



# Awarding body monitoring report for: Chartered Quality Institute (CQI)

---

January 2009

Ofqual/09/4535



# Contents

Introduction .....	4
Regulating external qualifications .....	4
Banked documents .....	4
About this report.....	5
About the CQI .....	5
Corporate governance .....	6
Findings.....	6
Accreditation conditions .....	7
Observations.....	7
Resources and expertise .....	8
Findings.....	8
Accreditation conditions .....	8
Observations.....	8
Application of assessment methods: the quality assurance and control of internal assessment.....	9
Findings.....	9
Accreditation conditions .....	11
Observations.....	11
Application of assessment methods: the quality assurance and control of independent assessment.....	13
Findings.....	13
Accreditation conditions .....	14
Observations.....	14
Determination and reporting of results .....	15
Findings.....	15
Accreditation conditions .....	16
Observations.....	16
Registration and certification .....	17
Findings.....	17
Accreditation conditions .....	18
Observations.....	18
Monitoring and self-assessment.....	19
Findings.....	19
Accreditation conditions .....	19
Observations.....	19

## 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 Quality Institute (CQI) awarding body and was carried out between May and September 2008.

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

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

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

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

## **About the CQI**

The CQI (previously the Institute of Quality Assurance) provides both training and qualifications in various aspects of business quality in the UK and other countries.

For more information on the CQI visit its website at [www.thecqi.org](http://www.thecqi.org).

## Corporate governance

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

### Findings

1. The CQI was granted its royal charter in 2006 and, on 1 January 2007, took over the entire undertaking of the Institute of Quality Assurance, a charity limited by guarantee. The regulators were properly informed of this change of name by the awarding body.
2. The CQI is governed by a board of trustees and control of the awarding body is exercised through a qualifications board. In addition, there is an educational advisory group. Discussions with the staff of the awarding body revealed that there were a number of other committees and advisory boards that did not appear on the current banked organisation chart. It would be helpful if those that interact with the awarding body function are shown.
3. The interim chief executive is the single named point of accountability for maintaining the quality and standards of all accredited qualifications.
4. The regulators reviewed the awarding body's organisation chart and could see that the awarding body's staff line-management started with the executive director, operations through an education manager to two education officers. This small team was due to change, since the education manager was leaving and not being replaced. Instead, day to day responsibility for the awarding body was being passed to the operations manager who is responsible for the CQI's membership, certification and education teams. The operations manager will continue to report to the executive director, operations.
5. The regulators examined the minutes of the educational advisory group and the qualifications board. The regulators were satisfied with the existing and planned corporate governance arrangements for the awarding body since they met the regulatory criteria.
6. The regulators were told that a new chief executive was due to be appointed and new terms of reference for the committees were being drafted. The new appointment must be advised to, and the revised terms of reference banked with, the regulators. A new organisation chart for the awarding body must also be banked.

7. The CQI has a training arm but does not run courses related to the accredited qualifications. It also has a publications section but no evidence was seen of any failure to manage potential conflicts of interest. Indeed, the minutes of the educational advisory group showed that the awarding body was well aware of its responsibilities to manage potential for conflict of interest.
8. The regulators examined all the existing banked documents and noted that some were out of date and did not meet the current regulatory criteria.
9. The CQI provided the regulators, in confidence, with information on their policy and arrangements for setting fees. The regulators were satisfied with the information provided.

### **Accreditation conditions**

1. The CQI must keep its banked documents up to date and in line with the current regulatory criteria (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 6c).

### **Observations**

1. The CQI should ensure that it shows a fuller committee structure on its organisation chart that makes clearer who influences the awarding body's work.

## 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 CQI stated that it had recognised that the awarding body was in a somewhat isolated position within the organisation. This is why the CQI intended taking day to day management of the awarding body into the operations division at a higher level during the course of 2008. The extra staff resources available there would allow better cover for absences and continuity when people moved on. The higher level of authority would ensure that awarding body interests are defended.
2. The awarding body shared resources with the CQI generally (e.g. information technology, finance and personnel). No evidence of lack of resource in these areas was found.
3. The CQI has ten principal examiners and a chief examiner for its two accredited qualifications. These are contracted staff, not employees. Some of the examiners have been with the awarding body for several years but their personnel files are commendably complete. The person description for the post of chief examiner highlights the requirement that the person must not be involved with the delivery of CQI qualifications, which the regulators considered good practice.
4. The regulators examined the resources that the awarding body has at its disposal and, in particular, the procedures in place for acquiring and retaining appropriate skills. The regulators looked at a selection of staff CVs and were satisfied that the CQI has, or has access to, all the skills it needs to perform the role of an awarding body. The awarding body relied on the CQI's standard personnel procedures for recruitment and induction.
5. The regulators were satisfied that there is no evidence of pressure due to lack of resources or expertise.

### Accreditation conditions

There are no accreditation conditions for this section.

### Observations

2. The CQI should ensure that it keeps the awarding body sufficiently staffed.



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

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

### Findings

1. The CQI offers two accredited qualifications: a level 3 certificate in quality assurance and a level 5 diploma in quality (assurance and management).
2. The level 3 certificate consists of three mandatory units. Units 1 and 2 are assessed by assignments that are marked internally at the candidates' centres. The scripts are then forwarded to the CQI for moderation. Unit 3 is assessed by external examination.
3. The level 5 diploma consists of five mandatory units and one further unit. Four of the mandatory units and the further unit are each assessed by two methods: an assignment, which is marked internally at the candidates' centres and an examination, which is marked by the awarding body. The remaining mandatory unit is assessed purely by means of an assignment (termed a project) that is marked by the awarding body. Projects have to be submitted to the unit's principal examiner for approval but the CQI provides guidance on choosing a project and indicative content.
4. The awarding body sets the assignments but has recently (since December 2007) changed their nature from a specific topic with a detailed mark scheme to a more generic assignment that allows the candidate to adapt it to their particular work-place. The mark scheme is, therefore, generic.
5. Centre tutors mark the internally assessed assignments. The CQI has on file a CV for each tutor. The CQI offers training for tutors and, although the workshops are not compulsory, they are generally well attended. Exemplar material would help centres standardise their assessment decisions.
6. All internally marked assignments are recorded on a mark sheet and sent to the awarding body for moderation of the marking. The marks awarded by tutors are provisional and subject to amendment upon moderation by the CQI. The centre handbook advises centres not to reveal these marks to candidates but the decision on whether to do so is left to the centre.
7. Full details of sampling and moderation procedures are recorded in examiner's instructions. The CQI's examinations manager selects a sample of assignments and

sends these to the moderators. (The project, which is currently marked twice by the awarding body, will be dealt with in a similar way in future.) The moderators provide feedback to the centres on their assessments, especially when they change the marks awarded, up or down. Such decisions are checked by the chief examiner before implementation. A report on the work of each moderator is produced.

8. Where marks are inconsistent the moderator cannot adjust up or down. The scripts are then sent back to the centre for re-marking but with no requirement for a different assessor. It would be good practice for the assignments to be sent to another marker. The Code of practice GCSE, GCE and AEA, April 2008, page 23, even though concerned with different arrangements for marking, gives useful guidance on dealing with inconsistency. It states 'examiners who do not display sufficient care, accuracy or consistency...must not be allowed to continue marking'.
9. Assignments and examination scripts are kept for 12 months by the awarding body after which they are destroyed. In its own action plan, the CQI has identified the need for better procedures to ensure consistency of standards across time. An archive of candidate performance at various mark-breaks is only just being established.
10. The CQI is not keeping a record of which assignments are sampled after the marks have been finalised. This means that the only way that the awarding body can provide the information on which scripts have been moderated is to manually check the mark sheet of each assignment. Although the regulators were satisfied with the CQI's policy on sampling, it was not practical in the time available to check that it was being implemented. The CQI should ensure that the audit trail is preserved.
11. The centre handbook advises that tutors may give guidance to candidates to help them complete their assignments. There is no clear indication of the limits to any such assistance nor the extent to which candidates may be allowed to redraft work before it is assessed.
12. The CQI Education Centre guidelines state that 'CQI will not accept any assignment that has a mark lower than 30%'. This guidance is ambiguous and may affect examination entry. One interpretation is that centres have a duty to work with students to bring the mark up to this figure before moderation is requested. Another interpretation is that a candidate will be prevented from sitting the examination even though the assignment mark is only provisional at this stage. The awarding body should clarify this statement.

13. The awarding body has recently decided that none of its principal examiners may deliver its qualifications in centres. Whilst this information appears in the chief examiner's job description, it does not appear in those of the principal examiners, although the principal examiners are aware of this ruling and it is in their contract of employment. The CQI should ensure that the job description is updated.
14. All candidates have to register with a centre and authenticity of work is confirmed by their signing the assignment cover sheet, which is counter-signed by their tutor/assessor.
15. The CQI does not visit its centres on a regular basis but as internal assessment is submitted in its entirety to the awarding body for moderation, this is more particularly a concern for examinations. (See subsequent section on independent assessment.)
16. Assessment is in English but the awarding body offers assessment in Welsh or Irish if notice is given.

## Accreditation conditions

2. The CQI must provide information to internal assessors on the extent to which candidates are allowed to redraft their work before it is assessed (including clarifying the 30% rule) and the limits on the assistance that can be given to candidates with such work (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 60c and 60d).

## Observations

3. The CQI should review its mark schemes' clarity and the need to provide exemplar materials to assist internal assessors.
4. The CQI should consider whether the centre's divulging provisional marks is an action likely to cause confusion to candidates.
5. Where inconsistencies are found in the marking of work by a particular centre, the CQI should ensure the work is reassessed by someone other than the original marker.
6. The CQI should ensure that its procedures for archiving continue to be reviewed and improved.
7. The CQI should improve its moderation records in order to facilitate an audit trail.

8. The principal examiners' job descriptions should be updated to include the requirement that they must not be involved in the delivery of CQI qualifications.

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

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

### Findings

1. Unit 3 of the level 3 certificate and all units of the level 5 certificate have independent assessment either from a written examination or an assignment (project) marked by the awarding body. Principal examiners are appointed for each subject area and they mark the relevant papers. The chief examiner oversees the process.
2. Examinations, assignments and marking schemes are produced by the principal examiners and then signed off by the chief examiner. The CQI makes use of clear flowcharts to track the process, which includes proof-reading and printing in-house.
3. The regulators accepted that the examiners compiling the assessments ensured full syllabus coverage and that this was checked by the chief examiner. However, no record of this was kept that could be audited.
4. The CQI has invigilation regulations for its examinations that include guidance on identifying candidates, which the regulators considered to be good practice. However, it does not carry out centre visits to check that these are being correctly followed. Unusually, candidates are allowed to retain their mobile telephones on their person as long as they are switched off. Best practice would be to surrender them as they enter the examination room.
5. There is no guidance on the secure storage of examination papers ahead of the examination. Equally, there is no guidance on the minimum requirements for an examination centre's suitability.
6. The examination papers are distributed to the principal markers by the awarding body. Initial samples of marked papers are taken from the markers and moderated before further marking is allowed to continue. This ensures that the mark schemes are being interpreted correctly and consistently. Further samples are taken at a later stage. The awarding body is open to amending the mark scheme should unexpected but correct answers arise.

7. The assignment, termed a project, for the level 5 qualification is in a state of flux. It used to be marked by the tutors like other assignments but this changed to being marked by the principal examiner and second marked by the chief examiner. This is an interim stage and in future only a sample of the principal marker's work will be looked at by the chief examiner in line with other assignments.
8. The CQI uses one principal examiner per unit of assessment and the regulators do not think these numbers excessive and are consistent with high quality work. Examiners produce detailed reports on each examination session (currently twice per year).
9. The regulators looked at specimen mark schemes and considered that those for examination papers could have had a more detailed break-down of marks.

### **Accreditation conditions**

3. The CQI must ensure that assessment requirements are evidenced as having been mapped against the qualification specification (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 58d).
4. The CQI must specify arrangements to maintain security of its examination papers (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 58f).

### **Observations**

9. The CQI should consider visiting its centres to check the examination guidelines are being followed, including the suitability of venues. This visit can also be used to obtain feedback from centres on any other issues.
10. The CQI should consider how mobile phone usage should be controlled during an examination.
11. The CQI should review its mark schemes and ensure they are as detailed as possible.

## 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. As stated in the earlier section of this report on internal assessment, the CQI offers two accredited qualifications: a level 3 certificate in quality assurance and a level 5 diploma in quality (assurance and management).
2. The level 3 certificate consists of three mandatory units. According to the syllabus publication provided to the regulators, units and the qualification itself are graded. This statement is incorrect. Only the units are graded (fail/pass/merit/distinction).
3. The level 5 diploma consists of five mandatory units and one further unit. Four of the mandatory units and the further unit required to complete the qualification are each assessed by two methods. 40% of the mark for each unit comes from an internally assessed assignment, and 60% comes from an examination that is marked by the awarding body. The remaining mandatory unit is assessed purely by means of an assignment (termed a project) that is marked by the awarding body. Each unit is graded but not the qualification itself.
4. Grade boundaries are set during the development of the qualification by the examiners involved in their development, and are fixed.
5. Assignment marks are input to the database directly from the assignment cover sheet and are only amended through the moderation process, if required. There is no written procedure for checking input to the database although staff interviewed confirmed that this was done in practice.
6. Once raw marks have been completely input to the system, the result is automatically computed and the results go to an awarding meeting attended by all relevant subject examiners and the chief examiner. Statistical analyses are produced for this meeting by the chief examiner to inform discussion and decision making. Issues considered include comparisons with previous sittings, and different examiners. Minutes of awarding committee meetings were examined by the regulators and found to be satisfactory.
7. Results are issued to candidates on result slips within one week of their confirmation at the awards meeting and a copy of the results goes to the centres.

## **Accreditation conditions**

5. The CQI must correct the statement in its syllabus that states that the level 3 qualification is graded overall (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 65a).

## **Observations**

12. The CQI should ensure that the requirement to check input to the database is set out in writing in its procedures and can be proven with an audit trail.



## Registration and certification

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 11–12, 21–23 and 25.

### Findings

1. The CQI gathers all the requisite information such as the single named point of accountability for the quality assurance and management of its qualifications during the application for centre approval process. Centres complete a self-assessment and sign a declaration covering
  - resources
  - accessibility of buildings for candidates
  - rights of the CQI and its regulators to have access to premises, people and records
2. Upon registration (preliminary approval), the CQI calls its centres 'registered education centres' until a centre visit has occurred when they are called 'approved education centres'. Once registered, the centres receive a centre handbook and access to a secure website. Re-registration occurs every three years, with centre details having been updated annually in the meantime.
3. Examination venues are not inspected and the CQI should exercise a duty of care to its candidates to set the required standards and ensure their observance.
4. Candidates register with the CQI via its centres. The CQI collects data on its centres and candidates and is capable of retrieving this from its database should the regulators request it.
5. The CQI does not inform its clients that the regulators' logos on the certificates issued indicate that the qualification is accredited only for England, Wales and Northern Ireland.
6. The specimen certificates provided to the regulators do not meet the requirements set out in appendix five of the regulatory criteria for unit and full certificate design. The CQI must ensure that all certificates comply.
7. There are inadequate procedural safeguards for issuing certificates, including replacements. Results letters issued to candidates ahead of certification do not show the correct accredited qualification title.

## Accreditation conditions

6. The CQI must inform its clients that the regulators' logos on certificates 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).
7. The CQI must ensure that the design of certificates meets the requirements of the regulators and that all certificates, including replacements, must have sufficient safeguards against issue by mistake or fraud (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 22).

## Observations

13. The CQI should set standards for its examination venues and inspect them from time to time.
14. The CQI should show the correct accredited qualification title on any results slips issued to candidates.

## Monitoring and self-assessment

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 20, 27, 33a, 33b, 34–35 and 37.

### Findings

1. The CQI operates an internal audit system across the entire organisation and an action plan is produced. However, the regulatory criteria are only looked at as a small part of this audit, with the result that the issues contained in this report were not all identified. The operations manager advised that a further audit, focused on the awarding body, was planned for later in the year. The CQI is cooperating with the regulators in its self-assessment project.
2. Internal customer service levels are closely monitored and reported weekly to the operations manager. Evidence of this was provided. The CQI e-mails its centres once a year for external feedback and encourages feedback from its candidates. However, the lack of regular visits from the awarding body puts some pressure on it to ensure first-class communications, particularly when changes of procedures occur.
3. The CQI clearly monitors the work of its centres but needs to link its findings to a published sanctions policy, where necessary.
4. The CQI monitors requests for reasonable adjustments or special consideration and has identified in its internal audit action plan the need to evaluate these.
5. There are procedures for enquiries and appeals but the activities need to be reported on annually after evaluating them. At present only a log is kept. The CQI must decide how, and to which committee or person, it will monitor, evaluate and report on enquiries and appeals in future.

### Accreditation conditions

8. The CQI must have procedures in place for monitoring, evaluating and reporting annually on the operation of its enquiry services and appeals arrangements (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 27).

### Observations

15. The CQI should ensure that the CQI's internal audit covers the regulatory criteria adequately.

16. The CQI should consider scheduling regular visits to its centres for feedback purposes. Linking such visits with its audit responsibilities, it should also link its findings to a structured sanctions policy.

17. The CQI should follow through its internal audit finding on the need to evaluate its arrangements for reasonable adjustments and special consideration.