



Post-accreditation monitoring report

Chartered Institute of Housing

November 2009

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Introduction

Regulating external qualifications

Responsibility for regulating external qualifications lies jointly with three regulators:

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

Following the accreditation of a qualification, the regulators systematically monitor awarding organisations 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 organisation is found not to comply with relevant criteria, the regulators set conditions of accreditation. Even if an awarding organisation is compliant, the monitoring team may make observations on ways that the awarding organisation 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 organisations 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 organisations to inform decisions on the re-accreditation of qualifications, or if necessary, the withdrawal of accreditation.

Banked documents

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

A suite of documents has been identified as suitable for banking and are those considered to be the most crucial in supporting an awarding organisation's ability to operate effectively. In order 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 at the time of completion of the self-assessment return.

About this report

This is the first monitoring activity on the Chartered Institute of Housing (CIH) awarding organisation and was carried out between September and November 2009.

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

- corporate governance
- resources and expertise
- qualifications development – planning, content and design of qualifications
- application of assessment methods – 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, attendance at awarding organisation meetings and scrutiny of the awarding organisation's website. The regulators' monitoring team visited the CIH's head office to conduct interviews with staff and review documentation as well as visiting some of its approved centres.

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

About the CIH

The CIH obtained its royal charter in 1984. The awarding organisation offers qualifications in the housing sector. For more information on the CIH, visit its website at www.cih.org.

Corporate governance

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 5, 6 and 7.

Findings

1. The CIH is governed by a council of 32 members that meets four times a year. Reporting to the council are three boards, one of which is the Professional Development Board. This covers education, membership and training among other issues. The awarding organisation reports to the Professional Development Board.
2. The single named point of accountability for maintaining the quality and standards of all qualifications is the chief executive officer of the CIH. Reporting to that post is the director of professional development. The director of professional development has responsibility for both the awarding organisation and for training.
3. The CIH has a training section that provides direct training for organisations that request its help. In addition, there is a distance learning arm. The regulators' monitoring team discussed the potential for conflict of interest. The CIH stated that numbers at the in-house training centres were low. The numbers of registrations for the periods September 2007–August 2008 and September 2008–June 2009 showed that between 11 and 12 per cent of all registrations were with the CIH's in-house training centres. During this period, the distance learning courses were delivered by four further educational colleges that were accredited as 'regional centres' for this purpose. The CIH also stated that it was providing a service that was needed and would not be provided otherwise.
4. The CIH has divided the operational responsibility for the awarding organisation and the training activities between the head of education and the head of learning, respectively. Both of these positions report to the director of professional development.
5. The regulators' monitoring team examined the minutes of the CIH's committees. These contained appropriate references to the awarding organisation's activities and showed adequate supervision being maintained at appropriate levels.
6. In considering the question of whether the CIH was managing the potential for conflict of interest, the regulators' monitoring team looked at the work of the Awarding Body Independent Audit Committee. This committee consists of five members. The terms of reference specify that three of these must be totally independent. The committee reports to the Professional Development Board, but also provides an advisory role to the council. Within its terms of reference,

there is specific mention of monitoring potential conflict of interest with other CIH functions.

7. The regulators' monitoring team considered that the CIH's structure and lines of accountability were clearly defined. Without the existence of the Awarding Body Independent Audit Committee, the regulators' monitoring team would not have considered that the potential for conflict of interest was properly managed since all such functions reported to one director.
8. The regulatory criteria state that the CIH must report any change of corporate or governance structure of the awarding organisation. For the avoidance of doubt, there is an observation in this report to remind the CIH that any change or abolition of the Awarding Body Independent Audit Committee must be reported to the regulators along with an explanation of how its function is being replaced.
9. The regulators discussed the CIH's policy on setting fees and were provided with the requisite information.

Accreditation conditions

There are no accreditation conditions for this section.

Observation

1. The CIH should be aware that the Awarding Body Independent Audit Committee plays an important role in the management of potential for conflict of interest. Any change or abolition of its role or independent membership is to be reported to the regulators.

Resources and expertise

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 8 and 10.

Findings

1. The CIH explained, with appropriate charts, its organisation structure and how in some cases people divided their time between the awarding organisation and other parts of the CIH. A copy of the operational and strategic plan (2008–11) was provided together with a copy of the annual report and accounts.
2. The CIH provided the regulators' monitoring team with access to job and person descriptions. The operational and strategic plan showed that the CIH was planning to ensure that its own staff or associates had the requisite competencies. Evidence was provided on training for centre staff and for the CIH's team of moderators.
3. The regulators' monitoring team found no evidence of there being a lack of expertise or resources at the CIH.

Accreditation conditions

There are no accreditation conditions for this section.

Observations

There are no observations for this section.

Application of assessment methods: quality assurance and control of assessment

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 13, 36, 38–42 and 56–58.

Findings

1. The assessment model that the CIH uses is predominantly based on internal assessment. Four of its 10 qualifications use internal assessment only. The remaining six are also internally assessed, but contain within them one unit that is externally set and then internally marked and internally verified before being externally moderated.
2. The externally set units are all assessed by assignment. The tasks are set by a consultative group drawn from industry experts. An assessment expert may also be brought in to write up the proposals of the consultative group. The assignment brief is then returned to the awarding organisation for a check of the language used. The externally set assignments remain the same for the lifetime of the qualification and are only changed in line with changes to such things as legislation.
3. For the internally set units, the centre must create assessments by reference to the qualification specification and the learning outcomes. The centre is free to use whatever method of assessment it wishes, and additionally, may use as many or as few assessments as it wishes to examine the learning outcomes. The awarding organisation stipulates only that 60 per cent of the learning outcomes must be assessed. This assumes that centres are skilled in creating assessments.
4. The monitoring team considered that this wide variety of assessment methods makes considerable demands on the moderator whose role it is to approve and standardise the assessment at each centre. Given that each of the nine moderators has, on average, only three centres, this adds to the difficulties of standardisation across the board.
5. Allocation of centres is based on geographical location, and to some extent, the experience of the moderators themselves. Each moderator goes through an induction process and attends regular moderator forum meetings. The monitoring team observed a moderator forum meeting and found it to be a useful platform for discussing issues and standardising moderators.
6. Each time that moderators visit a centre, they complete a report that is fed back to the centre and looked at by the awarding organisation's education officer and the chief moderator who is responsible for overseeing the work of the

moderators. The chief moderator also completes a report on each moderator, which is used to identify training needs and monitor performance.

7. Moderators are contracted to work for one year to start with and then on a rolling contract of three years. They must declare any conflicts of interest in their contract. This information is kept on file by the awarding organisation and used to ensure that moderators are not sent to centres where they have any conflicts of interest.
8. At the end of the academic year, the chief moderator writes a report comparing different types of assessment across centres and identifying general trends.
9. Moderators must approve annually the assessments and corresponding mark schemes that centres have devised. Awarding organisation staff advised that, while this is done towards the start of each course, assessment may have already begun by the time moderators carry out their checks. Clearly, any gap between assessment being devised and it being checked could lead to assessment being started and then abandoned if a moderator deemed it not suitable. To safeguard the candidate from wasted effort, assessments must be approved before they are implemented.
10. The regulators' monitoring team carried out visits to centres and found that centres were highly appreciative of the CIH. They like the support provided, for example by 'tutor days' where knowledge and best practice can be shared.
11. It was clear, however, that a lack of written guidance to centres on devising assessments and mark schemes resulted in an amount of uncertainty. The larger centres were able to deal with this as they had experience and their own internal assessment systems. The smaller centres required further input from the CIH, which is currently gained through its moderator. All types of centres agreed that written guidance would be a useful aid. The awarding organisation must ensure that documented guidance is provided to centres.
12. The CIH provides sampling guidance to centres, requiring the internal verifier to look at a minimum sample of 20 per cent of assessments. It also requires that new tutors and qualifications are subject to 100 per cent internal verification. The internal verification procedure is further checked by the moderator who also looks at 20 per cent of assessments at their moderation visit. The regulators' monitoring team noted that there was no guidance given to moderators to advise them to take additional samples in cases where the initial samples show that the required standards are not being met. This must be put in place.
13. The moderation visit does not always occur at the very end of the academic year. If further assessments occur after the visit, the moderator requests

samples of these via post. Visits to centres carried out by the regulators' monitoring team confirmed that this was occurring.

14. Moderators are currently looking at the results of whole cohorts to see if marking is too harsh or too lenient. There is no system for dealing with inconsistency of marking within a cohort. The CIH must stipulate a requirement for reassessment in these cases.
15. Additionally, the regulators' monitoring team found that there is currently no check made by the awarding organisation on authenticity of candidate work. This must be implemented.
16. The qualification specification advises centres to keep candidate work for three years. The centre approval application states that records must be kept for six years. While one reference is to candidate work and the other to assessment records, the awarding organisation may wish to clarify this to centres.
17. The qualification specification states that candidates should be allowed a maximum of two redrafts of their work before it is assessed and that tutors should avoid providing excessive assistance, in order to ensure that the candidates' work is their own. This shows good practice and is compliant with regulatory criteria.
18. In 2009, for the first time, centres are being asked to send in one pass level script from the externally set units in each qualification. The CIH will keep these on file in order to monitor standards over time.
19. The CIH distance learning team writes assessments as part of its distance learning provision. There are three centres that CIH uses to provide distance learning. These centres deliver the distance learning from their own sites. These centres do not write any of the assessments used by distance learning candidates. They are solely involved in marking and internal verification of assessment.
20. In addition, the distance learning team provides some distance learning directly to some candidates without the intervention of a centre. For this reason, the awarding organisation has set up the distance learning team as a centre in its own right. As the centre sits within the training arm of the organisation, the separation of function has been preserved.
21. In order to operate as a centre, the distance learning team has contracted with a tutor and internal verifier. All distance learning centres are subject to moderation in the same way as other centres. (The potential conflicts of interest were discussed earlier in the section on governance.)

Accreditation conditions

1. The moderator must check that internally devised assessments comply with the qualification specification before the centre uses them (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 60a).
2. The CIH must produce written guidance to centres on devising assessments and associated mark schemes (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 59 and 60a).
3. The CIH must ensure that it puts in place a mechanism to ensure the authenticity of candidates' work (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 57a).
4. The moderators must be given guidance on additional sampling where the initial sample indicates that standards are not being met, and work must be reassessed where the moderator finds inconsistency of internal assessment decisions (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 61diii and 61g).

Observation

2. The CIH should clarify the requirements on the retention of candidates' work and assessment records.

Determination and reporting of results

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 63–67.

Findings

1. Unit results and overall qualification results are calculated by the centre. For the graded qualifications, the qualification specification details the formula to work out the overall grade. This is checked by the internal verifier. However, the awarding organisation only receives the overall grade and does not see the results for each unit. The CIH is over-reliant on the centre.
2. The CIH is implementing a new system from the beginning of the 2009/10 academic year whereby it will be requesting the unit results from the centres in addition to the overall grade. This will create less dependence on the centre and allow the awarding organisation to carry out its own checks.
3. For a centre to obtain candidate certification, it produces a pass list signed-off by the course leader and submits it to the CIH. There is space on the form to indicate those candidates who have left the course or who are deferring. The awarding organisation's education coordinator checks this against the database to ensure that all the candidates have been registered and that moderation has taken place. The education officer then signs-off the pass list before sending it to the customer services team.
4. The customer services team inputs the results into the database and produces the certificates. The certificates are sent to centres for distribution to candidates.
5. The awarding organisation is not fully in control of the awarding process even when the extra information on unit grades is made available. In instances where the moderator feels that the centre is marking too high or too low, they advise the CIH head office and the next cohort is marked up or down by a certain percentage. Results are not adjusted by the awarding organisation for the current moderated cohort. The reasons for this are not clear and it suggests that the CIH has certificated before the necessary checks have been made. Otherwise, this procedure is inexplicable.
6. The monitoring team observed a moderators' forum meeting where some confusion was expressed by moderators surrounding their role in the results process. Moderators felt that they were unable to change results. However, the awarding organisation stated that moderators have to tick a box on the moderation report form to indicate that they felt results were valid. The regulators' monitoring team considered that the instructions from the CIH were unclear.

7. The CIH's lack of control extended to its moderators because the awarding organisation did not provide them with details of registered candidates on which to base their sampling. Such details came to them from the centres.
8. The qualifications' specifications detail whether a qualification is pass/fail or whether grading is applied. The monitoring team noted that the level 4 Award in governance for housing specification stated that it was a graded qualification when in fact it was pass/fail. As there are no candidates undertaking the qualification, this currently has no impact, but the awarding organisation must rectify this.

Accreditation conditions

5. The CIH must create a robust system for checking the accuracy of assessments. This includes a secure method of collection of results, preceded by effective methods of moderation where assessment decisions need to be changed (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 63e, 63f, 63g and 64).
6. The CIH must ensure that it provides information to moderators on the details of registered candidates prior to a moderation visit and not delegate this responsibility to the centre (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 61d and 63a).
7. The CIH must update the specification for the level 4 Award in governance for housing to show that it is a pass/fail qualification only (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 65–67).

Observations

There are no observations for this section.

Registration and certification

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 11–12, 21–25.

Findings

1. The regulators' monitoring team was provided with the procedure and documentation used for registering centres. A visit from the allocated moderator was part of the application process to check the information provided. Issues such as a single named point of accountability for quality assurance and accessibility of buildings were all clearly covered. The only addition to the application form that would be desirable is a prompt to ask for the requisite information on the rare occasion when a centre may be a partnership arrangement between organisations.
2. Candidates register via a form submitted by their centre. The CIH inputs the information within 10 working days. A membership number is allocated by the computer automatically and advised to the learner.
3. Data on centres, candidates and qualifications is collected on the CIH's database and is readily accessible.
4. Specimen certificates were provided to the regulators' monitoring team and a small error in presentation of the national accreditation number was noticed. In addition, the certificate indicated credit values although the qualification was not accredited for the new Qualifications and Credit Framework (QCF). Upon enquiry, the regulators' monitoring team found that these specimens had been prepared specially for them and were not part of the normal production of certificates.
5. The regulators' monitoring team obtained specimen certificates of other certificate and were satisfied with their content and presentation.
6. The CIH does not inform its clients that the regulators' logos on its certificates indicate that the qualification is accredited only for England, Wales and Northern Ireland.

Accreditation condition

8. The CIH must inform its clients that the regulators' logos on the certificate indicate that the qualification is accredited only for England, Wales and Northern Ireland (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), criterion 21b).

Observations

3. The CIH should ensure that documents banked with Ofqual are those in current use and not produced for that purpose only.
4. The CIH should include on its centre application form a reference to partnership arrangements so that centres are prompted to provide the information required.

Malpractice

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 28–31.

Findings

1. The CIH publishes procedures entitled *Malpractice and misconduct policy and procedure* to its centres for dealing with malpractice. The actual malpractice procedures are compliant with the regulatory criteria except for the requirement for the awarding organisation to conduct a full investigation.
2. In the case of learner misconduct or malpractice, the onus is on the centre to investigate the allegation in compliance with the centre's own procedure. The awarding organisation offers guidance to centres on handling the case and hearing appeals against its decision. This section needs to be rephrased to make the awarding organisation's duty the same as it assumes for other allegations of malpractice.
3. At the end of the malpractice procedures is an appeals procedure. The appeals procedure is not compliant. More detailed comments on the CIH's appeals procedure appear later in this report in a separate section. The CIH must make the malpractice appeals procedure compliant with its generic appeals procedure.

Accreditation conditions

9. The CIH must conduct a full investigation of all instances of alleged or suspected malpractice (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), criterion 30).
10. The CIH must make the malpractice appeals procedure compliant with its generic appeals procedure (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), criterion 6c).

Observations

There are no observations for this section.

Equality of opportunity, reasonable adjustments and special consideration

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 9 and 14–20.

Findings

1. The CIH was aware that its equality of opportunity, reasonable adjustments and special consideration arrangements were in need of improvement. Staff responsible for this area of work told the regulators' monitoring team that the awarding organisation was moving towards adopting the Federation of Awarding Bodies' (FAB) standard procedures. These would cover most of the known shortfalls in the CIH's systems.
2. The regulators' monitoring team agreed that the FAB procedures would assist. At present, the CIH's procedures cover learning and therefore confuse what is required for assessment, which is the proper area for an awarding organisation.
3. In order to be compliant, the CIH must ensure that in setting the structure and content of its qualifications, and in its processes and arrangements for assessment and awarding, it ensures access and equality of opportunity while safeguarding the integrity of the qualifications. This brings with it the advantage of considering the needs of all potential candidates when developing qualifications, associated tasks and assessment to minimise any later need to make reasonable adjustments for candidates who have particular requirements.
4. There was a lack of clarity on what centres could do, and what needed to be referred to the awarding organisation, when making reasonable adjustments. There was no guidance to centres on what records needed to be kept in this respect.
5. The awarding organisation is not obliged to make aegrotat awards, but must state that it does not. Where it does make such awards it must specify the minimum evidence required.

Accreditation conditions

11. The CIH must, both in setting the structure and content of its qualifications and in its processes and arrangements for assessment and awarding, ensure access and equality of opportunity while safeguarding the integrity of the qualifications (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), criterion 9).

12. The CIH must consider the needs of all potential candidates when developing qualifications, associated tasks and assessment to minimise any later needs to make reasonable adjustments for candidates who have particular requirements (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), criterion 14).
13. The CIH must make clear to centres, when making reasonable adjustments, which adjustments need to be determined by the awarding organisation and which can be made without reference by the centre, together with the associated requirements for decision making and record keeping (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), criterion 17).
14. The CIH must specify the minimum evidence required to make an aegrotat award (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), criterion 19).

Observations

There are no observations for this section.

Customer service

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 32 and 33b.

Findings

1. The CIH's customer service statement is compliant with the regulatory criteria. Should it ever have assessments in Welsh or Irish, it would have to include a statement on whether it would communicate with centres in those languages or in English.
2. For information on fees, customers are referred to a separate fees sheet. The regulators' monitoring team noted the absence of information on some areas where many awarding organisations make a charge, such as replacement certificates and appeals. The regulators' monitoring team discovered that currently these services are provided free of charge. It might be useful to indicate which services are free.
3. The customer service targets were monitored and discussed in informal, unminuted meetings, but there were no written procedures for doing so and the monitoring could not therefore be evidenced.

Accreditation condition

15. The CIH must have procedures in place to monitor its performance against customer service targets (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), criterion 33b).

Observations

5. The CIH should keep in mind that if assessment occurs through the medium of Welsh or Irish, it will require an additional statement on its policy on communicating bilingually with centres.
6. The CIH should consider indicating on its fees sheet those services for which it makes no charge.

Enquiries and appeals

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 23–27.

Findings

1. The CIH procedures do not cover enquiries and only cover appeals against assessment decisions. There are therefore a number of potential situations not covered, such as centres appealing against not being approved. This needs to be addressed.
2. There is also an absence of independence in the appeals procedure at the decision-making level where all involved are either employees of the CIH or members of its committees and boards.
3. The appeals procedure must also include provision for putting unresolved appeals to independent review. The appeals procedure states that the appeals panel's decision is final.
4. Where a candidate appeals successfully, the awarding organisation must have provision for adjusting the position of other candidates who were similarly disadvantaged, but did not appeal.
5. The appeals procedure must be revised. It would be useful to make clearer that any appeals against assessment decisions must focus on whether the awarding organisation followed correct procedures rather than challenging academic judgement. It should also make clearer that the awarding organisation will tell the appellant how long it will take for the appeal to be considered.
6. The annual report to the Awarding Body Independent Audit Committee contains information on appeals, so clearly the awarding organisation is monitoring and evaluating annually on the operation of these arrangements. However, a written procedure would ensure that this is prompted annually and that it provides the information required in the regulatory criteria (that is, numbers).
7. As the CIH does not currently charge for appeals, the clauses relating to refunds are not required in the CIH enquiries and appeals procedure, but would become so if the policy of free enquiry and appeals were to change.

Accreditation conditions

16. The CIH must publish an enquiry procedure and ensure that the appeals procedure covers areas other than just appeals against assessment decisions (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), criteria 23 and 24).

17. The CIH must:
 - involve in the decision making at least one independent member who is not, and has not been at any time during the past seven years, a member of the awarding organisation's board or committees, or an employee or examiner of the awarding organisation
 - explain how unresolved appeals can be put to independent review (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), criterion 25a and 25e).
18. The CIH must, where the outcome of an appeal brings into question the accuracy of other results, take steps to protect the interests of all candidates, the integrity of the qualification and the integrity of the National Qualifications Framework (NQF) (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), criterion 26).

Observations

7. The CIH appeals procedure should be clearer that its focus in the case of appeals against assessment is on whether the awarding organisation used procedures that were consistent with the regulatory criteria and applied the procedures properly and fairly in arriving at judgements.
8. The CIH appeals procedure should indicate more clearly the period within which the appeal will be considered when acknowledging the appeal.
9. The CIH should consider creating a written procedure for ensuring that the annual monitoring, evaluating and reporting on the operation of its enquiry services and appeals arrangements occurs.
10. The CIH should ensure that its annual report on enquiries and appeals includes not just the nature of the enquiries and appeals, but their number.

Monitoring and self-assessment

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 20, 33–35 and 37.

Findings

1. The CIH had submitted self-assessment reports to the regulators and therefore there was clearly some procedure in place to monitor its compliance with the regulatory criteria. The number of non-compliances, particularly in the area of enquiries and appeals, suggests that this procedure must be improved.
2. The regulators' monitoring team considered the chief moderator's report to be an example of good practice. The awarding organisation's assessment integrity depends a great deal on the team that the chief moderator supervises and this was encouraging.
3. The CIH has procedures in place to monitor the work of its centres, but reference to suspending or withdrawing approved centre status needs to be highlighted.

Accreditation conditions

There are no accreditation conditions for this section.

Observations

11. The CIH should improve its procedures for monitoring its compliance with the criteria.
12. The CIH should make clearer the powers it has to suspend or withdraw approved centre status.

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Office of Qualifications and Examinations Regulation
Spring Place
Coventry Business Park
Herald Avenue
Coventry CV5 6UB

Telephone 0300 303 3344

Textphone 0300 303 3345

Helpline 0300 303 3346

www.ofqual.gov.uk