

# CMI Retention of Records Policy for CMI Centres and Training Providers

AB/POL/0010 • September 2024 • V5

## History

### History

Date	Amendments made
September 2024	<ul style="list-style-type: none"> <li>Complete revision of the policy.</li> </ul>
July 2019	<ul style="list-style-type: none"> <li>Complete revision of the policy.</li> <li>Insertion of 'History' and 'Distribution' section</li> </ul>

## Distribution

### Distribution List

- All Quality Managers
- All CMI Markers & Moderators
- Partner Relationship Managers
- Customer Service Team
- Partner Engagement Managers
- EPA Operational Team
- Awarding Body Support Team
- CMI Centres

This policy will be published on the [CMI website](#).

## Document Purpose

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This policy outlines the Chartered Management Institute (CMI's) guidelines and procedures for retaining CMI Centre records, assessment materials and Learners' work.

## Scope

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This policy applies to all CMI Centres and Training Providers who use CMI as their End Point Assessment Organisation.

# Introduction

## Document Introduction

As part of the regulators' requirements ([CCEA Regulation](#), [Ofqual](#) and [Qualifications Wales](#)), there is a requirement under Condition C2 and [SQA Accreditation Regulatory Principles](#), Principle 10; for all regulated awarding organisations/bodies to ensure that our Centres and Training Providers take all reasonable steps to comply with requests for information or documents made by the awarding organisation or regulators as soon as practicable. This document fulfils that requirement.

**Definition** - Records are defined as representations in permanent form. This may include documents and other forms of information. For issues relating to Learner details, the CMI [Data Privacy Policy](#) prevails.

# Regulatory Requirements

## Regulatory Requirements

### Regulatory Requirements and Definitions

This policy meets the regulatory requirements set out by the [CCEA Regulation/Ofqual](#)- General Conditions of Recognition, [Qualifications Wales](#) - Standard Conditions of Recognition -

### Condition C2 - Arrangement with Centres

C2.3 That agreement must in particular include provisions which –

(b) require the Centre to take all reasonable steps to comply with requests for information or documents made by the awarding organisation or Ofqual as soon as practicable,

This Policy also meets the requirements of the [SQA Accreditation Regulatory Principles](#):

### SQA Accreditation Regulatory Principle 10.

The awarding body must ensure that its systems and processes for the identification, design, development, implementation and review of qualifications and assessments are fit for purpose

The awarding body is responsible for demonstrating:

- the need or demand for a qualification
- the methodology by which the qualification is assessed
- how the qualification is quality assured
- how consistently the assessment performs over time

In addition to the above, and more specifically, where the awarding body has designed its own qualifications and assessments, the awarding body is responsible for demonstrating:

- who the qualification or assessment is designed for
- the intended purpose and use of the qualification
- what the assessment needs to measure
- how the assessment will be measured
- how well the assessment measures what it is intended to measure
- evidence of the assessment's validity, reliability and comparability
- that the assessment does not measure unintended attributes
- that the assessment is inclusive, free from bias and discrimination
- the expertise of staff involved in qualification and assessment design

Where an awarding body submits its qualifications for SCQF credit rating approval, it must demonstrate that it has followed SQA Accreditation's SCQF credit rating methodology and approval process. The awarding body must have a process detailing its role in organising, managing and submitting its proposed SCQF credit rating recommendations to SQA Accreditation.

## Retention of Records Requirement

### Retention of Records Requirements

We require CMI Centres to maintain records, programme and Learner details, relating to each CMI qualification, for a minimum period of three years and to make them available to CMI for the purposes of resolving any issues arising from external quality assurance or appeals. In addition, such records must be made available to the Regulatory Authorities upon request.

### Retaining Learners' Work

CMI requires Centres to retain Learners' generated work, for each qualification, until CMI has certificated the Learner. CMI advises Centres that the Learners' work/portfolio should be retained intact for six months after certification, in case it is required for auditing purposes. However, the Learner's work/portfolio remains the property of the Learner.

### Learner Records

Learner records that the Centre must retain for a minimum of three years or in line with GDPR requirements include:

- Enrolment records to include:
  - Learner name
  - Date of birth
  - ULN (if established)
  - Contact address
  - Allocated Assessor(s) name
  - Allocated IQA(s) name
  - Date of registration
  - CMI Learner enrolment (P) number
  - Any particular assessment requirements
  - Enrolled CMI qualification title and level
  - Progress records, including unit accreditation and qualification completion dates
  - Records of certificates claimed including unit/credit certificates
  - Details of who claimed the certificate and when

### Centre Assessment Records

Assessment records that the Centre must retain for a minimum of three years include:

- CMI assignment brief used by the Learners
- Learners' records that include:
  - Evidence of who assessed what unit, assessment criteria and when (date)
  - Evidence of the assessment decision with feedback
- The location of any supporting evidence (for example. portfolios)
- Centre IQA sampling/feedback records
- Records of either CMI Moderation or CMI Marking Service

Assessors and Learners must provide a written declaration or using an electronic 'Click to Declare', that Learner evidence is authentic and that the assessment took place under the conditions or context set out in the qualification and/or assessment documentation. Failure to do this constitutes grounds for the sanction or withdrawal of approval for the qualification/assessment in question.

## Centre Quality Assurance Records

Quality assurance records that the Centre must retain for a minimum of three years include

- IQA records/feedback indicating who quality assured what, when and feedback
- IQA sampling strategy
- IQA sampling plan to include details of the sample selected and its rationale
- Records of IQA standardisation meetings
- Delivery and Assessor support meetings
- Records of either CMI Moderation or CMI Marking Service

Centres must provide appropriate training and development opportunities to enable Centre staff to have an understanding of the standards and other assessment requirements that apply. CMI will monitor a CMI Centre's compliance with this requirement and Centres must keep relevant records of such activity, (for example, staff development records) as evidence.

## Evidence of Quality Management of Assessment Records

As part of the quality assurance checks undertaken by the CMI Quality Managers, there is a requirement for Centres to confirm and demonstrate that they have in place the correct management of assessment records. The Quality Manager will sample learning tracking records where possible during a face-to-face quality assurance visit. Where a virtual visit is undertaken, then the Quality Manager will request access to the Learner tracking systems virtually. This may involve the sampling of the Centre's MIS system or other suitable systems. Alternatively, if the Centre does not use electronic portfolios, then the CMI Quality Manager may request that the Centre upload the assessment evidence to the Moderation system for further sampling.

## Failure to Retain Sufficient Records

If a Centre fails to comply with the requirements for maintaining auditable records and cannot substantiate claims made on behalf of Learners, CMI will take appropriate measures to safeguard the consistency and integrity of the award. CMI will inform the Regulatory Authorities of such cases and initiate agreed investigative procedures.

## Data Protection

### Data Protection Requirements

CMI Centres are required to maintain all Learner records and details of achievement in an accurate, timely and secure manner in line with the requirements of CMI and Data Protection Legislation and make these records available for external quality assurance and auditing purposes, as required. CMI's [Data Privacy Policy](#) can be found on our website.

## Monitoring and Review

### Monitoring and Review

This policy will be reviewed annually to ensure the appropriateness and approach are fit for purpose.