

# **Post-Recognition Monitoring Report**

The Institute of Leadership and Management (ILM)



February 2011

Ofqual/11/4867

# Contents

- Introduction ..... 3
  - Regulating qualifications ..... 3
  - Banked documents ..... 3
  - About this report..... 4
  - About ILM..... 4
- Management and governance ..... 6
  - Findings ..... 6
  - Non-compliance ..... 7
  - Observation..... 7
- Resources and expertise ..... 8
  - Findings ..... 8
  - Non-compliance ..... 10
  - Observations..... 10
- Diversity and equality ..... 11
  - Findings ..... 11
  - Non-compliances ..... 12
  - Observations..... 12
- Development of units and rules of combination for qualifications ..... 13
  - Findings ..... 13
  - Non-compliance ..... 14
  - Observations..... 14
- Design and development of assessment..... 15
  - Findings ..... 15

Non-compliances .....	16
Observations.....	16
Delivery of assessment .....	17
Findings .....	17
Non-compliance .....	18
Observation.....	18
Centre recognition .....	19
Findings .....	19
Non-compliance .....	20
Observation.....	20
Awarding and certification .....	21
Findings .....	21
Non-compliance .....	22
Observation.....	22

## **Introduction**

### **Regulating qualifications**

The responsibility for regulating qualifications lies jointly with three regulators:

- Office of Qualifications and Examinations Regulation (Ofqual), the regulator for qualifications awarded in England and vocational qualifications awarded in Northern Ireland
- Department for Children, Education, Lifelong Learning and Skills (DCELLS), the regulator for Wales
- Council for the Curriculum, Examinations and Assessment (CCEA), the regulator responsible for qualifications (other than vocational qualifications) awarded in Northern Ireland.

We systematically monitor awarding organisations and their regulated qualifications against the requirements set out in the statutory regulations. The aim of this activity is to promote continuing improvement and public confidence in the quality of regulated qualifications.

Where an awarding organisation is found not to comply with relevant criteria, the regulators will identify areas of non-compliance that must be rectified within a certain period. Even if an awarding organisation is compliant, the monitoring team may provide observations on ways in which the awarding organisation could change its systems and procedures to improve clarity or reduce bureaucracy.

Non-compliances and observations arising from this monitoring activity are specified at the end of each section of this report. Awarding organisations are required to produce an action plan to show how they will deal with the non-compliances identified. We will generally agree the action plan and monitor its implementation.

We will use the outcomes of monitoring and any subsequent action taken by awarding organisations to inform decisions on future monitoring and/or the possible imposition of sanctions.

### **Banked documents**

As part of the awarding organisation recognition process, the regulators require awarding organisations to submit certain documents to Ofqual, to be held centrally. Information from these 'banked' documents is used to inform monitoring activities and may also affect an awarding organisation's risk rating.

A suite of documents has been identified as suitable for banking, consisting of those items considered to be the most crucial in supporting an awarding organisation's ability to operate effectively. To maintain the currency of the banked documents, awarding organisations are responsible for updating them as and when changes occur. They are also reminded to review them at least annually as part of the self-assessment return.

## **About this report**

This report is the outcome of a monitoring activity on The Institute of Leadership and Management (ILM) and was carried out by Ofqual and DCELLS staff between November 2010 and February 2011. It draws together the regulators' findings on areas of:

- management and governance
- resources and expertise
- diversity and equality
- development of units and rules of combination (RoC) for qualifications
- design and development of assessment
- delivery of assessment
- centre recognition
- awarding and certification.

This is the first post-recognition monitoring activity on ILM in respect of the Qualifications and Credit Framework (QCF) since the awarding organisation received supplementary recognition in 2010.

The monitoring activities included desk research of information already held by us, examination of ILM's supplementary recognition application and scrutiny of the awarding organisation's website. Our monitoring team visited ILM's head office to conduct interviews with staff and review documentation. Centres were also visited.

This report draws together our findings from these monitoring activities.

## **About ILM**

ILM is part of the City & Guilds Group but has independent awarding organisation status. ILM was originally known as the Institute of Supervisory Management, which

was founded in 1956. ILM was formed in November 2001 through the merger of the Institute of Supervisory Management and NEBS Management. The awarding organisation, as its name implies, offers qualifications mainly in leadership and management disciplines. For more information about ILM and the qualifications it offers, visit its website at [www.i-l-m.com](http://www.i-l-m.com)

## Management and governance

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 2.1–2.3, 5.1 and 5.17

### Findings

1. The Institute of Leadership and Management (ILM) is a company limited by guarantee and a registered charity. It is part of the City & Guilds group but produces separate financial statements. The directors' annual report is a model of clarity in setting out the corporate governance arrangements and management structures used to control the delivery of regulated qualifications.
2. As it is a charity and a limited company, ILM's nine board members are both directors and trustees. Five of the directors are appointed by City & Guilds and the remainder are elected by ILM's voting members. Day to day executive powers are delegated to a Chief Executive who is the single named point of accountability for all regulated functions.
3. ILM provided us with an organisation chart. We looked at both the terms of reference and the minutes of several committees and were satisfied with their content. We noted the existence of an advisory council that provides strategic support to the main board. Advisory council membership includes representatives from City & Guilds' Nations Advisory Boards as well as outside members.
4. A regulatory working group was set up in 2009. It is responsible for ensuring that ILM meets the regulatory criteria. Membership consists of senior staff, such as the Head of Quality and Administration and the Director of Qualifications and Learning Solutions. Its remit includes Scotland as well as England, Wales and Northern Ireland.
5. We consider ILM's management and governance arrangements to be robust and clear. No potential conflicts of interest were found.
6. ILM told us that it had been working with other organisations in respect of its regulated functions. No written statement of responsibilities had been produced, but ILM was not the lead organisation.
7. ILM provided us, in confidence, with details of its policy on fees. We were satisfied with the information provided.

## **Non-compliance**

There are no instances of non-compliance in relation to this section.

## **Observation**

1. ILM should ensure that, where it works in a consortium on regulated functions, the lead organisation provides a written statement of the responsibilities of each organisation.

## Resources and expertise

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 3.1, 4.1 and 5.2

### Findings

1. We discussed with the Chief Executive the procedures ILM had adopted to ensure that its staff and associates had the necessary expertise in the design and development of units and RoC to meet the requirements of the QCF. Evidence was provided in the form of CVs of selected staff against job roles and person specifications. There was also information on the training that had been provided in-house, as well as the external training taken up, for example at the Qualifications and Curriculum Authority/Qualifications and Curriculum Development Agency (QCA/QCDA), the framework developer.
2. ILM has a current workforce of 78 permanent members of staff. For the regulated functions of developing and submitting units, and developing RoC, ILM relies mostly on using existing members of staff and trains these to meet the demands of the QCF regulated functions. However, two new members of staff have been recruited as Development Managers in the Quality Learning and Support team to lead on projects developing qualifications for the QCF.
3. ILM has been involved in the QCF since tests and trials of the system began and staff members have attended briefing and training events in the national workshops provided by QCA/QCDA. Such training has then been cascaded throughout the organisation, enabling individuals to build up their knowledge and expertise in the QCF. In particular, appropriate staff attended a credit-rating and levelling workshop designed to provide training on the credit-rating and levelling of existing National Qualification Framework (NQF) units to meet QCF requirements.
4. During 2009/2010 ILM adopted the City & Guild's Group operational systems, including human resources and information technology provision. ILM contracts and purchases these services in pursuance of its human resource strategy which is formulated and developed by the Chief Executive and the Senior Management Team.
5. When the need to commit resources is identified, a business case proposal must be supported by the Senior Management Team. This must also be presented to, and endorsed by, the ILM Board.

6. The ILM business planning process is owned by the Chief Executive and follows a one-year cycle linked to a five-year model. The business plan is developed following consultation and direction both from the ILM Board and the City & Guilds Group. Objectives and activities are identified and established. The Senior Management Team reviews the objectives of the business planning process, and the Chief Executive reports to the City & Guilds Group Board on a monthly basis on performance and financial issues. There is a formal half-yearly review of the objectives by the Senior Management Team.
7. The business planning process results in the development of team and individual objectives being set incorporating performance and behavioural competencies. This is supported by a performance development review process for individual members of staff. Such reviews are carried out on a six-monthly basis and measured yearly.
8. There has been the need to introduce system technical changes to meet the demands of the QCF. This need was identified and a business case, developed following normal procedures, was approved and endorsed by the Senior Management Team, ILM Board and the City & Guilds Group Board. Resourcing was provided through the City & Guilds Group IT support system, defined in the IT service level agreement between ILM and City & Guilds.
9. As part of the ILM risk assessment process, a risk register is maintained. Business continuity and disaster recovery plans, based on business impact analysis, are in place to identify recovery and processing priorities. Off-site back-up and an alternative processing site in Lichfield are maintained. These arrangements have been tested and to date there has been no need to put them into action.
10. ILM has policies and procedures in place to ensure it has access to individuals who have expertise in the relevant subject or sector area for unit and RoC development, and assessment and awarding. These policies are included in person specifications and key accountabilities for staff and associates, both of whom have access to on-going training and guidance to support them in these functions.
11. We considered the access ILM has to expertise in the design and development of QCF units and RoC – in particular, the expertise required to determine credit and level of QCF units. This expertise has mostly been developed through participation in the QCF tests and trials, in-house and on the job training, and through the appointment of new staff. We felt that ILM's expectations in terms of credit and level expertise need to be made explicit and listed in the person specifications and key accountabilities for relevant posts.

12. ILM's reserves policy is clearly set out in its annual report and accounts. We saw that ILM had increased its reserve beyond the target level of six months' expenditure to cover unforeseen expenditure or a fall in income. We were satisfied that ILM was exhibiting a prudent financial view and was aiming to provide sufficient funds to support current and future demands for its services.

## **Non-compliance**

1. ILM must detail the additional expertise requirements for staff responsible for the design and development of units regarding determining the level and credit of units.

*(Regulatory Arrangements for the Qualifications and Credit Framework (August 2008), paragraph 3.1a)*

## **Observations**

There are no observations in relation to this section.

## Diversity and equality

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 2.11–2.14

### Findings

1. The Chief Executive has overall accountability for ensuring compliance with diversity and equality legislation within ILM, and responsibility is devolved through the Executive Team to each of its teams. The Senior Manager, Research & Policy, takes responsibility for developing all policies, including those for diversity and equality legislation.
2. ILM provides training to staff in diversity and equality through the City & Guilds Group-run training course 'Working with Awareness'. This is a one-off course which is carried out as part of ILM's induction programme. ILM associates, such as external verifiers and external consultants, do not receive any formal, regular training in diversity and equality.
3. Guidance is given to centres in the *ILM Centre Manual* about complying with equal opportunities. It encourages centres to be aware of the ILM Equal Opportunities policy and encourages them to undertake awareness training where appropriate. The manual was updated in October 2010, but no specific reference to either QCF or current legislative requirements for diversity and equality, in particular the Equality Act, were included.
4. Guidance on developing ILM units and qualifications is outlined in the *ILM Product Development Process* document (p13). A diversity and inclusion checklist must be completed. This is positive progress. However, on reviewing completed checklists, it was noted that decisions were often not justified and also sections of text were identical, implying that due consideration had not been applied to the exercise.
5. In terms of consultation groups, 'Customer Panels' are set up which largely consist of employers, training providers and colleges. These are used when new units are being developed. ILM chooses representatives that it believes will make the most significant input. There was no evidence of explicit consultation on diversity and equality matters; the panels focus on the sectoral content of the units and qualifications.
6. ILM makes appropriate reasonable adjustments to standard assessment arrangements wherever this is required to enable access. Guidance and an application form are included in the *ILM Centre Manual*, for both reasonable

adjustments and special consideration. However, it is not clear what external verifiers can or cannot give approval for at centre level. The manual states that external verifiers can agree 'minor adjustments and considerations'. This must be reviewed and made clear.

7. ILM acknowledged that data collection is a challenging area. Some data is collated through ILM's various functions, but it does not have adequate procedures in place to collect appropriate and sufficient data to allow it to effectively monitor and evaluate its compliance with sections 2.11 to 2.13 of the QCF regulatory arrangements.

### **Non-compliances**

2. ILM must put in place processes to ensure that any consultative groups pay due regard to diversity and equality, to ensure that there are no barriers to entry to the units and qualifications it develops.

*(Regulatory Arrangements for the Qualifications and Credit Framework (August 2008), paragraph 2.13)*

3. ILM must put in place procedures to collect sufficient data to monitor and evaluate its compliance with the regulatory requirements set out in the QCF arrangements 2.11–2.13.

*(Regulatory Arrangements for the Qualifications and Credit Framework (August 2008), paragraph 2.14)*

### **Observations**

2. ILM should review its policies and procedures to ensure that they meet in full the diversity and equality requirements of the QCF and the Equality Act.
3. ILM should ensure that specific training is given to its internal staff, external verifiers, consultants and developers in terms of the diversity and equality requirements of the QCF.
4. ILM should ensure that it reviews the approval process for reasonable adjustments and special consideration to make it clear to centres which assessment adjustments can be agreed by external verifiers, and which need specific agreement from ILM.

## Development of units and rules of combination for qualifications

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 3.2–3.4 and 4.2–4.4

### Findings

1. We were provided with a copy of *ILM Product Development Process*, which details both the strategic and commercial approach to product development, along with the operational processes for the development of units and RoC. This document would benefit from a review of the terminology used (e.g. QCA is still referenced).
2. The final decision on qualification development is made by the Chief Executive and is informed by a process of interaction with stakeholders, including employers, providers and sector skills councils, to ensure demand for the qualification and inform on-going development. Through this, good use is made of a range of provision planning tools.
3. Development work is undertaken on a project basis within the Qualifications and Learning Solutions Team. A Development Manager is allocated, who is responsible for overseeing the work and monitoring progress through a schedule that lists tasks and milestones. The scheduling document is not a standard template used within ILM, but the individual design of the Development Manager.
4. A series of checklists is used by the Development Manager to support development work. These checklists cover a wide range of processes that are ancillary to actual development of units/RoC, rather than evidencing how, when, and by whom, processes are undertaken. These documents on their own, therefore, lack detail to evidence that the regulatory requirements for unit and RoC design and development are followed systemically, although we were able to confirm verbally that this was the case.
5. We also noted that new procedures are being piloted that will enable a more definitive audit trail of processes through an additional tracking document entitled *Process for the development of QCF units and a qualification structure*. It is intended that this will provide a formal quality assurance sign-off for developments by the Director of Learning Solutions. If this is to be the case, more detail will need to be included on how the design requirements have been met.

6. Processes are in place for interrogation of the unit databank, and to ensure that unit and RoC development is undertaken by those experienced in both the sector and QCF regulatory requirements. Full use has been made of a variety of training on QCF unit and RoC development, with further training used to keep this knowledge and skill up to date.
7. Guidance is provided on calculating credit value. The process and outcome is recorded separately and is subject to expert review. Similarly, the process for determining unit level is recorded, with guidance being referenced to the QCDA guidelines for writing credit-based units of assessment. Quality assurance is carried out by the Director of Learning Solutions prior to submission to the QCF databank.
8. Procedures for on-going review of units are currently being developed alongside a 'root and branch' review of all qualifications, to ensure they fully meet regulatory requirements. This work will be supported by the documented unit development procedure in place and auditable paperwork that is being finalised. Whilst these actions, together with verbal confirmation at the visit, imply review is carried out in line with the regulatory arrangements, no auditable documentation is currently used.
9. Overall, the processes employed by ILM in unit and RoC development and review meet the regulatory requirements and design specifications. However, they would benefit from a more clearly defined audit trail.

## **Non-compliance**

There are no instances of non-compliance in relation to this section.

## **Observations**

5. The ILM Product Development Process document would benefit from a review to ensure that terminology used is up to date.
6. The processes employed in unit and RoC development and review would benefit from a more clearly defined audit trail that details the processes undertaken and the associated accountabilities, leading to review and submission to the framework. We were informed that further documentation to address this need is being developed.

## Design and development of assessment

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 5.3 and 5.16a

### Findings

1. We were provided with copies of the following documents:
  - *ILM Product Development Process* (within which appendix 10 details the procedure for designing assessments)
  - *ILM Strategy for Summative Assessment*
2. Work-based assessments are developed that group units. The quality assurance checks are not sufficient to ensure that assessments are written in a way that allows learning outcomes for individual units to be identified and for credit to be awarded for units where all learning outcomes are achieved. Therefore, it is not possible for each unit to be individually assessed and this situation is reflected in the document *ILM Strategy for Summative Assessment*.
3. Procedures are in place to ensure that skills, knowledge and/or understanding are assessed validly. However, particularly with centre-devised assessment, there is insufficient quality assurance to ensure that assessment provides sufficient evidence of achievement of all the learning outcomes for a unit, and therefore that credit is awarded correctly.
4. ILM has processes in place to consider the cost effectiveness of assessment and, through the diversity and equality checklist used as part of qualification development, to minimise the need for access arrangements.
5. Assessment development forms part of the draft checklist *Process for the development of QCF units and qualification structure* and it is intended that this checklist will be a formal quality assurance sign-off by the Director of Learning Solutions. If this is to be the case, more detail will need to be included on how the QCF regulatory requirements for assessment development have been met.
6. ILM confirmed that it does not grade qualifications.
7. Design of assessment is reviewed on an on-going basis by the ILM assessment teams, through standardisation and training events, and monitoring of centre activity.

## Non-compliances

4. ILM must ensure that work-based assignments are written in a way that allows the learning outcomes for individual units to be identified. It must be possible for credit to be awarded for units where all the learning outcomes are achieved and for each unit to be individually assessed.

*(Regulatory Arrangements for the Qualifications and Credit Framework (August 2008), paragraph 5.3b)*

5. ILM must ensure that assignments produce sufficient evidence to enable reliable and consistent judgements to be made on the achievement of all learning outcomes against the stated assessment criteria.

*(Regulatory Arrangements for the Qualifications and Credit Framework (August 2008), paragraph 5.3d)*

## Observations

7. The document *ILM Strategy for Summative Assessment* should be reviewed to ensure it reflects the requirements of the *Regulatory Arrangements for the Qualifications and Credit Framework*.
8. The processes employed in assessment development and review would benefit from a more clearly defined audit trail that identifies the processes undertaken and the associated accountabilities, to facilitate an informed sign-off by the Director of Learning Solutions.

## Delivery of assessment

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 5.5–5.6, 5.9–5.10 and 5.16b

### Findings

1. ILM uses two assessment methodologies.
2. Work-based assignments and reflective reviews are used for qualifications that do not assess competence in the workplace. These consist of mandatory and optional units, with assessment of the mandatory component currently carried out through ILM prescribed assessment. Optional units can be developed by either ILM or centres, although there are plans to allow centres to develop and assess all units.
3. Where a centre wishes to develop its own assessment, a detailed process is in place so that the assessment support team can confirm the quality of such assessments before allowing independent production on an on-going basis.
4. Competence-based qualifications are delivered through the assessor / internal verifier / external verifier model.
5. Systems are in place to ensure appropriate levels of expertise within the delivery system and on-going support of those involved, including monitoring of the work of all external verifiers and markers. Lead Assessors sample assessments and make accompanied visits to centres.
6. We were shown evidence of comprehensive verification/standardisation meetings, agendas and presentations for training events (including exemplar materials), showing that a range of issues, both at systems and qualifications level, are covered. Attendance at training events is a contractual obligation for all ILM external assessment staff.
7. The *Centre Manual* (version 3, p86) provides guidance on recognition of prior learning (RPL). However, in paragraph 2, this is confused with exemptions as defined within the QCF. There is no clear, detailed policy/procedure for how ILM will address claims for RPL/exemptions, although we were informed that these were being developed. A clearly defined audit trail that identifies the processes undertaken and the associated accountabilities will need to be put in place.
8. Systems are in place to ensure potential conflicts of interest within assessment delivery are appropriately managed and we were provided with evidence of

standardisation procedures that provide on-going quality assurance of assessment.

9. ILM has procedures in place to allow assessment in English, Welsh, Gaeilge and other languages, with associated systems to ensure comparability of assessment in different languages. Where assessment takes place in a language other than English, Welsh or Gaeilge, this is noted on the certificate issued to the learner.
10. Delivery of assessment is reviewed on an on-going basis by the ILM assessment teams, through standardisation and training events and monitoring of centre activity. This will be enhanced through future involvement with unit/qualification development and review.

## **Non-compliance**

There are no instances of non-compliance in relation to this section.

## **Observation**

9. The *Centre Manual* (version 3, section 6.9.3) should be reviewed to make clear the process for RPL and exemptions. The manual should reflect ILM policies on ensuring that achievement through RPL is recognised and explain how valid claims for exemptions will be considered and recorded

## Centre recognition

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008), paragraph 5.11

### Findings

1. ILM currently uses the Approved Centre Criteria, historically used for NVQ centre approval, in its approval process more than the QCF criteria.
2. ILM provided us with the following documents: *Approved Centre Criteria*, *ILM Centre Approval Guidance* and the *ILM Centre Manual*. These documents are provided to centres seeking QCF centre recognition.
3. The process for approving centres was described. The Quality Practice Team oversees the approval process. The centre is required to complete the *Approved Centre Criteria form*, evidencing where it meets the criteria. The Quality Manager visits the centres once applications are received.
4. The *Approved Centre Criteria* form requires centres to document a single named point of contact.
5. To demonstrate that staff resources are in place to support QCF assessments, ILM provided us with a staffing matrix, which is owned by ILM but holds details of the staff skills within a centre seeking approval. This matrix is updated by the centre and checked by ILM's quality managers.
6. ILM ensures that centres have arrangements in place to obtain a unique learner number (ULN) if required by the learner. A link can be found to the ULN website in the *ILM Centre Manual*.
7. ILM ensures that centres have administration systems in place to track the progress of learners towards their target awards. Its 'walled garden' electronic system provides both the centre and the external verifier with a tracking system that can generate an action plan for the progress of a learner.
8. The *ILM Centre Manual* requires centres to document, and record any changes to, roles and responsibilities in relation to partnership arrangements.
9. Centre visits identified occasional inconsistencies in external verifier activities. For example, there was not always sufficient evidence of candidates' meeting the standards, and evidence was not always properly authenticated. However, these seemed to be individual failings rather than systemic ones.

## **Non-compliance**

There are no instances of non-compliance in relation to this section.

## **Observation**

10. ILM's approved centre criteria are not easily reconciled with the particular QCF centre recognition requirements that are additional to the ones consistently used for current centre approval. ILM needs to realign its guidance to make it explicit to QCF centre recognition.

## Awarding and certification

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 5.12–5.16c–d

### Findings

1. ILM's principal method of assessment is by means of work-based assignments that the awarding organisation sets. Marking is carried out by centres and verified by internal and external verifiers along the lines of a national vocational qualification. ILM demonstrated to us how the awarding system works. The RoC is pre-set on the ILM computer system and unit results are fed into it from information received mainly by email. No claim for a qualification certificate is therefore required, as the system calculates it automatically from the unit results reported. Qualifications are not graded.
2. The use of email appeared to us to have certain weaknesses. Whilst credits could be awarded quickly, we had doubts about the full security, and hence accuracy, of the system. At the very least, it could be improved in the ways we outlined, in confidence, during our monitoring.
3. Otherwise, ILM showed us a system with strong procedures that checked and standardised over time the quality of centres' marking. Decisions were reviewed and adjusted where necessary.
4. The proposed central system for keeping the learners' achievements recorded has not yet been provided so ILM cannot record or amend anything on it. However, ILM is monitoring the progress being made, so that it can participate once the scheme is launched. It has adequate systems for recording exemptions and also for learners' achievements with other awarding organisations once shared units become available.
5. We looked at specimen credit and qualification certificates. These have been the subject of some discussion with the regulators and we did not consider them to be compliant in every respect. For example, one unit certificate had an incorrect qualification number and did not state that credit had been awarded. The specimen qualification certificate was difficult to interpret by a user such as an employer because superfluous information was included. We stated that revised versions of a credit, qualification and replacement certificate must be checked against the regulatory requirements and with the regulators before going live.

6. With regard to replacement certificates, we thought that the procedure for agreeing to issue these could be tightened, particularly where it suggests that certificates can be re-issued when the learner changes name. There are only two rare situations where this may occur: gender reassignment and witness protection.
7. ILM's procedures include regular review of its awarding activities, starting with quality audit officers visiting centres. Ultimately, the regulatory working group has responsibility for this.
8. ILM's system for the award and certification of credit and qualifications meets almost all of the regulatory criteria, but we felt that there were a number of aspects that could be improved. Junior staff made statements about how the system worked, which were subsequently corrected by senior staff. We did not carry out any detailed checking of items passing through the system because of the limited time available, but would recommend that a thorough check be made by ILM. This should be carried out by someone neither involved with, nor with responsibility for, the system.

## **Non-compliance**

6. ILM must review the design of its unit certificates and qualification certificates and provide samples, including replacement certificates, to the regulators. In addition, clearer procedures must be written for the issue of replacement certificates.

*(Regulatory Arrangements for the Qualifications and Credit Framework (August 2008), paragraphs 5.13 and 5.15, and appendices C and D)*

## **Observation**

11. ILM should review the security of its results collection system and also carry out a thorough review of the current system to ensure that junior and senior staff are in agreement as to how it is working.

We wish to make our publications widely accessible. Please contact us if you have any specific accessibility requirements.

First published by the Office of Qualifications and Examinations Regulation in 2011

© Crown copyright 2011

You may re-use this publication (not including logos) free of charge in any format or medium, under the terms of the [Open Government Licence](#). To view this licence, [visit The National Archives](#); or write to the Information Policy Team, The National Archives, Kew, Richmond, Surrey, TW9 4DU; or email: [psi@nationalarchives.gsi.gov.uk](mailto:psi@nationalarchives.gsi.gov.uk).

This publication is also available on our website at [www.ofqual.gov.uk](http://www.ofqual.gov.uk)

Any enquiries regarding this publication should be sent to us at:

Office of Qualifications and Examinations Regulation	
Spring Place	2nd Floor
Coventry Business Park	Glendinning House
Herald Avenue	6 Murray Street
Coventry CV5 6UB	Belfast BT1 6DN

Telephone 0300 303 3344

Textphone 0300 303 3345

Helpline 0300 303 3346