



Qualifications and
Curriculum Authority



Llywodraeth Cynulliad Cymru
Welsh Assembly Government



Rewarding Learning

Post-accreditation monitoring report: The Institute of the Motor Industry's arrangements for delivering accredited vocationally related qualifications

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Introduction

Regulating external qualifications

Responsibility for regulating external qualifications lies jointly with three regulatory authorities:

- the Qualifications and Curriculum Authority (QCA), the authority for England
- the Department for Education, Lifelong Learning and Skills (DELLS), 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 regulatory authorities 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 regulatory authorities 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 regulatory authorities and its implementation monitored.

The regulatory authorities 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.

About this report

This report is the outcome of a post-accreditation monitoring activity carried out on the Institute of the Motor Industry (IMI) awarding body by QCA on behalf of the regulatory authorities in September 2006. It focuses on the systems underpinning the IMI's arrangements for delivering accredited vocational qualifications.

About the IMI

The IMI is a professional association for those working in the motoring industry and operates an awarding body offering examinations in a number of subjects relevant to the industry.

For more information on the IMI and the qualifications it offers, visit its website at www.motor.org.uk.

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 IMI is a company limited by guarantee. It is governed by a Council of Management that consists of 21 elected members who are representative of various parts of the motor industry plus the chief executive and the company secretary who is also the finance director. The IMI awarding body forms part of the IMI. There are no separate published accounts for the awarding body. The IMI provided information on their business and strategic plans that included the awarding body.
2. The IMI provided clear organisation charts for the IMI as a whole and the awarding body within this structure. The chief executive of the IMI is the head of the awarding body and the single, named point of accountability for maintaining the quality and standards of all qualifications. There is nothing in the chief executive's job description that refers to this role.
3. The Director of Learning and Skills exercises administrative control of the awarding body supported by a team that carries out all the usual activities of an awarding body. There are some common areas shared with the rest of the IMI such as marketing, finance and personnel that do not report to the Director of Learning and Skills. No potential for conflict of interest was discerned in the IMI organisation.
4. Awarding body policy is the responsibility of the awarding body Standards and Compliance committee whose decisions are subject to Council approval. The Director of Learning and Skills sits on the awarding body Standards and Compliance committee with other membership drawn from the elected councillors and executive officers of the IMI. There are other committees that help to make recommendations and carry out certain functions for the awarding body such as the National Advisory panel and the Independent Appeals and Complaints board.
5. The regulatory monitoring team examined the terms of reference and minutes of the various committees and found robust and transparent governance of the awarding body reflected in them. The committees meet regularly. Suitable reporting

procedures are observed. Examination of the material presented is clearly reflected in the minutes.

6. The IMI provided full details of its fees structure, in confidence, to the regulatory monitoring team.
7. The IMI has not kept (up to date) the documents that it was required to bank with the regulatory authorities. This is a condition of recognition as an awarding body.

Accreditation conditions

1. The IMI must bank and keep up to date those documents specified as required by the regulatory authorities (*The statutory regulation of qualifications in England, Wales and Northern Ireland, 2004, paragraph 6c*).

Observations

1. The IMI should consider adding the role of head of the awarding body to the chief executive's job description.

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 IMI employs approximately 20 people on awarding body activities. Recruitment and selection policy procedures exist and specimen job descriptions and person descriptions were provided. CVs of key staff were seen and the regulatory monitoring team was satisfied that the required level of expertise is generally available to the awarding body.
2. Only four external verifiers cover the whole country. Their work was considered to be of a high standard by most centres visited by the regulatory monitoring team. Centre staff clearly appreciated the level of support and guidance that they provided. During discussions about the type of guidance provided by the awarding body, very few centres referred to the website even where this had the detail they required. The IMI should consider making the website more accessible to centres and ensure that it indexes the basic guidance they need in order to allow the external verifiers more time on external verification.
3. The regulatory monitoring team observed that the awarding body's quality control of its centres depended to a great extent on the continued recruitment of high-quality individuals as external verifiers.
4. The question bank used for the multiple-choice examinations was examined. Although not occupationally competent, the regulatory monitoring team found enough basic errors in a small sample of items to suggest that greater resource or expertise for the design and development of the question bank is required. Candidates and assessors at centres visited, who were occupationally competent, made similar observations.
5. Further comment on the multiple-choice question bank appears in the section on independent assessment.

Accreditation conditions

There are no accreditation conditions for this section.

Observations

2. The IMI should consider improving the website's indexing so that centres are less reliant on external verifiers for basic guidance.

3. The IMI should ask experts in setting multiple-choice questions to review its question bank in order to eliminate basic errors.

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, 59-62.

Findings

1. The IMI uses internal assessment as part of its assessment strategy for most of its vocationally related qualifications (VRQs), or technical certificates as the centres know them. Centres assess candidates by observing their practical work either in the workplace or at a training centre. In addition, they use written phased tests as mini examinations throughout the course. These are set by the IMI but marked by the centres.
2. Centres are allowed to set their own phased tests although most now use those provided by the IMI. No centre visited was able to provide details of the criteria used to approve centre-devised tests where these had been used in the past. The awarding body's arrangements for ensuring the equivalence of alternative assessments devised by a centre were left to each external verifier's discretion. The regulatory monitoring team attended a meeting of the external verifiers and saw that a great deal of attention was given to standardising their approach but thought the awarding body should have some guidance set down in writing, particularly for the guidance of centres.
3. Where centres were using the IMI tests, the marking scheme was insufficiently detailed to ensure that marks were allocated using a standard method. For example, three marks could be allocated to a question where only two answers were required or 20 marks were allocated to a multiple question with at least 14 answers required and no exemplars were provided. The IMI must provide more detailed mark schemes for centres to follow.
4. The regulatory monitoring team was generally satisfied that the awarding body provided its centres with guidance on internal assessment and moderation but noticed that much of the guidance was labelled purely for national vocational qualifications (NVQs). The IMI needs to ensure that centres do not overlook this guidance when working with VRQs.

5. The awarding body had detailed procedures for monitoring the work of its external verifiers, including annual reports on their work. It used plain English in all its documents and English was the only language used, although the IMI was willing to provide assessment in other languages where there was a demand. One of its external verifiers was competent in the Welsh language.
6. The IMI has provided guidance on retaining records of assessment over time but centres were not aware of this and it is not checked specifically on the external verifier's report. As a result, when the regulatory team visited centres, examples were found of assessment records disappearing with the portfolio once certification had occurred. In some other cases, it was clear that a centre's retention of documents was driven by its own procedures rather than any knowledge of the IMI's requirements.
7. The IMI provided full guidance on sampling techniques and had no problems of consistency of external verification given that it had only four full-time external verifiers for approximately 350 centres. It was difficult to ascertain from the structure of the EV reports whether all the requirements of sampling over time had been met. For example, although the names of the assessors sampled were recorded, it was not clear from the external verifier's report what percentage of the assessors at the centre had been sampled. External verifiers tend to visit centres twice a year and it is possible that the bigger centres need more visits to achieve coverage within a reasonable period.

Accreditation conditions

2. The IMI must produce detailed mark schemes and exemplar material to help centres standardise their internal assessments (*The statutory regulation of qualifications in England, Wales and Northern Ireland, 2004, paragraph 59*).
3. The IMI must revise its external verification report to ensure it confirms that centres are keeping appropriate archives of assessment (*The statutory regulation of qualifications in England, Wales and Northern Ireland, 2004, paragraph 13*).

Observations

4. The IMI should consider producing written guidance to enable centres to devise their own assessments and external verifiers to decide on their suitability.
5. The IMI should improve its ability to confirm that external verifiers are sampling comprehensively.
6. The IMI should proofread its centre guidance to ensure that advice appropriate to its technical certificates/VRQs is not hidden under the label of NVQs.

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 IMI uses an online multiple-choice examination as its method of independent assessment for most of its VRQs. Records are kept indefinitely as the awarding body stores these electronically. Security of the examination process is maintained by a series of passwords that both candidate and invigilator must input to access the system.
2. The IMI has produced guidelines for the administration of the online examination at centres. All the centres visited by the regulatory monitoring team were aware of the awarding body's guidelines. None reported experiencing any difficulties.
3. Visits by the regulatory monitoring team to centres identified some unexpected features of the results sheet stored in candidates' portfolios. The examination title is not stated in words but carries a numerical key that verifiers and other auditors need to check to a master list of numbers. The candidate's name is not shown. Instead, a candidate number is printed in small typeface within other narrative, as if in a footnote. The regulatory monitoring team thought that these factors could result in files being mixed up, especially where centres retained control of them in their office.
4. Questions are mapped to the qualification's specification and their performance is now subject to statistical analysis although this is only just being introduced. The IMI chooses question writers by assessing their CVs against the subject being assessed. A sample of all new writers' work is checked by another occupationally competent person before they are allowed to operate.
5. The IMI keeps a record of the origination of items in the question bank and the committee that checks them. The effectiveness of the committee method of checking the items is questionable and has already been mentioned under

resources. The awarding body called up about a dozen questions from the question bank for the regulatory monitoring team to view. Two of these had grammatical errors, and one of them did not ask a question in the stem. This suggested that whatever the technical competence of the committee reviewing the questions, there was insufficient expertise to ensure the correct format of the multiple-choice questions. Although the IMI produces reports on its staff, including the external verifiers, it does not have procedures for reviewing the work of its examiners and committees that act as examiners.

6. All assessment is in the English language although the IMI will provide it in other languages if there is sufficient demand.

Accreditation conditions

4. The IMI must ensure that accountability can be tracked to individuals when checking the items in the question bank (*The statutory regulation of qualifications in England, Wales and Northern Ireland, 2004, paragraph 58d*).
5. The IMI must devise procedures for monitoring the work of examiners (*The statutory regulation of qualifications in England, Wales and Northern Ireland, 2004, paragraph 36*).

Observations

7. The IMI should review the format and content of the results sheet on its multiple-choice examination to make clearer whose work it is and the subject title of the work being examined.

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 IMI stated that pass marks for all tests are generally set at 60 per cent in agreement with the Sector Skills Council guidance. Candidates must pass all the practical assessments and phased tests that are internally assessed as well as the independently assessed multiple-choice examinations. The centres visited and candidates interviewed by the regulatory monitoring team reported uniformly that the awarding body had provided clear information on how the overall award was derived from candidate performance.
2. The team of external verifiers has been the key to ensuring that practical assessments are standardised across centres. Now that statistical information is available to the IMI their multiple-choice examinations are capable of being standardised from examination to examination too. Comment has already been made on the need to provide centres with clearer guidance on marking the phased tests.
3. The IMI reviews decisions and adjusts results where errors are identified but this is ad hoc and there are no written procedures for this. Further comment on this area appears in the section on appeals.

Accreditation conditions

There are no accreditation conditions for this section.

Observations

8. The IMI should consider developing procedures for dealing with the adjustment of results when errors are identified in assessments.

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 IMI has an internal procedures manual and this ensures that the quality of its customer service is monitored.
2. The IMI does not have a customer service statement as such. Centres and candidates were not aware of the three documents that the IMI has published that, between them, cover most of the requirements of a customer service statement set out in the statutory regulations.
3. The IMI must produce a customer service statement that updates and combines the information on fees (*IMI fees and charges*) with its *Customer Charter April 2005* information and *Who's Who at Fanshaw's*. In addition, it needs to state its policy on communicating with centres in languages other than English and provide both postal and email addresses for contact purposes.
4. Minutes of committee meetings seen by the regulatory monitoring team showed that the IMI carried out a number of surveys of its customer performance. Comment at centres visited by the regulatory monitoring team showed a high level of satisfaction with the service received.
5. The IMI should add to its internal procedures manual a requirement to keep up to date the documents banked with the regulatory authorities. It should also give thought to how such documents may be written to avoid the necessity of amendment whenever a small change is made, such as an increase in a fee.

Accreditation conditions

6. The IMI must publish a customer service statement that meets all the regulatory requirements for this document, including relevant points of contact and communication mechanisms, as well as its policy on communicating bilingually with centres (*The statutory regulation of qualifications in England, Wales and Northern Ireland*, 2004, paragraph 32).

Observations

9. The IMI should review its internal monitoring procedures once the customer service statement is in place to ensure that they monitor against the stated targets.

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. The IMI has published an enquiry and appeals procedure on its website and centres visited by the regulatory monitoring team were aware of this. These centres had ensured that the information was available to their candidates, a copy of it usually forming part of candidate portfolios' introductory documents.
2. The version of the IMI enquiry and appeals procedure banked with the regulatory authorities has not been kept up to date. Job titles referred to in the document have changed. The need for the IMI to keep its banked documents up to date has already been referred to in this report.
3. The IMI enquiry and appeals procedure does not meet the regulatory requirements in a number of respects:
 - for appeals, there may be no person independent (of the awarding body or the subject of appeal) involved in decision-making before the Independent Appeals and Complaints board
 - an acknowledgement of the appeal indicating the time period within which it will be considered and a written account of the outcome is not provided in all cases (eg centres appealing against suspension or withdrawal of approval). This may be the result of inadequate drafting as it is mentioned for a number of other eventualities
 - ambiguous drafting means that the enquiry procedure's coverage of 'other decisions affecting centres' is uncertain. It is clear for candidates, however, and the awarding body confirmed that the intention of the wording was to include decisions, other than assessment, related to centres
 - there is no certainty that appeals against assessment decisions will focus on the awarding body's procedures for arriving at judgements rather than on re-assessment
 - fees are uncertain ('The IMI will normally make no charge...') and this uncertainty is unnecessary given the IMI's verbal explanation of its fees policy to the regulatory monitoring team

- there is no explanation of how unresolved appeals will be put to independent review. The IMI considers its Independent Appeals and Complaints board to be independent but this is clearly not the case since it includes only one truly independent member (the chairman) along with the chief executive and three Council members.
4. There is nothing that indicates that when an appeal is successful anyone other than the appellant will benefit. The regulatory criteria require the awarding body to have procedures to protect the interests of all candidates affected.
 5. The IMI has no procedures for monitoring, evaluating and reporting on its enquiry services and appeals procedures although it has a log for recording receipt of enquiries and appeals. The IMI states that it has not received any appeals to date.

Accreditation conditions

7. The IMI must publish an enquiry and appeals procedure that meets all the regulatory requirements for this document, avoiding ambiguity of wording and including matters of independence, particularly independent review (*The statutory regulation of qualifications in England, Wales and Northern Ireland, 2004*, paragraph 25).
8. The IMI must include in its procedures protection of the interests of all candidates where the outcome of an appeal brings into question the accuracy of results (*The statutory regulation of qualifications in England, Wales and Northern Ireland, 2004*, paragraph 26).
9. The IMI must have procedures in place to monitor, evaluate and report annually on the operation of its enquiry services and appeals arrangements (*The statutory regulation of qualifications in England, Wales and Northern Ireland, 2004*, paragraph 27).

Observations

There are no observations for this section.