



# **Awarding body monitoring report for: Chartered Institute of Building (CIOB)**

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# Introduction

## Regulating external qualifications

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

- the Office of the Qualifications and Examinations 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 Building (CIOB) and was carried out between August 2008 and January 2009.

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 assessment
- determination and reporting of results
- registration and certification
- malpractice
- equality of opportunity, reasonable adjustments and special consideration
- customer service
- enquiries and appeals
- monitoring and self-assessment

The monitoring activities included desk research of information already held by the regulators, visits to meet external verifiers, visits to centres approved by the awarding body and scrutiny of the CIOB's website. The regulators' monitoring team visited the CIOB's head office to conduct interviews with staff and review documentation.

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

## **About the CIOB**

The CIOB traces its origins back to 1834. It was awarded its royal charter in 1980. The CIOB is a professional organisation with over 42,000 members. It provides access to expertise in all aspects of construction management.

For more information on the CIOB visit its website at [www.ciob.org.uk](http://www.ciob.org.uk).

## Corporate governance

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

### Findings

1. The CIOB is incorporated by royal charter. The council is its governing body and is supported by a number of subsidiary committees and boards. The CIOB has its own awarding body, which has no separate legal entity or accounts. There are also joint awarding body arrangements to which the CIOB is a party. The regulators only looked at the activities of the sole awarding body for this monitoring activity.
2. At the time of monitoring, the CIOB was in the course of changing its board and committee structures. For evidence of past performance the regulators read minutes of various committees that are soon to be replaced (or renamed). The regulators also examined the proposed terms of reference of the new committees.
3. The CIOB has a large educational remit. Control of the sole awarding body to date has been exercised mainly by the vocational educational panel, which approves centres, approves the appointment of external verifiers (EVs) and monitors the information contained in EV reports. Reading the most recent minutes of this committee, however, revealed that the committee had many other responsibilities.
4. The CIOB's sole awarding body activities are not sufficiently evidenced as being supervised by the vocational educational panel. The reports that an awarding body should be making were not found in the minutes. In particular, after visiting centres and contacting external verifiers, the regulators had concerns about past lack of control of awarding body activity in respect of awarding, certification and standardisation of centre-produced assignments. The new committee must satisfy itself that these weaknesses are remedied immediately. More detailed comment on the areas of weakness appears in other sections of this report: application of assessment methods, determination and reporting of results, and registration and certification.
5. A new committee is being set up (the awarding body management committee). It has a reporting line through the educational qualifications standards and practice board to one of the four committees that report directly to the Board of Trustees. A copy of the draft terms of reference for the awarding body management committee was provided to the regulators. They noted that six of the seven listed responsibilities are for the CIOB sole awarding body. The other responsibility is for the joint awarding body. The

regulators would expect the minutes of future meetings to cover the sole awarding body's activities adequately.

6. The CIOB needs to bank the changes in its organisation structure with the regulators. At the time of writing there is no need for an accreditation condition for this action and there is merely an observation recorded to remind the awarding body of the proper course to be followed. If the CIOB does not go ahead with its proposed changes it must inform the regulators since the existing structure has been largely ignored during this monitoring activity.
7. The senior end of the staff organisation chart is little changed by the new committee structure. The chief executive remains the single named point of accountability for maintaining the quality and standards of the qualifications. This responsibility appears in the chief executive's job description.
8. Of the two people with effective responsibility for the day to day running of the awarding body, one of them reports to the director of professional and technical development and the other reports to the director of change management, membership and business development. Both directors report to the chief executive.
9. To date, many activities of the awarding body are carried out because of the skill and knowledge of the current staff. Documented procedures are minimal in some areas, but sufficient (e.g. flowcharts). In others they are not yet written and these are commented on under the appropriate sections of this report.
10. The regulators considered that robust and transparent governance arrangements were being proposed but would benefit from a fuller set of documented procedures. The governing committees must ensure they exercise control over the awarding body's activities.
11. The regulators discussed, in confidence, the policy on fees setting and were satisfied with the information provided.

## **Accreditation conditions**

1. The CIOB must advise the regulators whether the proposed changes in governance have taken place (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 6a and 6c).
2. The CIOB must ensure that:
  - its committees exercise effective control over its sole awarding body activities

- minutes of committees evidence the receipt of relevant reports from the awarding body and effective supervision being exercised by the committees
- internal procedures are reviewed and expanded where necessary  
*(The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004), paragraph 5a).*

## **Observations**

1. The CIOB should draw up and bank a sole awarding body organisation chart that reflects its new governance arrangements. Terms of reference and committee membership need to be provided.

## Resources and expertise

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 6c, 8 and 10.

### Findings

1. The CIOB provided full access to its records and staff. The CIOB has a permanent staff of approximately 140 which it augments with EVs and volunteers from its membership, where required. Sample job and person descriptions were provided.
2. Assessment of the current qualifications is entirely by means of internally assessed assignments, the majority of which are produced by its centres. For those key units where the CIOB provides the assignments, it depends upon the academic expertise of its members to be volunteered to a working group. Awarding body staff members service the working groups with secretarial support.
3. The regulators scrutinised the information provided and were satisfied that the CIOB possesses the expertise required to carry out the functions of an awarding body.
4. Methods of recruitment were described verbally by awarding body staff. Recruitment of members to volunteer their special skills is typically done by recommendation, as in many professional organisations. Permanent members of staff are recruited by human resources systems that involve clear job descriptions and person specifications. EVs are recruited by recommendation or advertisement and their CVs are vetted by the vocational education panel against the EV specification. Annual training is provided for all EVs. If the chief verifier considers it necessary, EVs also undergo an induction process.
5. It was necessary for CIOB staff to explain to the regulators the match of awarding body activities with the staff organisation chart. This was because the awarding body has no dedicated team of staff and all have substantial other responsibilities.
6. A separate organisation chart for the sole awarding body, with names, would be useful in helping the CIOB to identify the diversity of reporting arrangements for relevant staff. It would also display clearly the lack of a dedicated awarding body team. The regulators only identified a small number of people for whom the awarding body was a major part of their responsibilities.
7. There is no routine supervision being exercised over the awarding body. Activities are not being converted into procedures for a permanent record. Staff members know what to do but if they are unexpectedly absent continuity of performance cannot be

guaranteed. Staff stated that in their absence some actions do not occur until they return to work. These are in areas that affect customer service.

8. Departments that serve the awarding body and help it meet its service levels are left to monitor and evaluate their own performance. The awarding body should be part of the process since, if conflicting pressures arise, the department may be satisfied with the resolution of the problems but the awarding body's customers may not.
9. The current staff members are fully committed to meeting the regulatory requirements at a time of considerable change. However, there are a number of static documents that need amendment to bring them into line with statutory regulation criteria published four years ago. Certificate designs are several years out of date. This is the most compelling evidence of the need for the CIOB to give the sole awarding body a fuller presence within its organisation. A committee will find it difficult to exercise this level of detailed control without proper administrative support.
10. In conclusion, the regulators felt that the resource and expertise was available but not yet organised to meet its full potential.

### **Accreditation conditions**

3. The CIOB must ensure that effective review and monitoring of the sole awarding body is adequately resourced at operational level. A detailed organisation chart of the sole awarding body, with roles and names, is essential (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 10).
4. The CIOB must satisfy itself that there is adequate cover for key posts and review the sufficiency of its internal procedures manual (or equivalent) (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 8).
5. The CIOB must ensure that the documentation the regulators require to be banked is brought into line with the current criteria (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 6c).

### **Observations**

2. The CIOB should review how departments self monitor their performance for the sole awarding body.

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

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 13, 36, 38–42 and 56–61.

### Findings

1. There are three accredited qualifications offered by the CIOB's sole awarding body:
  - level 3 certificate in site supervisory studies
  - level 4 certificate in site management
  - level 4 diploma in site management
2. The qualifications have been running for a considerable period of time in first non-accredited and then accredited forms. The CIOB considers that they are highly regarded by the industry. All assessments are currently in English, although the CIOB would respond to requests for assessment in other languages if there was demand. Each qualification is achieved by accumulating a set number of mandatory and optional units on a pass or fail basis (typically a half-dozen or dozen units per qualification). All the units are assessed by means of assignments.
3. The awarding body sets the assignments for the mandatory units. A working group of CIOB volunteers produces these and they independently check each other's work. The vocational education panel checks the volunteers' competence and the assignments they produce.
4. The CIOB stated that the centrally set assignments have a life of about five years. They are reviewed annually by the education manager to accommodate any changes due to legislation or other cause. This activity is not recorded in any procedure. The awarding body must have more detailed systems and procedures for assignment production to ensure consistency.
5. Centres set their own assignments for the rest of the units. Centres are expected to use the syllabus as the basis for these. The syllabus does not contain any information on how the qualifications are to be assessed. There is no other guidance except any provided verbally by their external verifier and of which no evidence is necessarily kept.

6. The regulators concluded that the sole awarding body must provide written guidance, to both centres and EVs, on assignment production and associated mark schemes. A generic mark scheme will be required since the assignments are unique to each centre and potentially to each candidate. Exemplar material is also appropriate in these circumstances.
7. Auditable evidence of agreeing centre produced assignments was not always available at centre visits carried out by the regulators. In some cases, assignments had been checked by EVs but not until after assessment had occurred. Following centre visits and meetings with EVs, the regulators were not persuaded that standardisation of assignments was effective. There was a lack of procedures. Centre produced assignments must be clearly signed off by the awarding body.
8. The regulators found good practice in the annual forum that EVs attend. Here, issues surrounding standardisation and other relevant matters are discussed, which is helpful.
9. The awarding body did not have a central store of centre-produced assignments for the regulators to examine. The CIOB might find it useful to have such a library for reference and standardisation purposes.
10. The centres carry out internal verification and the CIOB carries out external verification. The EV examines the centre's internal verification records. There is no clear statement on what records centres are expected to keep or for how long to allow subsequent audit and monitor provision over time. Once established, external verifiers will be in a position to check that records exist and are fit for purpose.
11. The team of 16 EVs approve and attempt to standardise the centre-produced assignments of the two or three centres they verify at each external verification visit. The regulators could not see how standardisation of assessment could be achieved given the number of centres (currently 38 active), the number of assignments, the number of assessors and the number of EVs involved. Excessive numbers of EVs add to the problems of standardisation. The ratio of centres to EVs is low and is justified only to some extent by the geographical spread of centres.
12. The EVs' workload is made heavier, however, because they are expected to inspect the quality of tuition as well as assessment. The CIOB should consider whether this forms any part of an awarding body's function.
13. Although conversations suggested that much work was being done, EVs' centre visits were not providing sufficient control of centre certification claims. Centres suggested

that some EVs never went further back in their records than the start of the current academic year, although the last visit could have taken place well before the end of the previous one. No check on past certifications was evidenced in the EV report despite the CIOB offering direct claims to its centres. The CIOB did not provide its EVs with the information they needed to carry out this check.

14. When an EV visits a centre a report is produced that includes feedback to the centre. The CIOB uses a chief EV to monitor the individual EVs' reports. The chief EV submits a report on the work of the EVs collectively to the awarding body's committees but not, as required by the regulators, on each EV. This requirement is made easier if there is a comprehensive guidance document for external verification as this will assist in ensuring consistency of work.
15. The chief EV does not accompany the EVs on centre visits, relying on the EVs' reports for information. The regulators examined a number of EVs' reports and found comments that called into question the judgements being made. The regulators concluded that it would be useful to accompany EVs from time to time in order to facilitate professional discussion of issues arising whilst still fresh in peoples' minds.
16. The CIOB informed the regulators that candidates complete the vast majority of assignments in their centres during course hours. Nevertheless, there still needs to be a certification of the authenticity of the candidate's work which is presently lacking.
17. Guidance must be provided to centres on the amount of assistance that they can give to a candidate and the number of times that a piece of work can be submitted for checking before assessment occurs.

## Accreditation conditions

6. The CIOB must ensure that its systems and procedures cover the entire process of assignment production to ensure consistency (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 56).
7. Where the CIOB allows its centres to devise assessments, it must provide them with full guidance and confirm to them in writing the adequacy of the alternative arrangements offered. This will involve the provision of mark schemes and exemplar material (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs, 58b, 58e, 60a, 60b, 60e and 60h).
8. The CIOB must have procedures that ensure, for each qualification, it (or the centre) retains sufficient evidence of candidates' work or assessment decisions to monitor

provision over time (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 13).

9. The CIOB must use the minimum number of external verifiers consistent with the geographical spread of its centres (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 61c).
10. The CIOB must specify the minimum data that centres should keep to track candidates' progress and the records and materials that centres should retain for verification purposes. In addition, the CIOB must provide its external verifiers with the information on past certifications they need to meet their responsibilities (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 60f, 61a and 61d).
11. The CIOB must check the work of each external verifier and compile a report on each of them (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 61f).
12. The CIOB must take steps to ensure that evidence provided by candidates is authentic and provide assessors with information on how the centre should confirm to the CIOB that the assessment evidence produced by candidates is authentic (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 57a and 60g).
13. The CIOB must specify to centres:
  - the extent to which candidates may be allowed to redraft work before it is assessed
  - the limits on the assistance that can be given to candidates with work that is to be assessed

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

## Observations

3. The CIOB should evaluate the benefits of keeping a library of specimen centre-produced assignments for standardisation purposes.
4. The CIOB should consider which other part of its organisation, other than the awarding body, should review the quality of tuition at centres.

5. The CIOB should evaluate the benefit to external verification of a structured accompanied visit for each EV with the chief EV and the provision of a detailed guide to external verification.

## 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 had difficulty in ascertaining what the requirements were for achieving the level 4 diploma. The cause of this confusion is referred to in the section on certification. Otherwise, information was adequate.
2. All assessment is marked by the centres who advise candidates directly of the result. The results are not graded and are issued as a pass or a fail. Despite this, some centres have indicated a grade with the results they gave to candidates. The awarding body is aware of this and has attempted to prevent it happening.
3. Once the candidate has achieved all the necessary units for the complete qualification the centre informs the CIOB. A letter of congratulation goes to the candidate from the CIOB beginning 'I have been advised by your course tutor that you have successfully completed...'. Similarly, when an EV visits a centre it is the centre that informs the EV of which candidates have been certificated since the last visit. This information must come from the awarding body if the EV visit is to be an effective control.
4. Centre visits showed that the evidence base for determining and reporting results was not effectively controlled by the CIOB.

### Accreditation conditions

14. The CIOB must ensure that its centres do not produce results other than pass/fail (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 66).
15. The CIOB must ensure that it has secure systems for confirming the results of candidates. The CIOB must provide its EVs with information on all claims for certification since their last visit and the level of sampling required. The CIOB must ensure that the EVs use this information to select the sample they inspect for accurate and consistent assessment. EVs must ensure that there are assessment and internal verification records for all certificated candidates (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 63 and 64).

## **Observations**

6. The CIOB should make clearer its requirements for achieving the level 4 diploma.
7. The CIOB should consider revising the wording on its results letter.

## Registration and certification

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 11–12 and 21–22.

### Findings

1. Candidates must be registered with a centre. They complete a registration form that is sent to the CIOB's finance department for entering in the CIOB's membership records. The department's computer allocates a membership number automatically. A further candidate number is then allocated manually by the awarding body in a hand-written record book. (Numbers are written down sequentially in a book and then the candidate name is added.). No evidence of inaccuracy was found but the system clearly depends upon high-performing staff.
2. The CIOB registers and approves centres. The forms used to apply for approval do not clearly identify the single named point of accountability for the quality assurance and management of the qualifications at the centre. In addition, the centre is not asked to agree to provide the awarding body and the regulators with access to premises, people and records, and to cooperate with the CIOB's monitoring activities. The regulators acknowledge that the awarding body usually asks for more information than is suggested by its forms but this suggests that the form is not providing the information the CIOB requires.
3. If the application form is amended to include these items (and when renewal of approval takes place) the CIOB could usefully insert a clearer requirement for buildings used for assessment to be accessible for all candidates. The CIOB also needs to clarify if the proposed centre is a partnership arrangement, with the aim of seeking documentation on the respective roles, responsibilities and accountabilities of each partner where this is the case.
4. Centres are required to demonstrate that they have competent assessors and internal verifiers. The CIOB is using a quasi national vocational qualification (NVQ) scheme but without the full application of the NVQ code to its procedures. For example, assessors and internal verifiers do not have to possess the assessor or verifier units that a NVQ centre's staff must have, but merely be working towards them. The same is true for external verifiers. The CIOB should review its competence requirements.
5. The CIOB collects data on its candidates and centres but, unusually nowadays, does not collect any indication of ethnicity. The database does not have the facility to

record this information at present. The regulators pointed the awarding body to the NVQ code for guidance on what data it might usefully collect.

6. The CIOB awards accredited qualifications outside England, Wales and Northern Ireland and the qualifications are offered to the exact specification accredited for those three countries. The CIOB could not, however, provide evidence that it informs its clients that the regulators' logos on its certificates indicate that the qualifications are accredited only for England, Wales and Northern Ireland.
7. The certificate designs presented to the regulators were deficient in some respects:
  - The logo of the Welsh Assembly Government was incorrect, still being that of ACCAC. This change occurred in 2006.
  - QCA's logo had not been changed to that of Ofqual.
  - There was a line of narrative stating that the certificate confirmed that the candidate's underpinning knowledge for the appropriate Scottish or national vocational qualification (S/NVQ) had been satisfactorily assessed. This narrative must be removed.
  - There was no unique identifier that could distinguish between multiple certificates awarded to the same candidate.
8. Units are listed on full certificates but not all of the requisite units for the full certificate are always mentioned. The CIOB refers throughout its documentation to having only two accredited qualifications when, in fact, it has three. The level 4 diploma is a separate qualification but is in many ways a continuation from the level 4 certificate, sharing the same pool of units. The specimen certificate for the level 4 diploma only shows the additional units taken after those for the level 4 certificate have been achieved.
9. The qualification accreditation number on the specimen level 4 Diploma is that of the level 3 certificate. The CIOB must correct this error.
10. The CIOB does not issue unit certificates. Instead, it issues a letter of attestation. Given the mobility of candidates in the building industry the regulators were surprised that unit certification was not the norm.
11. Centres are generally allowed to claim certificates before external verification has occurred, even in a start-up situation. The claim is by e-mail, the content of which then undergoes some manual checks before certification is authorised. The

authenticity of the e-mail is not protected by code word or any other procedure. A centre's failure to guard its terminal would allow early certification if a registered candidate saw the opportunity.

12. The systems depend upon the skills of the CIOB staff. For example, no automated ability to block certificate issue for a centre exists. This depends upon manual records which could be overlooked. Certification is said to occur only when a particular member of staff is available. Procedures are required to remove this dependency.
13. The regulators considered that the system did not have sufficient safeguards against fraudulent or mistaken claims for certification and that unacceptable delays in certification could occur in the prolonged absence of the key staff member. No such delays have occurred to date and, by its current nature, certification turnaround is fast.
14. Evidence of incorrect certification was discovered when the regulators visited centres.
15. The CIOB is content that the EV visit may occur before all assessment has taken place and, as a result, centres may claim certificates before candidate work has been verified by the EV. This practice is termed direct claims and it carries inherent risks. There is no procedure for centres or external verifiers on this subject and internal practice depends upon staff experience.
16. The regulators were concerned to find that EVs did not always pick up their verification from where they had left off at the previous visit. Any claims or work between the last visit and the end of the academic year were not necessarily checked at the next visit. This had led to a centre claiming, in error, for candidates who had commenced, but not completed, the course.
17. Replacement certificates are currently described as duplicates which would only be true for the first replacement. The word 'replacement' is safer. The CIOB is aware of the need to establish the identity of anyone claiming a replacement and the veracity of the claim, but this is sometimes handled by telephone and procedures for these checks are incomplete.
18. Most awarding bodies issue an exact replica of the original, including the original date, with the word replacement prominently shown. The CIOB's method is to show the date of the replacement's issue and annotate it clearly with the date of the original certificate as well as the word replacement, prominently shown. This variation is acceptable.

## Accreditation conditions

16. The CIOB must ensure that its centres clearly identify the single named point of accountability for the quality assurance and management of the qualifications at the centre and agree to provide the awarding body and the regulators with access to premises, people and records, and to cooperate with the CIOB's monitoring activities (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 11a and 11f).
17. The CIOB must inform its clients that the regulators' logos on the 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).
18. The CIOB must ensure that:
  - the design and content of certificates meets the regulators' requirements and that they are issued without undue delay
  - a unique identifier appears on certificates
  - safeguards against fraudulent or mistaken certification must be improved by writing a full set of procedures that link to centre and EV activities
  - full procedures for handling requests for replacement certificates should be recorded
  - the word 'replacement' is used on its 'duplicate' certificates
  - correct specimen certificates are banked with the regulators

(*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 22 and 6c).

## Observations

8. The CIOB should consider whether its system for allocating candidate numbers could be improved in order to lessen reliance on the accuracy of individual staff.
9. The CIOB should review the adequacy of its centre approval application form to ensure it provides all the information it requires to make a decision.
10. The CIOB should consider making clearer its requirements on buildings for assessment being accessible for all candidates.

11. The CIOB should clarify whether centres are operating in a partnership arrangement and follow this up with a requirement to document the roles, responsibilities and accountabilities of the partners.
12. The CIOB should consider defining the competences it requires in assessors and verifiers.
13. The CIOB should review the adequacy of its data collection on candidates.
14. The CIOB should consider providing unit certificates where requested.

## Malpractice

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 28–31.

### Findings

1. The CIOB publishes its malpractice procedures to its centres. When reviewing the procedures, the CIOB might like to strengthen its references to a graded sanctions policy since some examples of malpractice call for wider sanctions than others. In addition, the wording on sanctions for centres failing to cooperate could be usefully included.
2. The current malpractice policy meets all the regulators' requirements.

### Accreditation conditions

There are no accreditation conditions for this section.

### Observations

15. The CIOB should consider including in its malpractice policy references to a graded sanctions policy and the penalties for centres' failing to cooperate.

## Equality of opportunity, reasonable adjustments and special consideration

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 9 and 14–20.

### Findings

1. The CIOB publishes a document called *Reasonable adjustments and special considerations*. It is based on the template produced by the Federation of Awarding Bodies and has been adapted to the CIOB's needs. However, there are some statements remaining in the document that are not appropriate to the CIOB. The document needs to be edited.
2. The document includes a list of the adjustments that a centre may make without consulting the CIOB as well as those that do require permission. Centres are referred to an application form that must be submitted in such cases but the form is missing from the document.
3. Reasonable adjustments and special considerations are issued to centres in hard copy and are also available on the web. The CIOB relies upon its centres making the existence of this information known to the candidates. This could be improved by including a reference to the document in the customer service statement otherwise candidates may not know what assistance is available.
4. The CIOB advised that there had been no requests for reasonable adjustments or special consideration to date. For this reason, there has been no monitoring or evaluation of the use of reasonable adjustments and special consideration by the sole awarding body. This is a requirement.
5. The special consideration section of the policy document does not give any information on the issue of aegrotat awards.

### Accreditation conditions

19. The CIOB must put in place a procedure for monitoring and evaluating the use of reasonable adjustments and special consideration (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 20).
20. The CIOB must provide information on aegrotat awards (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 19b).

## **Observations**

16. The CIOB should ensure it edits the policy document and also includes the missing report form.
  
17. The CIOB should consider including a reference to its equality of opportunity, reasonable adjustments and special consideration policies in the customer service statement to ensure all candidates are aware of their entitlement.

## Customer service

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 32 and 33b.

### Findings

1. The CIOB publishes a Customer services charter on its website and provides centres with a hardcopy version. It relies on its centres to inform candidates of the document's existence but there was no evidence that the CIOB checked that this was being done. The charter gives information on some aspects of customer service and points of contact. It would be improved by including reference to other relevant policies of the awarding body, such as Enquiries and appeals and Reasonable adjustments and special consideration. Matters of interest to candidates should be included as best practice.
2. The customer service targets are monitored by the relevant department of the CIOB but, as mentioned in the earlier section of this report on Resources, it would be better for an awarding body representative to carry this out.
3. Feedback on the awarding body's performance is collected from candidates and centres. A summary of this feedback is collated and reviewed annually by the CIOB's committees.
4. The only omission from the Customer services charter that is covered by the regulatory criteria is a reference to fees.

### Accreditation conditions

21. The CIOB must ensure that all candidates are provided with its Customer service charter and include information in the Customer service charter on where information can be found on its fee structure (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 32).

### Observations

18. The CIOB should consider including more information relevant to candidates in its Customer service charter.
19. The CIOB should ensure that an awarding body representative monitors the performance of departments against the customer service targets that relate to the awarding body's performance.

## Enquiries and appeals

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 23–27.

### Findings

1. Assessment for all the CIOB's accredited qualifications is carried out by means of assignments that are marked internally by the tutors. This method does not usually give rise to enquiries, only appeals. The CIOB has not had any appeals against assessment or any other matters to date.
2. The enquiries and appeals policy appears on the CIOB's website and a copy is provided to centres when they are approved. Centres are depended upon to publish the procedure to candidates. There was no evidence that the CIOB checked that this was being done. Reference to the availability of an enquiries and appeals policy in the Customer service charter, and how to access it, would be a useful measure to take, once the Customer service charter is provided to all candidates (see Accreditation condition 21).
3. The policy was clear on acknowledging appeals, involving an independent element in decision making and sending written accounts of decisions to the appellant. Indications of likely timescales for dealing with appeals need to be provided at each stage and this was not clear.
4. In trying to provide definitions of circumstances where appeals could be made, the policy risked becoming confusing. It appeared to suggest that an awarding body could refuse to consider an appeal. There was also a failure to focus on the procedural nature of appeals when considering appeals against assessment, ensuring that there are adequate procedures and that they have been properly applied in reaching judgements.
5. There were a number of major omissions from the appeals process:
  - No indication of the cost, despite referring candidates to the fees sheet (which is the best practice method that avoids updating the appeals policy every time fees are adjusted). The fees sheet gave no relevant information.
  - No policy statement on refunds if an appeal were successful.
  - No truly independent review procedure. (An appeals panel where three of the four members are past presidents of the CIOB is not self-evidently

independent review.) Furthermore, the reference back to the council for ratification of the independent reviewer's decision calls into doubt the supremacy of that decision.

- No indication that successful appeals would lead the awarding body to review the same circumstances for candidates who had not appealed.
- No evidence of monitoring, evaluating and reporting on appeals on an annual basis, and no procedure for doing so.

## Accreditation conditions

22. The enquiries and appeals policy must be published to centres and candidates and include:

- a focus, in the case of appeals against assessment, on whether the CIOB used procedures that were consistent with the regulatory criteria and applied those procedures properly and fairly in arriving at judgements
- an indication of the period within which the appeals will be considered
- an indication of the cost, which must be reasonable
- an equitable system of refunds
- an explanation of how unresolved appeals may be put to independent review

*(The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004), paragraphs 23 and 25).*

23. The CIOB must take steps, where the outcome of an appeal brings into question the accuracy of other results, to protect the interests of all candidates (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 26).

24. The CIOB must have procedures in place to monitor, evaluate and report on the operation of its enquiry services and appeals arrangements annually (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 27).

## Observations

20. The CIOB should ensure that its enquiries and appeals procedure is being communicated to all its candidates. If it depends upon centres it should check in a

structured way that this is being done. It may choose methods like referencing the enquiries and appeals policy to all candidates via the customer service statement and ensuring they all receive a copy of the customer service statement.

21. The CIOB should ensure that the wording of its policy is not unintentionally restrictive by avoiding defining circumstances for appeal but listing examples instead.

## Monitoring and self-assessment

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 33a, 34–35 and 37.

### Findings

1. Discussions with the CIOB staff suggested that the reorganisation of the committee structure was likely to produce improved procedures and monitoring. Past performance, however, shows the result of not having procedures that call for the performance of the required tasks. Currently these procedures still remain to be written. The awarding body needs to write procedures that ensure it monitors its own compliance with the criteria on a regular basis.
2. As mentioned in the earlier section of this report on resources, there may need to be an allocation of resource to monitoring the awarding body's compliance with the regulatory criteria. It will be very difficult for those few staff with major responsibility for running the awarding body to become sufficiently detached to achieve this. At the same time, thought must be given to the knowledge and qualities required from an internal auditor in this area.
3. There was no evidence that the awarding body had submitted self-assessment reports to the regulators in the past but the CIOB was due to meet with the relevant section of Ofqual to agree the way forward. Consequently, the regulators have only made an observation on this matter.
4. The CIOB had effective contact with the industry for which it provided qualifications and evidenced feedback from people at all levels of seniority. It reported that its links with the CIOB's regional centres' representatives were particularly fruitful. Committee membership was encouraged even at candidate level.

### Accreditation conditions

25. The CIOB must have procedures in place to monitor its compliance with the criteria (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 33a).

### Observations

22. The CIOB should consider how it may best carry out internal audit of the regulatory criteria within the awarding body.

23. The CIOB should liaise with the Ofqual representatives on the self-assessment programme.