
10.0	Internal Quality Assurance Policy	16

1.0 Enquiries

Our e-portfolio learning platform provides access to our online learning courses. To register for the chosen course the candidate will enter their details when prompted to do so after which they will be required to make payment. When payment has been successfully authorised, the candidate will receive an email link to access their chosen course. The details provided as part of this registration process will also be shared with NOCN as part of the enrolment requirements for the course final assessment.

Candidates wishing to take the classroom Level 5 course will also register using the online platform.

Successfully registered candidates will have access to all teaching and learning sessions plus a resource's library of support documents. Our functional skills specialists are also on hand for any additional support and guidance needed.

In the event of not being able to successfully register the candidate may contact our support email (trainingsupport@asbestos-compliance.co.uk or hello@asbestos-compliance.co.uk), so that we can rectify any issues or coach them through the sign-up process.

If a candidate experiences any user issues with the course, they may contact us via the built-in messaging system within the course software or contact our support email (trainingsupport@asbestos-compliance.co.uk or hello@asbestos-compliance.co.uk) for assistance.

2.0 Equal Opportunities

No learner or applicant should be disadvantaged or treated less favourably because of conditions or requirements that cannot be justified. Asbestos Compliance Limited will seek to make reasonable adjustments to its arrangements with a view to avoiding substantial disadvantage for people with disability.

Action will be taken to ensure that individuals are treated equally and fairly.

We will seek to provide a learning environment that is free from unlawful discrimination, harassment or victimisation. Any form of behaviour that discriminates, without proper justification, on the grounds of such factors as gender, marital status, family responsibility, sexuality, race, nationality, colour, ethnic or national origin, religion or religious belief, social class, medical conditions, disability, trade union membership or activity, age and unrelated criminal convictions will not be tolerated.

Every employee is responsible for embedding a culture that welcomes diversity, and one that challenges and deals with unfairness and discrimination.

Every learner is responsible to act at all times in a manner that is non-discriminatory and respects the individuality of others; challenge prejudice, discrimination or harassment whenever and wherever they see it; and bring it to the attention of Asbestos Compliance Limited staff any procedures, practices or services that they perceive limit equality of opportunity or access.

3.0 Reasonable Adjustment and Special Consideration

How can I apply for a reasonable adjustment?

When registering for an online course information should be sent to the trainingsupport@asbestos-compliance.co.uk or hello@asbestos-compliance.co.uk email as soon as possible if you require a reasonable adjustment to assist with delivery of the course and taking the final assessment. You will need to provide supporting evidence with your request. You must provide the necessary supporting evidence to trainingsupport@asbestos-compliance.co.uk or hello@asbestos-compliance.co.uk at least one week head of applying to take the final assessment and also at least two weeks ahead of any class room based training.

When should I apply for a reasonable adjustment?

As soon as possible but at least one week ahead of applying to take the final assessment or at least two weeks ahead of any class room based training. The sooner you can provide details and supporting evidence of what you need for the assessment or training, the sooner they can process your request and ensure the adjustments you require can be put in place for you.

The closing date for applying for a reasonable adjustment or accommodation is 7 days prior to taking the final assessment. Any requests submitted after this date cannot be guaranteed to be processed and be put in place for the assessment.

What adjustments can I have in the assessment?

All adjustments will be considered on an individual basis, based on your circumstances and the evidence that you provide. Adjustments can be offered to support a range of individual circumstances. This includes disabilities, short-term medical conditions, maternity-related and other circumstances that may mean that you would need a change to the standard conditions of the assessment. For example, this may include additional time and/or increased font size of text.

The following adjustments can also be applied for:

- use of text to speech software
- use of software to change background colour of screen
- use of coloured screen overlay suitable for your device

Asbestos Compliance Limited and the assessment body is unable to provide the above software but the platform is compatible with most commonly used software for the above. We recommend testing the software used thoroughly before taking the assessment. We would only recommend using the above software if you are using it generally in your day-to-day life. Attempting to use new software that you are unfamiliar with in an assessment is likely to be unhelpful.

Should you have any queries about adjustments for the assessment or course, please contact trainingsupport@asbestos-compliance.co.uk or hello@asbestos-compliance.co.uk to discuss your individual circumstances in more detail.

4.0 Insurance

Asbestos Compliance Limited holds adequate insurance cover relevant to its area of operation with the following policies and cover:

- Employers Liability – £10,000,000
- Professional Indemnity – £1,000,000
- Public Liability – £1,000,000

5.0 Complaints

Purpose

Asbestos Compliance Limited (ACL) is committed to providing an efficient and high standard of service to all. ACL take every care to ensure we are delivering a high standard of service but are aware that there may be occasions that we do not meet both yours and our expectations, in this instance please raise your concerns with us immediately so we can address them, respond positively, and rectify any mistakes made.

Policy

Asbestos Compliance Limited is committed to promoting fairness and equality of treatment to all. We welcome positive or negative feedback from any individual that has been directly affected by our services. We strive to think our learners have confidence that we will listen to their views and act upon them accordingly. All written correspondence will be acknowledged by us within 7 working days, any dissatisfaction received will be treated as a complaint.

Our aim is to provide our learners with a clear, precise process to follow when they feel the need to make a complaint and effectively communicate the process Asbestos Compliance Limited will follow to resolve the complaint.

We aim to ensure:

- The complaints procedure is an easy process to follow and is prompt and efficient
- All complaints are treated as a dissatisfaction with our level of service
- The resolution is to the complainant's satisfaction (explanation, apology, action taken)
- and our staff when dealing with the complaint are courteous, consultative, and responsive
- Complaints and feedback received is reviewed to help improve our products and services.

Everyone has the right to raise a complaint, so this policy will define the stages and procedures you would need to follow, guidance is as follows:

- The process you need to follow to raise a complaint
- The appropriate person who this should be directed to
- The timescales for the complaint to be investigated
- How and when you will be notified of the outcome.

Asbestos Compliance Limited will not accept a complaint under this policy if the complaint relates to any assessment decision or course results, please refer to NOCN

Raising Concerns and Making Complaints

All individuals can access the information about our complaint's procedures through our website or can request a copy by sending an email to trainingsupport@asbestos-compliance.co.uk. When communicating with us we are committed to providing equal opportunities for all.

A complaint can be raised by an individual, a group or a third party who is acting on behalf of someone else. If a third party is submitting a complaint on behalf of someone, they will need written permission from the complainant along with the written complaint which should then be presented to Asbestos Compliance Limited for acceptance.

Once Asbestos Compliance Limited have received a complaint an acknowledgement will be sent within 7 working days. The complaint will be reviewed in line with our policies and procedures and where necessary an investigation will be conducted. To ensure a fair and thorough process is followed the duration of the investigation will depend on the nature and severity of the complaint we receive at this stage, or the complexity of the response required. We do aim to provide this as soon as the outcome is available or within a maximum of 28 days.

How to Make a Complaint

Informal Process

We understand that most individuals who are not satisfied with a service would like it addressed and dealt with as soon as possible, therefore an informal process would be far more appropriate.

An informal process will be more efficient resolving complaints quickly by mediating between who is responsible for the dissatisfaction and the complainant. The complaint may be resolved immediately following this process, so we encourage our learners to contact us directly for an informal discussion if they have a complaint that needs to be resolved to achieve the desirable outcome.

If a complaint cannot be resolved informally then the formal complaints procedure should be followed. We may require further information from the complainant to ensure we fully understand what the complaint entails, we will investigate accordingly to achieve the best outcome.

Formal Process

Stage 1

If the complainant is not satisfied with the outcome from the informal process the dissatisfaction should be submitted in writing by email to Asbestos Compliance Limited. Once we have received this information, we will send acknowledgement of receipt to the

complainant within 7 working days and an investigation to resolve the dissatisfaction will commence.

Asbestos Compliance Limited will identify an appropriate manager to review the complaint for further investigation and the complainant will be notified of the individual responsible for this. The member of management will conduct a further investigation in to the complaint, upon completion of the investigation they will communicate and notify the complainant and provide them with an explanation or resolution.

To ensure a fair and thorough process is followed the duration of the investigation will depend on the nature and severity of the complaint we receive at this stage, or the complexity of the response required. We do aim to provide this as soon as the outcome is available or within a maximum of 28 days of receiving the stage 1 complaint. In some cases, this may take longer to conclude the complaint with an outcome, in these instances the complainant will be notified of revised timescales.

If the complainant remains dissatisfied with the outcome from the manager's investigation the next steps to pursue are stage 2 of the complaint's procedure.

Stage 2

If the complainant is not satisfied with the outcome from the stage 1 complaints process, they are able to request a review of the complaint by a senior manager. This must take place within 14 days of the outcome of the original complaint and must be submitted in writing. The senior manager will determine if appropriate procedures were followed and the complaint was answered fully, if there is new evidence submitted in support of the complaint this will also be reviewed. Following review, we shall aim to notify the complainant in writing as soon as possible of the outcome, within a maximum of 28 days.

If the complainant remains unsatisfied with the final response, they may then refer the complaint to the appropriate regulatory authority i.e., Ofqual (England). Please see below for the relevant contact details.

Monitoring and Review

Asbestos Compliance Limited is committed to continual improvement, all complaints received by Asbestos Compliance Limited are reviewed to prevent re-occurrence, to improve the suitability and effectiveness of our policies and procedures and to contribute to the development of qualifications that are fit for purpose and meet individual needs.

Contact Details Ofqual (England)

Complaints

Ofqual

Earlsdon Park

53–55 Butts Road

Coventry

CV1 3BH

Tel: 0300 303 3344 (the phone line is open on weekdays from 09:00 to 17:00 *except bank holidays)

Website: ofqual.gov.uk

Email: complaints@ofqual.gov.uk

6.0 Appeals

This procedure details how a learner can appeal about an assessment decision.

The purpose is to:

- a) Ensure that decisions made by assessors and IQAs at Asbestos Compliance Limited are applied fairly, consistently and based on valid judgements.
- b) Outline the judgements or decisions made which can be appealed.
- c) Outline the staged procedure for how an individual can appeal against an assessment decision or judgement and the centres appeal process
- d) Outline the potential outcomes following an appeal.
- e) State the options for a learner once the appeal process has concluded.
- f) Satisfy the requirements of the Awarding Organisation.

This procedure is for:

All centre staff

Learners

Awarding organisation EQAs

N.B. This procedure is not applicable if a learner wishes to make a complaint about a member of centre staff or procedure at the centre. In such cases please refer to the Complaints Procedure.

A learner may appeal:

- a) An examination result.
- b) An assessment decision where the assessment has been carried out by a member of centre staff.
- c) The application by an awarding body of a sanction/action on an individual resulting from an investigation into malpractice or maladministration
- d) A decision to amend a learner/set of learners results following a malpractice or malpractice investigation
- e) An Awarding Organisation moderation or verification decision of a Centre marked assessment.
- f) A declined application for reasonable adjustment or special consideration.

The Appeal Procedure has 4 **Stages**, which are as follows:

Stage 1 – In the first instance the learner must discuss the issue with the Assessor who made the assessment decision. The discussion must include an explanation as to why the assessment decision was made and the learner must outline their grounds for appealing that decision.

If the matter has been discussed and no satisfactory outcome has been achieved, the appeal will progress to Stage 2.

Stage 2 – At the conclusion of Stage 1 the learner must raise the appeal with the IQA. The appeal must be recorded in writing.

The issue will then be investigated by the IQA who will make a decision and inform the learner of the decision within **5 working days** of receiving the appeal.

If the outcome is unsatisfactory for the learner, the appeal will move to Stage 3.

Stage 3 – The appeal will go to an Independent Third Party / Head of Centre to deal with and they will investigate the appeal, make a decision, and inform the learner of the outcome within **10 working days** of receipt of the appeal.

If the matter is still unresolved, it will move to Stage 4 and the learner may appeal directly to the awarding organisation.

Stage 4 – The learner should submit their appeal in writing to the awarding organisation within **10 working days** of receiving written notification from Asbestos Compliance Limited on the outcome of the appeal. Details for the appropriate awarding organisation will be provided.

Please note there may be extenuating circumstances where the timescale for each stage may have to be extended.

The following are possible outcomes of an appeal:

- a) Confirmation of the original decision
- b) The competence be re-assessed by the same or a different assessor
- c) A judgement that the evidence presented is an adequate demonstration of competence and a recommendation that the assessment decision be reconsidered
- d) The assessment decision is amended

7.0 Malpractice and Maladministration

This procedure details how Malpractice and Maladministration will be dealt with by Asbestos Compliance Limited

The purpose of this procedure is to:

- a) Provide guidance as to what constitutes malpractice and maladministration.
- b) The responsibilities of centre staff.
- c) Outline the procedure for dealing with cases of suspected malpractice.
- d) Outline potential outcomes

This procedure is for:

Centre Staff
Assessors
IQAs
Learners

What is malpractice and maladministration?

Malpractice is a deliberate or reckless act which threatens the integrity of qualifications and includes assessments and/or assessment outcomes. This includes dishonestly claiming learning outcomes and/or units for learners through fraudulent or deceptive means. Malpractice is an act that does not comply with the Qualification and Assessment Regulators' conditions and compromises the authenticity, reliability and integrity of qualifications, assessments and/or units

Malpractice can be conducted by any individual involved in the delivery, assessment, quality assurance, administration or study of a qualification. This include qualifications, units/assessments, end point assessments and examinations.

Maladministration is often an activity of poor practice rather than improper practice where there has been no intention on the part of the person responsible to do any harm. It may involve some degree of incompetence or ineptitude, or it may result from carelessness or inexperience.

To further aid understanding of what constitutes as malpractice, examples are within this section. The examples provided do not provide an exhaustive list of what constitutes as malpractice.

Examples of Centre Malpractice

- Failure to adhere to the Awarding Organisations suite of policies, procedures and associated documentation, including failure to promptly notify where instances of suspected or proven malpractice have been identified within the Centre.
- The deliberate submission of inaccurate CVs or invalid certificates to NOCN during Centre, staff or qualification approval processes.
- Provision of resources or materials to learners which offer improper assistance or provide an unfair advantage or disadvantage to learners during assessment.
- Providing adjustments or special considerations to learners which have not been approved by the awarding Organisation, where this is required.
- Excessive and improper direction from Assessors to learners during assessments on how to meet assessment criteria, including the provision of prompts or model answers.
- Deception through the manufacturing of learner evidence, records of observations, witness testimonies or any other assessment records.
- Failure to appropriately respond to and investigate suspected cases of malpractice or maladministration, including the failure to notify the Awarding Organisation.
- Utilising live examination materials for any other reason than the controlled assessment of learners, including using live examination materials, for training, for mock examinations or for the creation of Centre assessment tools.
- Failure to conduct external assessments in line with awarding organisation and qualification requirements, including failure to follow the required Invigilation Policy.

Examples of Learner Malpractice

Examples of malpractice which may be committed by a learner include, but are not limited to:

- Failure to acknowledge sources properly and/or copying from another's work or notes (either electronically or in person) and submitting it as if it their own (also known as plagiarism). This also includes unauthorised use of Artificial Intelligence (AI) tools, for example, a failure to acknowledge AI-generated content as a source, or submitting AI-generated content as if it were their own.

- Collusion with others when an assessment must be completed individually.
- Assuming the identity of another learner or having someone assume their identity during an assessment (also known as personation).
- Use of unauthorised aids or physical possession of unauthorised materials (including mobile phones, MP3 players, notes, textbooks, reference material etc.) in an assessment or examination room.
- Dissemination of secure examination and assessment material.
- Unauthorised communication with others during assessments.
- Providing a false declaration of authenticity regarding assessment completion.
- Failure to abide by the instructions or advice, including by Assessors and Invigilators, in relation to the conduct and/or completion of an assessment.
- Obtaining, receiving or exchanging of information which could be related to a secure assessment. This includes unauthorised talking or making notes during assessments or examinations.
- The inclusion of inappropriate, offensive or obscene material in assessment tasks.
- The deliberate destruction of another individual's work.
- Behaving in a disruptive or inappropriate manner in such a way which would undermine the integrity of an assessment.

A common form of learner/apprentice malpractice is known as plagiarism:

This is where the learner/apprentice fails to acknowledge sources properly and/or copies from another individual's notes or work (either electronically or in person) and submits the work as if it were their own.

Learners may be required to use and refer to information from a variety of published sources to demonstrate their knowledge and understanding. In doing so, they must ensure to that they do not claim this as their own work. Where a learner has included information from published sourced in their work, they must acknowledge this information fully and accurately by:

- Identifying their sources, in a brief format, in the body of their written work (referred to as in-text citation).
- Providing a detailed list of their sources in an alphabetical list at the end of their work (known as a reference list).

If a learner/apprentice fails to reference their sources, this can constitute as plagiarism and therefore malpractice. By correctly referencing information sources, a learner/apprentice can validate their statements or conclusions. Referencing is a mandatory requirement and could result in an outcome of an assessment being voided. Where elements of plagiarism are identified, it is required to be investigated in line with this policy and procedure.

Maladministration

Maladministration is an activity of poor practice rather than improper practice where there has been no intention on the part of the person responsible to do any harm. It may involve some degree of incompetence or ineptitude, or it may result from carelessness or inexperience.

Examples of maladministration include, but are not limited to:

- Poor, but mostly compliant, invigilation of external assessments.
- Failure to timely register learners or registering a learner against an incorrect product.
- Issuing of an incorrect certificate.
- Failure to submit a timely claim for certification following internal confirmation of achievement.
- Incorrect completion of examinations or assessments and their associated documentation.

There are a number of actions that may be taken against the centre, staff or learners if found to have been involved in malpractice:

Example possible actions against the centre:

- Prevention of registration or certification
- Additional quality monitoring
- Unannounced visits
- Withdrawal of Centre approval by the AO

Example possible actions against staff:

- Training for the individual.
- Subjected to further monitoring of their delivery of qualifications.
- Temporary suspension of their approval to deliver some or all qualifications.
- Permanent withdrawal of their approval to deliver some or all qualifications.

Example possible actions against learners:

- Amendment of an assessment mark or grade.
- Disqualification from the completion of a qualification or unit.
- c) Revoking of an issued certificate.

The above is not an exhaustive list

Centre Process for instances of Malpractice and Maladministration

Centre staff will ensure that an explanation of malpractice and maladministration forms a part of a learner's induction. All learners must receive an explanation, including examples, of malpractice and maladministration, as well as being informed of the consequences of them committing such acts. Learners must be asked to confirm their understanding of malpractice and maladministration in writing.

All Centre staff must be familiar with this policy and understand how to manage instances of suspected malpractice and maladministration.

All centre staff must make every effort to prevent and identify malpractice and maladministration.

Where malpractice or maladministration is identified or suspected it will be reported to Colette Willoughby/Training Manager, immediately. The person reporting must provide relevant evidence in relation to the suspected malpractice or maladministration.

Colette Willoughby/Training Manager must report the allegation to the appropriate Awarding Organisation within 1 working day of receiving the information, by email, to ensure an audit trail. The centre will seek guidance from the AO as to how the matter will be investigated, either by the Centre or by the AO.

Where the AO decides it will investigate the matter the centre will cooperate fully and provide access to premises, relevant documentation, systems, records, staff and learners as requested.

Where it is decided that the centre will investigate the matter then Colette Willoughby/Training Manager must decide who will carry out the investigation. The investigating officer will be independent of the individual(s) against who the malpractice is alleged, in order that they are able to take an objective view to the matter. The investigation will be concluded within 10 working days of receipt of the investigation request unless there are extenuating circumstances that will require a deadline extension. The investigating officer will negotiate this with the AO.

Where interviews are conducted with centre staff, these will be documented fully and where appropriate recorded. Centre staff will be informed of the allegation against them, be allowed to be accompanied by a third person when they are interviewed should they wish and provided the opportunity to provide evidence.

Where centre staff are treated as a witness any witness testimony will be recorded in writing or another other format.

The investigating officer will document all their actions on either the Asbestos Compliance Limited report or a report provided by the AO. The investigating officer will obtain and retain any relevant documentary evidence and make this available to the AO if requested.

At the conclusion of their investigation the investigating officer will draw conclusions from all the evidence gathered as to whether there has been malpractice and / or maladministration and will inform the Head of Centre. Where malpractice has been identified the investigating officer will make recommendations as to what action should be taken by Asbestos Compliance Limited to address the issues and to prevent a reoccurrence. In addition, where appropriate, they should also recommend action(s) to be taken against any person(s).

The report and any associated evidence will be sent to the relevant contact at the awarding organisation for consideration.

Asbestos Compliance Limited will consider any decision and actions by the AO and will look to implement any actions in an agreed timescale.

8.0 Contingency Plan

If a situation occurred where Asbestos Compliance Limited were to cease trading then full co-operation would be provided to NOCN to safeguard the interests of all learners registered with Asbestos Compliance Limited. That co-operation would include matters such as providing the details of any learners not yet registered with NOCN so as to allow alternative arrangements for learning to be made.

9.0 Data Protection Policy

Asbestos Compliance Limited are registered with the Information Commissioner's Office (Ref: A8656016) and will retain this registration at all times whilst trading and offering NOCN qualifications.

When handling the personal data of candidates Asbestos Compliance Limited will adopt the follow principles:

- personal data shall be processed lawfully, fairly and in a transparent manner in relation to individuals;
- personal data shall be obtained for one or more specified, explicit and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes;
- personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- personal data shall be accurate and, where necessary, kept up to date;
- personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

10.0 Internal Quality Assurance Policy

The aim of this policy is to ensure consistency, quality and fairness of marking, grading and the overall assessment of learner work. The assessment and internal quality assurance policy is in place to guide assessment practice in order to ensure that, where applicable, all assessment decisions meet required standards and contribute to learner achievement.

This policy aims to:

- Provide high quality and consistent assessment and internal quality assurance (IQA) practice across all courses for all learners
- Meet the requirements placed by the awarding body
- Promote a framework for fair, accurate and timely assessment that enables learners, to complete and submit work for assessment in ways that reflect good practice
- Promote standards of feedback that aid learner progress and achievement
- Ensure assessments are valid, reliable and unpredictable.
- Ensure that marking is accurate and consistent across all markers

Internal Quality Assurance Processes

The internal quality assurance processes involve the implementation of planned sampling activities across all learners, all assessors and all types of assessments. As part of this planned activity assessors are appraised and supported in their individual professional development as assessors.

The Role of the Internal Quality Assurer

The Internal Quality Assurer (internal verifier) is responsible for ensuring that the systems in place to achieve transparency, consistency, fairness, reliability, authenticity and sufficiency are effective and managed in such a way that the reliability and validity of every qualification awarded has been quality assured.

The internal verifier has the remit to adjust the marks originally awarded where necessary to ensure consistency of assessment across all assessors.

A minimum of 10% of all assessments for all assessors will be internally verified and quality assured. However, all the marking carried out by new assessors for their first cohort of students will be internally quality assured by the internal verifier. IQA reports provide the basis for giving valuable feedback to assessors on their application of the relevant assessment criteria. This leads to greater consistency in assessment.

The Internal Verifier

The Internal Verifier will be a named and suitably qualified person, holding the Certificate of Competence in Asbestos with experience in carrying out internal quality assurance activities. The Internal Verifier will have no involvement directly with the delivery of the course.

The Assessments

Each course will be assessed upon completion with candidates logging into their personal on-line account. The assessment will vary dependent upon the qualification in question from multiple choice style questioning through to scenarios and essay type assessments. The assessments will cover all units within the course with sufficient question banks to ensure regular rotation of set papers. As a minimum there will be 3 versions for scenario and essay type assessments at any given time with multiple choice assessments being randomly generated from a large question bank.

Moderation of Assessments

The Internal Verifier will quality sample the marked assessments and provide feedback to the assessor using the Internal Quality Assurance Sample Record form. The original marking will be evaluated against the relevant marking criteria, taking account of comments and points raised by the assessor and then finalises the marks to be awarded.

Internal quality assurance must take place before assessment decisions are finalised and notified to learners. Learners should normally receive assessment decisions no later than 15 working days after submission. Within this period relevant IQA sampling must have taken place as well.