



Awarding body monitoring report for: Chartered Institute of Environmental Health (CIEH)

September 2008

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Contents

Introduction	3
Regulating external qualifications	3
Banked documents	3
About this report.....	4
About the CIEH	4
Corporate governance	5
Findings.....	5
Accreditation conditions	6
Observations	6
Resources and expertise	7
Findings.....	7
Accreditation conditions	7
Observations	7
Application of assessment methods: the quality assurance and control of internal assessment.....	8
Findings.....	8
Accreditation conditions	9
Observations	10
Application of assessment methods: the quality assurance and control of independent assessment.....	11
Findings.....	11
Accreditation conditions	12
Observations	13
Determination and reporting of results	14
Findings.....	14
Accreditation conditions	14
Observations	14
Registration and certification	15
Findings.....	15
Accreditation conditions	16
Observations	16
Monitoring and self-assessment.....	17
Findings.....	17
Accreditation conditions	17
Observations	18

Introduction

Regulating external qualifications

Responsibility for regulating external qualifications lies jointly with three qualifications regulators:

- the Office of the Qualifications and Examination Regulator (Ofqual)
- the Department for Children, Education, Lifelong Learning and Skills (DCELLS), the body for Wales
- and the Council for the Curriculum, Examinations and Assessment (CCEA), the authority for Northern Ireland.

Following the accreditation of a qualification, the regulators systematically monitor awarding bodies 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 external qualifications.

Where an awarding body is found not to comply with relevant criteria, the regulators set conditions of accreditation. Even if an awarding body is compliant, the monitoring team may make observations on ways that the awarding body could change its systems and procedures to improve clarity or reduce bureaucracy.

Accreditation conditions and observations arising from this monitoring activity are specified at the end of each section of this report. Awarding bodies are required to produce an action plan to show how they will deal with accreditation conditions imposed as a result of a monitoring activity. The regulators will agree the action plan and monitor its implementation.

The regulators will use the outcomes of monitoring and any subsequent action taken by awarding bodies to inform decisions on the re-accreditation of qualifications, or, if necessary, the withdrawal of accreditation.

Banked documents

As part of their awarding body recognition processes the regulators require awarding bodies to submit certain documents to Ofqual for the purposes of 'banking' centrally. Information from banked documents will be used to inform monitoring activities and may also affect the awarding body's risk rating.

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

About this report

This is the second monitoring activity on the Chartered Institute of Environmental Health (CIEH) and was carried out between July and September 2008.

The monitoring focused on the regulatory criteria relating to the following key areas:

- corporate governance
- resources and expertise
- application of assessment methods:
 - the quality assurance and control of internal assessment
- application of assessment methods:
 - the quality assurance and control of independent assessment
- determination and reporting of results
- registration and certification
- monitoring and self assessment

The monitoring activities included desk research of information already held by the regulators, attendance at awarding body meetings and scrutiny of the awarding body's website. The regulators' monitoring team visited the CIEH's head office to conduct interviews with staff and review documentation. Centres were also visited.

This report draws together the regulators' findings from these monitoring activities.

About the CIEH

Founded in 1883, the CIEH is a professional and educational body dedicated to the promotion of environmental health and to encourage the highest possible standards in the training and work of environmental health professionals.

For more information on the CIEH visit the website at www.cieh.org.

Corporate governance

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 5, 6 and 7.

Findings

1. The CIEH is incorporated and governed by its royal charter, which was granted in 1984. It is run by a board of trustees known as the council. Reporting to the council are three main committees. These are the resources committee, the policy development board and the education and professional standards board.
2. The single named point of accountability for maintaining the quality and standards of all accredited qualifications is the chief executive, to whom the council delegates many of its executive powers.
3. The education and professional standards board is the committee that controls the CIEH's qualifications, which include both those accredited by the regulators and those that are not. Beneath the education and professional standards board is the qualifications board. The CIEH has a number of professional qualifications that are not accredited by the regulators. It was not easy, without enquiry, to understand when the terms of reference of these two boards referred to qualifications accredited by the regulators.
4. The regulators examined minutes of both committees and had occasional difficulty in understanding which items concerned professional (non-accredited) qualifications and which concerned qualifications accredited by the regulators. The minutes contained appropriate reports on awarding body matters but the regulators considered that there should be greater clarity between the qualifications accredited by the regulators and those that are not.
5. Throughout the CIEH's activities there was a considerable emphasis on training. This may be appropriate for the CIEH but not for the awarding body, where the emphasis should be on assessment. There may be a legal requirement for employers to train their staff in environmental health matters but no evidence was produced to show that this requirement extends into any qualification. If the assessments are adequate then the awarding body has no need to insist on registration of the trainers.
6. Operational management of the awarding body is delegated to one of the CIEH's group companies, Chadwick House Group Limited. This company reports to the qualifications board on awarding body matters. The CIEH feels that this separation of

policy and operations across its group makes for better governance and guards against any potential conflicts of interest. The regulators were surprised to find that feedback to centres from the awarding body was sometimes provided on paper with only the Chadwick House Group Limited heading. The regulators understood that this practice ceased three years ago.

7. The regulators could not identify any potential for conflict of interest for accredited qualifications except in the CIEH's publications activities, since the CIEH does not offer training for the accredited qualifications. Any potential conflict of interest was adequately managed.
8. In summary, the regulators were satisfied with the awarding body's governance arrangements for its accredited qualifications, once explained, but felt that the information provided (such as organisation charts and terms of reference) could be improved to identify more clearly the existence of the awarding body within the larger group. This information would identify consultants employed in important roles such as chief examiners/moderators and lead curriculum managers.
9. The regulators discussed, in confidence, the policy on fees setting and were satisfied with the information provided.

Accreditation conditions

There are no accreditation conditions for this section.

Observations

1. The CIEH should redraw its organisation charts to show clearer reporting lines for its committees and make clear which terms of reference apply to the qualifications accredited by the regulators. Similarly, clarity should be maintained on the role of Chadwick House Group Limited within the awarding body. A separate awarding body chart covering only the activities of the awarding body for qualifications accredited by the regulators would be helpful.
2. The CIEH should consider whether it could separate its supervision of training performance from the people involved with the awarding body.

Resources and expertise

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 8 and 10.

Findings

1. The absence of an organisation chart for the awarding body makes the measurement of sufficiency even more difficult than usual where an awarding body forms part of a larger whole. Discussions on how the various activities of the awarding body are resourced revealed that approximately three quarters of the 100 Chadwick House Group Limited staff are employed in awarding body activity.
2. Consultants are also employed to cover key areas of qualification assessment. Evidence was provided to show the technical resources at the awarding body's disposal and there was no sign of any pressure on the awarding body's activities as a result of any lack of resources.
3. The regulators examined a sample of staff files and found evidence of job and people descriptions together with application forms and associated CVs that met the requirements. Training and appraisal records were also held in these files.
4. The CIEH has comprehensive procedures in place for recruitment or accessing the skills it requires to run the awarding body. The most difficult area to evidence competence in the awarding body was in its commissioning of people or agencies to translate multiple-choice questions into foreign languages. However, the awarding body insists on a separate evaluation of the work provided by the originator. The number of people with the linguistic and subject skills is necessarily limited.
5. The regulators were satisfied that there is no evidence of pressure due to lack of resources or expertise at the awarding body.

Accreditation conditions

There are no accreditation conditions for this section.

Observations

There are no observations for this section.

Application of assessment methods: the quality assurance and control of internal assessment

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 13, 36, 38–42, 56–57 and 59–62.

Findings

1. Centres mark assignments following mark schemes provided by the awarding body. Centres do not set any assessments themselves. Evidence of authenticity of work is provided by the candidate and internal marker signing the assessment record. A procedures manual that outlines the requirements for authenticating candidates' work is given to the centres.
2. All assessment is in English and is submitted to the CIEH for moderation. There is no internal moderation. All assessment records are held centrally. Centres are asked to copy assessments before submission in case they go astray in transit.
3. The CIEH has written procedures for markers and moderators. Annual training events are held to supplement this guidance. These result in a standard approach by moderators. Potential conflicts of interest by moderators are declared and a record is kept by the CIEH that can be used when allocating work. Similar procedures apply to the examiners for independent assessment.
4. Training of internal markers no longer takes place. Reliance is placed on marking schemes and exemplar material as well as the written instructions provided. The CIEH indicated that it provides guidance to centres when difficulties are identified through the moderation process. Centres' views on the quality of guidance provided by the awarding body was mixed. The general view was that change is poorly communicated but support is good.
5. Visits to centres are scheduled by awarding body staff and outcomes recorded on an audit form. Visits focus on the checking of the provision of information to candidates on the awarding body's behalf and also on the training quality. However, the centres visited reported very little contact with awarding body representatives. The regulators identified items that should be shared with candidates if best practice were applied. The regulators indicated that the customer service statement could carry a sign-post to these items since centre visits were clearly infrequent. The CIEH would only need to ensure that a single document was provided to candidates. This would remove some of the danger of candidates claiming ignorance of important matters.

6. There is no guidance on the extent to which candidates can be allowed to redraft their work before it is assessed or the limits on the assistance that internal markers can give to candidates on work that is to be assessed. Candidate evidence may not, therefore, be reflecting the abilities of the candidate.
7. Feedback is provided to markers on a batch by batch basis by the moderator. These are looked at by the curriculum manager before re-appointment of the moderator takes place, but no formal report on each moderator's work is currently prepared. The CIEH keeps a note of the number of moderators employed to help ensure consistency by using the minimum number required. A similar process monitors the number of examiners.
8. Sampling is carried out centrally and the sample sent to the moderator. The sampling strategy is set out in the instructions for moderators and other publications of the CIEH. It is based on a batch system per assessor and selects from across the range of marks allocated.
9. Where moderators are dissatisfied with the marking beyond a 10 % tolerance, they return the sample to the CIEH, which then arranges to have the whole batch second marked. The resulting marked batch is then sent to the original moderator for the result to be confirmed.
10. The regulators observed that the assessment results document is cumbersome, requiring moderators to carry out a number of arithmetical calculations to arrive at the final mark. There is no space on the document to show what the final mark agreed is where second marking has occurred. The CIEH asserted that the raw marks are also entered on the computer so any arithmetical errors are discovered. The regulators considered that the assessment results form should be redesigned if its arithmetic was unimportant.

Accreditation conditions

1. The CIEH must provide information to internal assessors on the:
 - extent to which candidates can be allowed to redraft their work before it is assessed
 - limits on the assistance that they can give to candidates on work that is to be assessed

(The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004), paragraphs 60c and 60d).

2. The CIEH must produce reports on the work of each moderator (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 61f).

Observations

3. The CIEH should keep under review the need to offer training to the internal markers.
4. The CIEH should consider how candidates receive information from the awarding body via centres. Visits to centres should be increased in frequency to monitor this.
5. The CIEH should review the design of the assessment results document.

Application of assessment methods: the quality assurance and control of independent assessment

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 13, 36, 38–42 and 56–58.

Findings

1. There are two types of independent assessment provided by the CIEH. One is a conventional written examination and the other is a multiple-choice examination, which constitutes by far the largest number of assessments. Examination regulations are provided to centres in the procedure manual.
2. A member of the regulators' monitoring team attended an examination paper review meeting and was satisfied at the quality and thoroughness of the process, including checking coverage of the specification.
3. The awarding body relies upon its centres to identify candidates and could go further in guiding centres as to what constitutes acceptable proof of identity. This is important since the awarding body registers candidates who sit its multiple-choice examinations from the optical character recognition form. This is machine read to assess the candidates' answers and certificates achievement on the same day. Such a swift operation requires confidence in the candidates' identity. Visits to centres revealed a lack of awareness of the importance of identifying candidates.
4. Many of the multiple-choice examinations are offered in languages other than English. The CIEH has no specific procedures for ensuring that assessment is comparable to that offered in English/Welsh/Irish (Gaelige).
5. The CIEH cannot know the level of competence in English/Welsh/Irish (Gaelige) of its candidates when it certifies them. The CIEH asserted, but produced no evidence, that the lack of English/Welsh/Irish (Gaelige) did not prevent the candidate from properly carrying out the role that is supported by the qualification. The regulators asked for some support for this view from the industry since its enquiries on an ad hoc basis had produced the opposite view. Centre visits by the regulators revealed a body of opinion that the inability to read labels in English was potentially dangerous.
6. Where multiple-choice papers are provided in languages other than English, the CIEH is alert to the difficulties inherent in translation. These can alter the information being given to candidates. The CIEH ensures that it takes account of any feedback

from candidates in this respect. In addition to other checks, it provides candidates with a copy of the examination paper in the original language (English) so that those capable of doing so can cross-check the translation.

7. The regulators' representatives examined the papers in languages where they were competent and only found a small error similar to a typographical error (a missing accent). This did not change the meaning of the word and was intelligible to a native speaker of that language.
8. For conventional written examinations the CIEH carries out adequate moderation of examiners' work, with batch by batch feedback. Evidence was also provided of suitable statistical analysis of multiple-choice questions' performance. A member of the regulators' team attended a moderators' and examiners' training day and found this to be relevant and helpful to those attending. It covered issues such as interpreting mark schemes and administrative procedures. Attendance is mandatory.
9. The security procedures for examination papers and answer sheets are comprehensive.
10. The CIEH ensures it uses the minimum number of examiners and that they declare any potential conflicts of interest.

Accreditation conditions

3. Where it offers assessment in a language other than English/Welsh/Irish (Gaelige), the CIEH must ensure that:
 - assessment is comparable to that offered in English/Welsh/Irish (Gaelige)
 - it produces evidence that the lack of proficiency in at least one of those languages does not prevent the candidate from properly carrying out the role that is supported by the qualification

(The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004), paragraphs 40a and 40b).

4. The CIEH must provide guidance to centres on what constitutes suitable proof of identity *(The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004), paragraph 57a).*

Observations

6. The CIEH should investigate what research there has been on translating multiple-choice questions into another language.

Determination and reporting of results

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 63–67.

Findings

1. The regulators were generally satisfied with the CIEH's arrangements for the determination and reporting of results. Pass marks were agreed by various steering groups and clearly stated in all documentation produced for centres, and information also appeared on the website. Comprehensive records were kept centrally. Qualifications were well mapped to the specifications, including multiple-choice examinations.
2. The main weakness was that no check was currently made on the moderators' decisions but this had been addressed by the CIEH following its self-assessment submission.
3. The CIEH sets out clearly how the results of individual assessments are aggregated to arrive at a result. The criteria for grades are clearly stated. The only improvement is in communicating the meaning of grades to users of its qualifications by means such as setting out this information on the backs of the certificates.

Accreditation conditions

There are no accreditation conditions for this section.

Observations

7. The CIEH should consider how it communicates the meaning of its grades to users of its qualifications.

Registration and certification

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 11–12, 21–24 and 25.

Findings

1. The CIEH has procedures in place to approve and register its centres. Much of the information requested of a centre concerns its training delivery and checking the competence of trainers, for which the CIEH charges a fee. The regulators questioned the emphasis on training, as was mentioned earlier in this report in the section on governance.
2. The application form requires the centre to name the single point of accountability but those specimens provided by the awarding body did not have this information completed.
3. The assurance that centres would use buildings that provide access for all candidates, and the undertaking to allow access to premises, people and records by the awarding body and regulators are not set out on the centre agreement but by reference to the policies and procedures associated with it. This met the criteria but the regulators considered that it was better practice to have these important statements on the agreement itself.
4. Once approved, centres are given a procedure manual that guides them on a variety of matters, including information the awarding body wants the candidate to have.
5. The awarding body had provided all data that the regulators had asked for in the past. The criteria do not specify exactly what should be kept. The regulators suggested that the CIEH should consider as a guide the information required in the national vocational qualification (NVQ) code.
6. The CIEH does not inform its clients that the regulators' logos on the certificate indicate that the qualification is accredited only for England, Wales and Northern Ireland.
7. The design of the certificates appeared to be satisfactory but on seeing their production it became clear that the date on a level 2 certificate was the date of the multiple-choice examination and not the date of the certificate's issue. As a result, given that the CIEH registers many of its candidates by using the multiple-choice examination answer sheet information, an audit trail would show that the certificate pre-dates the registration.

8. There is no unique identifier on the certificate. This produces risks. For example, if a first print of a certificate is smudged and another is produced they bear exactly the same number. If the faulty copy were to find its way out of the awarding body in error or otherwise, there would be identical certificates in circulation without the awarding body having the ability to distinguish between them.

Accreditation conditions

5. The CIEH must inform its clients that the regulators' logos on a certificate indicate that the qualification is accredited for England, Wales and Northern Ireland (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 21b).
6. The CIEH must produce certificates that are in accordance with the regulators' design requirements with:
 - date of issue
 - unique identifier

(*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 22a and appendix 5).

Observations

8. The CIEH should check its centre registration forms have been completed, or redesign them, to ensure there is no debate about who is the single named point of accountability for the quality assurance and management of qualifications.
9. The CIEH should consider putting the undertaking concerning candidate access to premises and providing the awarding body and its regulators with access to premises, people and records on the agreement a centre signs rather than on a separate document that it agrees to observe.
10. The CIEH should review the statistical data it keeps and consider incorporating details such as the gender of its candidates. Reference may be usefully made to the NVQ code.

Monitoring and self-assessment

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 20, 27, 33–35 and 37.

Findings

1. The CIEH has not had formal procedures in place to monitor its compliance with the regulatory criteria. Instead it has relied on a series of management meetings. Evidence was seen of the agenda for such meetings with relevant issues scheduled for discussion. The CIEH is in the process of putting written procedures in place but this was not clearly stated in the September 2007 self-assessment report and action plan.
2. Centres are encouraged to feed back comments to the awarding body on its activities. The CIEH found it more difficult to access the opinions of candidates and employers, especially as it knows nothing of its candidates ahead of simultaneous registration and assessment for the bulk of its candidates. The identity of the candidate's employer is not requested on registration.
3. The CIEH's monitoring of its centres concentrates on their training method and quality. Centre monitoring did take place on a structured basis. However, visits to a random selection of centres showed that some had not received a visit for several years.
4. The CIEH had submitted its self-assessment for 2007 to the regulators and was working to address the feedback received. Procedures had not been in place to monitor and evaluate the use of reasonable adjustments and special consideration but this had been introduced recently. A report was going to the curriculum managers' meeting.
5. Similarly, monitoring of enquiries and appeals had not been carried out until identified in the 2007 self-assessment. The first report was due in 2008.
6. Customer service targets were in place and were monitored.

Accreditation conditions

7. The CIEH must have procedures in place to monitor its compliance with the criteria. These must include specific procedures to facilitate its monitoring of:
 - reasonable adjustments and special consideration

- enquiries and appeals
- centres' work, increasing the frequency of visits to ensure all centres are visited regularly

(The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004), paragraphs 20, 27, 33a and 35).

Observations

11. The CIEH should review its procedures for monitoring centres.