



Qualifications and
Curriculum Authority



Llywodraeth Cynulliad Cymru
Welsh Assembly Government



Rewarding Learning

Post-accreditation monitoring report: The Chartered Institute of Marketing

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Introduction

Regulating external qualifications

Responsibility for regulating external qualifications lies jointly with three regulators:

- the Qualifications and Curriculum Authority (QCA)
- the Department for Children, Education, Lifelong Learning and Skills (DCELLS), the body for Wales
- 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 action plan will be agreed by the regulators and its implementation monitored.

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 its awarding body recognition processes the regulators require awarding bodies to submit certain documents to QCA for the purpose of 'banking' them in an electronic file. 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 the most crucial in supporting an awarding body's ability to operate

effectively. In order 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 their self-assessment.

About this report

This report is the outcome of a monitoring activity carried out on the Chartered Institute of Marketing (CIM) awarding body by QCA on behalf of the regulators between March and May 2007. It draws together the regulators' findings on areas of corporate governance, resources and expertise, quality assurance and control of both internal and independent assessment, determination and reporting of results and registration.

This is the second post-accreditation monitoring activity on vocationally related qualifications (VRQs) offered by the CIM and is focused on the level 2 introductory certificate in marketing, the level 3 professional certificate in marketing and the level 6 professional diploma in marketing.

The monitoring activities included desk research of information already held by the regulators such as the previous monitoring report and awarding body recognition update (ABRU) submission as well as scrutiny of the CIM website. The monitoring team visited CIM's head office to conduct interviews with staff and review documentation. It visited a small selection of centres to see how the internal assessment was managed.

About the CIM

The CIM is a membership organisation that offers qualifications in marketing and related subjects to its members in the UK and overseas.

For more information on the CIM and the qualifications it offers, visit its website at www.cim.co.uk.

Summary of findings

The CIM's awarding body is well structured and head office staff are well qualified and experienced, performing their roles competently. Resources in all respects appear to be adequate. The awarding body guards against the evident potential conflicts of interest that exist within the wider organisation of the CIM. This vigilance needs to be maintained and the awarding body is considering ways of strengthening its organisation structure to maintain and improve this.

The examination process is well organised, with many aspects being of a very high standard, for example examination creation and validation. A rigorous and self-critical validation schedule is in place to ensure high standards. The introduction of focus groups to review assignments, pre-release, ensures involvement of, and feedback from, tutors in relation to assessment development. The only major gap perceived in the process was the failure to demand that access to the internet be denied to candidates sitting the multiple-choice option.

In order to comply with the regulatory criteria, the awarding body needs to report on moderators individually rather than operate an exception reporting system on those that fail.

Visits to centres revealed one or two areas where greater clarity of guidance and information gathering were required but the major requirement was to ensure that centres acknowledged the right of the awarding body and the regulators to access premises, people and relevant records.

The CIM had not kept up to date with its banking of documents with the regulatory authorities and, as a result, some of its documents needed to be reviewed and banked.

Although the regulators' team was impressed with the work of the awarding body, there were some gaps in audit trails. In particular, the inputting of data and its checking was not always being evidenced.

Overall, the regulators' monitoring team was impressed by the professionalism of the awarding body. It had created systems that were usually effective, properly administered and monitored. It was pro-active and had an accurate estimation of its own strengths and weaknesses.

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 CIM is incorporated and governed by its Royal Charter, which was granted in 1989. It is run by a board of trustees, with executive powers delegated to a professional body board (PBB) and chief executive. The head of the awarding body (the director of education) reports to the chief executive. There is also an advisory panel (the Senate) made up of leading academics in the marketing field.
2. Membership of these bodies, their terms of reference and minutes of meetings were examined. The awarding body submits reports to the bodies and it was clear that they took note of these and there was evidence of proper control being exercised. No issues arose out of this activity.
3. The CIM has several areas of operation, one of which is the awarding body for which no separate accounts are published. There is a large training centre that the CIM awarding body approves as an independent centre, and for which accommodation is provided on CIM's head office site. The CIM also provides accommodation on the same site for the Marketing and Sales Standards Setting Board (MSSSB).
4. The CIM involves itself in other activities. For example, it acts for the Communication Advertising and Marketing Education Foundation Ltd (CAM), creating and administering CAM qualifications. It also shares a unit of one of its qualifications with another recognised awarding body. It was determined that this did not constitute a partnership arrangement as each awarding body separately quality assures and awards the qualification that CIM develops.
5. The CIM has a separately constituted subsidiary, CIM Holdings Ltd, that administers and controls many of the commercial activities, including training, and another subsidiary, CIM Net Pte Ltd, incorporated in Singapore, that develops and manages education programmes in marketing and e-marketing.
6. The regulatory authorities' monitoring team explored the extent to which the awarding body was involved in these other activities and was satisfied that the CIM had taken account of the dangers and was alert to managing the potential for conflict of interest. The CIM awarding body's newly appointed director of education (who is the single named point

of accountability for the quality and standards of qualifications) stated that there were currently changes being considered to the CIM's governance arrangements to further strengthen the separation that existed between the CIM's operating divisions. Any changes will be advised to QCA in the normal way, including the banking of any revised organisation chart.

7. The CIM provided detailed organisation charts to the regulators' monitoring team and stated its fees clearly in its publications to both centres and candidates.
8. The regulators' monitoring team found that the CIM had not kept up to date with the banking of its documentation, for example specimen certificates, with the regulatory authorities. This is a condition for all recognised awarding bodies and the CIM was requested to submit its up-to-date documentation for checking and banking immediately.

Accreditation conditions

1. The CIM must ensure that all the documentation that must be banked with the regulatory authorities is kept up to date and that it institutes a procedure that will ensure that any future changes in documentation are submitted promptly, in substitution for the existing banked documents (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 6c).

Observations

There are no observations for this section.

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 CIM's education department is divided into two sections under the director of education, who is the single named point of accountability for maintaining the quality and standards of all qualifications. One section, referred to by the CIM as the awarding body, deals with the development and assessment of qualifications whilst the other, termed education networks, approves centres and supervises their ongoing quality. Both these sections, together, perform the activities of the recognised awarding body. In this report, references to the awarding body may include what the CIM calls its education networks section.
2. Staff recruitment and selection procedures exist along with evidence of structured training. The CVs of the most senior staff were examined against the job descriptions and person descriptions by the regulators' monitoring team and found to be appropriate. The CVs confirmed experience in the subject matter of the qualifications, assessment and awarding procedures amongst other skills.
3. There are approximately 16 staff working for the awarding body at head office supported by a team of approximately 150 examiners. There is also a level verifier for each qualification and a senior examiner for each module. The head office awarding body staff also service other, non-accredited qualifications. The awarding body has detailed and effective internal procedures and publishes clear guidance to its candidates and centres. The regulators' monitoring team attended an examination validation meeting that was properly conducted with procedures being applied. Senior examiners receive formal training and updating on CIM procedures twice a year.
4. There are centre advisers who visit centres at least annually. Centres are also expected to submit a self-assessment report to the awarding body (education networks section). Centres reported that the centre self-assessment report appeared to be of little value but they were satisfied with the support received from the awarding body.
5. There were no signs that the awarding body was under pressure in terms of either numbers or expertise, and the regulators' monitoring team was satisfied that the required level of expertise is available to 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: 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. The CIM uses internal assessment for its introductory certificate and has an option for both the professional certificate and professional diploma in marketing. In these cases, candidates can opt for an examination route. Most candidates resident overseas do not have the option of internal assessment, but this has been introduced on a pilot basis for a single module of the professional certificate and of the professional diploma in marketing.
2. All assessment is in English, although the CIM would provide assessments in Welsh or Irish if there were sufficient demand.
3. Internal assessment is carried out by assignments that are marked and then a sample of them second marked at the centre. The assignments are then all sent to the awarding body where a further sample will be moderated. There are published procedures and internal working procedures that set out the way in which the CIM's system works. The system is effective.
4. Assignments are sent to the CIM by its centres, together with a declaration signed by the candidate and centre that confirms the authenticity of the work. The CIM employs a number of strategies to detect plagiarism and publishes this fact widely as a deterrent.
5. The CIM receives all the assignments and keeps them for a year. It also retains, subsequently, a sample for the purposes of monitoring provision over time. The sample consists of five scripts at each grade for each unit.
6. Moderation takes place at a meeting of the moderators where they work in pairs. Numbers of moderators are related to the volume of scripts. There are internal procedures that cover the process, including detail on sampling. The senior examiner and the level verifier supervise the work and, by a system of exception reporting, draw the awarding body's attention to any weaknesses in individual moderators' work. Inadequate moderators are removed from these duties. The CIM does not, however, prepare a report on each external moderator.

7. Potential conflicts of interest are declared annually and although no central system for flagging this was evidenced, the CIM was adamant that people knew the circumstances of colleagues well enough for this not to be a problem.
8. A full assessment scheme, including mark scheme, is prepared for the assignment along with guidance for tutors that enables them to guide candidates in planning their work without divulging details of the mark scheme. A recent 'frequently asked question' on the CIM website states that tutors can give feedback on one draft of an assignment before the final version is submitted for marking. The CIM intends to incorporate this clarification into their procedures.
9. The regulators' monitoring team felt that greater use could be made of exemplar materials for the internal markers and that some questions could have been clearer in guiding the candidates to produce no more evidence than was necessary. However, the general quality of the assignment setting process was very high and the subject matter of the assignments makes it difficult to be too prescriptive in setting out a mark scheme. The CIM used (with permission) scripts from candidates to produce exemplar material from past work that could be used by candidates as guidance for future assignments.
10. The CIM moderation process includes the production of a moderation report, providing detailed feedback to centres on their internal assessments. This report includes examples of good practice and action required, if appropriate, but it may not capture all assessors where more than one is involved in marking. Centre visits by the regulators' monitoring team revealed that it was common practice for the papers selected for second marking to be chosen by the first marker and not the second marker. This is a practice that should be forbidden in the awarding body's guidance to its centres.

Accreditation conditions

2. The CIM must compile reports on each external moderator as part of its checking of their work (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 61f).

Observations

1. The CIM should keep under review the adequacy of its method for avoiding potential conflicts of interest of its moderators.
2. The CIM should ensure that the intended incorporation of clarification on the extent to which candidates can be allowed to redraft work before it is assessed is written into its procedures.

3. The CIM should ensure that where centres are using more than one assessor per unit that this is clearly flagged so that moderators will be aware of the fact and can cover all assessors.
4. The CIM should make explicit how the selection of the second marking sample should be carried out.

Application of assessment methods: 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. The CIM uses both conventional examination papers and internet-based electronic multiple-choice questions in its independent assessment. Security of the examination process is maintained by a set of procedures that both candidates and invigilators must observe. However, centre visits revealed that access to the internet is not currently blocked to those candidates sitting the multiple-choice on-line examination. Steps are in place to ensure that this is blocked in the future.
2. To monitor the work of examiners on conventional examination papers, the CIM chooses a sample of scripts, selected across grades, and these are sent to an examining team. New examiners are given special attention and if their marking is inconsistent, their scripts are re-marked by a member of the examining team. The senior examiner runs a standardisation meeting and pays particular attention to those scripts that are borderline.
3. To ensure that the question paper covers the syllabus, the senior examiner produces a grid to show coverage across the sittings and years. The CIM makes sure there is an audit trail to show that the syllabus has been covered. If awarding body staff do not feel that the coverage is adequate, papers are sent back for rewriting. The senior examiner creates the mark scheme and the scheme is checked by a validation panel. The validation panel's remit also encompasses checking pass marks and other statistical information.
4. The CIM gives considerable resources to ensuring that its setting and marking of independent assessment is of the best quality and, with the exception of the issue of access to the internet, the regulatory team was satisfied that it met the regulatory criteria in all respects.

Accreditation conditions

3. The CIM must ensure that access to the internet is blocked for candidates taking the multiple-choice exam (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 58f).

Observations

There are no observations for this section.

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 CIM examination and assignment process includes the setting of a pass mark, although the mark may be modified by the examination board when results are reviewed against past performance. Marginal candidates at the various grade boundaries have their papers examined in detail afresh. Amendments to marks are made where necessary and clearly recorded and authorised.
2. Clear information is provided on how the qualification results will be reported. New grades have been announced recently on units, although the qualifications themselves are not graded. For all its accredited qualifications the candidate can only achieve them by passing all the required units.
3. Statistical information over a period of time is gathered and provided to assist the senior examiners in their duties. Technical and professional support is clearly available to those involved in making awarding decisions.
4. The regulators' monitoring team is satisfied that the determination and reporting of results is carried out properly.

Accreditation conditions

There are no accreditation conditions for this section.

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 (2004)*, paragraphs 11–12 and 21–22.

Findings

1. The CIM approves its centres on an annual basis. Centres complete an application form detailing their resources and are visited by one of the regional education managers before approval takes place to ensure that the support required to deliver the qualification is available. Each year thereafter, the centres submit a self-assessment report and this is used to review whether renewed approval should be conferred.
2. Greater clarity could be designed into the approval application form to ensure that any disability issues around access to buildings is properly covered, although the regulators' monitoring team had no doubt that such issues were usually considered by both centres and awarding body (education networks section) staff as a matter of course.
3. The approval documentation does not identify a single named point of accountability for the quality assurance and management of the qualifications so much as a contact point, although the contact will often be fulfilling that role as well.
4. There is no mention of the agreement that a centre must give to provide access to premises, people and records for both the awarding body and the regulatory authorities and to cooperate with the awarding body's monitoring activities.
5. Data on candidates at centres, such as gender and ethnicity, are readily available and retention rates and other statistics are also at the disposal of the regulatory authorities if required.
6. However, there is no clear audit trail of results data that is input to the system. The audit trail for certificate production was examined and the CIM agreed that it required more precision in order to follow the process with certainty and guard against fraudulent or mistaken certification occurring.
7. The CIM's operations extend overseas but there is no reference to the regulatory logos on its certificates indicating that the qualification is accredited only for England, Wales and Northern Ireland. There were other omissions on certificates identified. The CIM is in the process of submitting new certificates to be banked following the appointment of the director of education and these will be checked along with other documentation before being banked under accreditation condition 1.

8. Certificate production timescales are imprecise and the awarding body confirmed this was because of the various standards within the international postal system. It intends to change this to a more precise timescale indication for the UK market, with a proviso that it cannot guarantee the same timescale abroad for reasons outside its control.

Accreditation conditions

4. The CIM must ensure that centres have undertaken to provide the awarding body and the regulatory authorities with access to premises, people and records, and to cooperate with the awarding body's monitoring activities (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 61f).
5. The CIM must ensure that there are safeguards against fraudulent or mistaken claims for certificates and write the requirements for the audit trail into its procedures (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 22c).
6. The CIM must inform its clients that the regulatory authorities' logos on its certificates 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 (2004)*, paragraph 21b).

Observations

5. The CIM should ensure that it has identified with certainty the single named point of accountability for the quality assurance and management of the qualifications at its centres.
7. The CIM should ensure that its centres make explicit the access arrangements for all candidates in respect of buildings.
8. The CIM should devise a system to evidence the checking of input of data to the certification system.
9. The CIM should provide a more certain timescale for certificate production so that the majority of its candidates know when they are likely to receive them.