# **CMIQUALITY** ASSURANCE HANDBOOK



# **PURPOSE & SCOPE**

#### Purpose & Scope

Where assessments are marked by Centres, CMI needs to ensure that standards are being applied accurately, consistently and fairly in accordance with the qualification requirements. At CMI we undertake quality assurance monitoring activities including external quality assurance and moderation to ensure that assessment judgements are valid and reliable and that Learners are not advantaged or disadvantaged.

This document sets out the minimum common quality assurance requirements for our regulated qualifications and also where Centre assessed judgements are made. This quality assurance handbook applies to both CMI Fully Approved Centres and CMI Registered Centres. Specific guidance will also be included in the relevant qualification syllabus and/ or assessment documentation.

This document sets out CMI's expectations for Centre's internal quality assurance processes to ensure that assessment standards are met and upheld. It also contains details on how CMI ensures quality through external quality assurance methods and moderation.

This document should be used in conjunction with the other documents and policies provided by CMI, as well as any other relevant qualification and assessment documentation.

Every effort has been made to ensure that the information contained within this handbook is true and correct at the time of publication. However, CMI products and services are subject to continuous development and improvement and the right is reserved to change products and services from time to time. CMI cannot accept responsibility for any loss or damage arising from the use of the information in this handbook.

CMI Quality Assurance Handbook		
Applies to	CMI Centres, CMI Learners, CMI Staff and Associated Third Parties	
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# **Version Control**

This is version 2 of the Chartered Management Institute (CMI) Quality Assurance Handbook. It is each Centre's responsibility to ensure that all Staff involved in the provision of CMI qualifications and/or assessments familiarise themselves with this version of the document.

This document is subject to revision and is maintained electronically. Electronic copies are version controlled. Printed copies are not subject to this control.

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# INTRODUCTION

#### Section 1 - Introduction

#### 1.1 Introduction to the CMI Quality Assurance Handbook

This document provides guidance for CMI Centres delivering CMI qualifications and/or carrying out assessments. It covers the requirements and provides guidance and best practice in delivery, assessment and quality assurance for Centres.

#### 1.2 Purpose and Scope

This is all in aid of one simple goal: to increase the number and standard of professionally qualified Managers.

#### 1.3 CMI and its Role as an Awarding Body

CMI is a specialist Awarding Body that offers a wide range of qualifications in Management and Leadership, Coaching and Mentoring, and Professional Consulting. CMI has four regulators:

- Ofqual (England)
- Qualifications Wales (Wales)
- Scottish Qualification Authority Accreditation (SQAA) (Scotland)
- CCEA Regulation (Northern Ireland)

CMI is regulated as an organisation as a whole and is monitored in areas such as governance, safeguards on change of control, conflicts of interest, availability of adequate resources and arrangements, identification and management of risks, management of incidents, malpractice and maladministration and its arrangements with its Centres. Centres need to provide CMI and the regulatory authorities access to premises, people and records as required, and fully cooperate with their monitoring activities, including (but not limited to) providing access to any premises used (including Satellite Centres).

CMI is also regulated in how it designs and develops its portfolio of qualifications. It develops and awards a wide range of qualifications; these qualifications are delivered and assessed via approximately 600+ of our Centres. For our fully Approved CMI Centres, all delivery and assessment are devolved to our Centres and for CMI Registered Centres, delivery is undertaken by the Centre and assessment and quality assurance are undertaken by CMI. CMI has a quality assurance model which monitors and maintains our standards for the delivery and assessment of CMI qualifications.

# **CMI QUALITY STANDARDS & ASSURANCE**

### Section 2 - CMI Quality Standards and Assurance

#### 2.1 Quality Assurance Activities

All of the CMI quality assurance policies and procedures can be found on the website at: <u>https://www.managers.org.uk/education-providers/policies-and-procedures</u>

There are a number of different types of CMI Centre approval. Only **Approved and Registered Centres** are entitled to offer regulated CMI qualifications. **Recognised Centre** status shows that a Centre's programmes are endorsed by CMI but the Centre is unable to offer regulated CMI qualifications without being subject to further quality assurance.

In order that CMI can safeguard the awarding of its qualifications, there is continual quality assurance of CMI Approved and Registered Centres. CMI has planned, systematic activities that ensure compliance with quality requirements. The systematic measurement, comparison of CMI standards, and monitoring of processes and feedback from Centres all ensure the prevention of risk against the awarding of CMI qualifications.

CMI measures the quality assurance of its Centres through the following activities:

- Centre approval applications
- Centre visits (announced and unannounced)
- Monitoring exercises
- CMI desktop audits
- Review of online documentation on the CMI Hub
- Centre Staff approval
- Additional qualification approval
- Moderation
- CMI marking
- Financial controls
- Standardisation of the assessment and moderation teams

There are a number of full-time Quality Managers/Auditors responsible for the quality assurance of CMI Centres.

#### 2.2 Centre Approval

The CMI quality assurance process for its qualifications starts when an organisation wishes to become an Approved or Registered Centre.

#### 2.3 Pre-approval Enquiry and Support

The first step in the process for any prospective CMI Centre is to complete the new Centre enquiry form and send it to CMI's dedicated Approval Teams. The form will be reviewed and the approval process and services required will be discussed with the prospective Centre. At any stage of the approval process, CMI has the right to no longer progress the application. Prospective CMI Centres will be given a reason why the application can no longer be progressed, there is no right of appeal at any stage of the Centre application process.

As part of this Pre-approval enquiry, financial credit checks and Companies House checks are undertaken.

International CMI Centres are required in addition to also present an In-country Trading Licence and 2 testimonials from either a public body organisation and/or a large private organisation.

#### 2.4 Centre Approval Application Process

Prospective CMI Centres that progress to the Centre approval application stage will be required to complete the Centre approval process on the online CMI Hub system. They will be required to provide evidence/demonstrate the following, by completing a narrative answer to the questions and, where required, provide evidence:

- Centre details
- Centre management and systems
- Qualifications required to be added to the Centre's portfolio
- Centre Staff, staffing resources and monitoring
- Equality, diversity, health and safety, data protection, conflict of interest policies and procedures
- Learner support
- Assessment and quality assurance processes
- Delivery and resources
- Centre policies

Higher Education Centres outside of the UK wishing to become a CMI Approved Centre will be required to complete an application form using the document in the appendix of the Partner Guide to Dual Accreditation - Worldwide. This should be completed and submitted to <a href="mailto:approvals@managers.org.uk">approvals@managers.org.uk</a>

As part of CMI Centre approval and due diligence process, the Quality Manager may also undertake the following checks:

- Check the organisations website
- Undertake a general search on the internet in regards to the organisation
- Review any information from reports published from the Office for Students or Ofsted
- Review any information provided from the regulator or another awarding organisations under regularity condition A8.7

At this stage of the Centre application process the CMI Approvals Quality Auditor will engage with the Centre and ensure that the Approved and Registered Centre Regulatory Agreement is signed before processing the application to the next stage/review.

#### Centres offering a Distance Learning Approach

In addition, Centres offering a distance learning approach to the delivery, assessment and internal quality assurance of CMI qualification will be required to demonstrate in their application:

Centres must be able to:

- Describe how the online or remote models of delivery, assessment and quality assurance will operate
- Explain any rules and regulations
- Outline any terms and conditions that their Learners are required to consent to

Centres must specify the following:

- Any minimum hardware or software specifications for online assessments
- Acceptable electronic file formats for recording assessment evidence
- Fee and refund processes
- Any other information that Learners or users of technologies should be aware of

For online assessment (Approved CMI Centres only), the following must be clear:

- How a Learner books an assessment
- How a Learner pays fees or gets a refund
- What is expected of a Learner prior to, during and after assessment
- How and when a Learner receives their results

• Who Learners can complain to should they need to

#### 2.5 Approved and Registered Centre Regulatory Agreement

This agreement contains the responsibilities of the Partner as an Approved/Registered Centre of CMI in accordance with the requirements of the General/Standard Conditions of Recognition & Regulatory Principles as issued by Ofqual, Qualifications Wales, CCEA Regulation and SQA Accreditation as the regulators of qualifications and assessments. By signing the Agreement, the Approved/Registered Centre confirms its understanding of the terms and conditions and agrees to adhere to the requirements.

This enforceable Agreement commences on the date of the Declaration of Approval and continues for a period of three years, this is independent of any commercial agreement negotiated between the two parties. Any extension to the Declaration of Approval and the Agreement will be subject to review against moderation and audit reports conducted by CMI. The termination conditions are also contained within the Agreement.

#### 2.6 Termination of Approved and Registered Centre Regulatory Agreement

The Approved and Registered Centre Regulatory Agreement may be terminated before its expiry date by either CMI and/or the Centre, in writing, on at least six months' notice. However CMI can also suspend or terminate the Agreement at its discretion with immediate effect in the event of:

- Breach of this Agreement by the Partner or Approved Centre which is not remedied within 30 days of notice from CMI specifying the breach and requiring that it is remedied;
- Serious malpractice, maladministration or fraudulent activity by or on behalf of the Approved Centre or
- If the Approved Centre ceases to operate or trade, goes into liquidation or is unable to pay its debts when due.

Upon termination or expiry of the Centre Agreement for any reason, CMI and the Centre shall cooperate to minimise any consequential adverse effects on Learners and the Centre will be required to comply with CMI's instructions to ensure an orderly transfer of Learners to another Approved CMI Centre.

#### 2.7 Quality Managers Centre Application Review

During this stage of the approval process, the allocated Quality Manager reviews the prospective Centre's policies, processes, Staff and documentation. The Quality Manager will review the application and make comments against each of the application criteria. The Quality Manager may request additional information, evidence or clarification against any of the areas of the Centre approval criteria, before progressing for final approval. The Quality Manager may set low-risk actions that are to be completed within 2 months of the centre approval date.

As part of this approval process, Quality Managers may undertake a review of any associated educational standard reports for the Centre for example. Ofsted reports, Office for Students (OfS) (if applicable) for the last 3 years.

If the Quality Manager is satisfied that the potential Centre meets CMI's quality requirements, they will sign off that they have met CMI standards. During the journey towards being a CMI Centre, the Approvals Quality Auditor will engage with the Centre for qualifications and Staff approvals.

#### 2.8 Final Centre Application Approval

Final Centre application approval is undertaken by the Head of Awarding Body and Compliance and/or the Senior Quality Manager. They will review any comments and actions set by the Quality Manager before making the final decision on whether to approve or reject the application. There are a number of possible application outcomes:

- Full Approved Centre approval and qualification approval granted
- Registered Centre approval and qualification approval granted

- Full Centre approval and qualification approval granted with action plan
- Registered Centre approval and qualification approval granted with action plan
- Full Centre approval and qualification approval withheld subject to action plan
- Registered Centre approval and qualification approval withheld subject to action plan
- Centre approval and qualification approval rejected

If a Centre is granted final approval, then the Centre will then be allocated to the relevant Quality Manager to assign Centre Approval Risk Status.

#### 2.9 Assigning Centre Approval Risk Status

The Quality Manager will create a <u>quality assurance activity planner for the Centre</u> which will include details of further quality assurance activities based on the current risk status being applied. New Centres will be required to have a quality assurance visit within the first 6 months of Centre approval.

A risk calculator is used for guidance purposes to identify the level of risk that a Centre may pose to their compliance with their Regulatory Agreement with CMI. A separate risk assessment is used for qualification approvals. As part of the pre-approval and post-approval external quality assurance activities, Centres are continuously monitored and awarded a Centre Risk Status through the Quality Manager undertaking a risk assessment.

The task of identifying and managing risks associated with delivering regulated qualifications rests both with Centres and CMI as each party has a shared interest in ensuring the successful delivery of the qualifications, plus protecting the interests of Learners. Therefore CMI works with its Centres to successfully identify and manage each Centre's exposure to risk (that is, the probability of specific events occurring, and the potential impact if they did occur). The aim is to manage that exposure by taking preventative action to keep the exposure at an acceptable level, and in a manner that is cost-effective. CMI will primarily identify Centre risks through its quality assurance activity with Centres.

#### 2.10 Overall Centre Risk Rating

Whilst it is essential for CMI to risk rate against key areas, CMI believes it is also important to form an overarching risk view on each Centre's arrangements to:

- Ensure Centres receive the appropriate level of support and assistance from CMI
- Help inform the frequency and focus of future quality assurance activities
- Help assist Centre Staff in their internal risk management and resource allocation discussions
- Protect the interests of Learners
- Protect the integrity of CMI qualifications and the reputation both of the Centres and CMI
- Satisfy the focus of the regulators in providing robust evidence to demonstrate CMIs approach to supporting and quality assuring Centres is streamlined, supportive and appropriately targeted and proportional

Where the immediate risk to the integrity of CMI qualifications or to the interests of Learners is identified, the Quality Manager may recommend a sanction against a Centre. A level 2 sanction (registration stop) may also be applied due to financial risks, for example, non-payment of fees, and unresolved aged debt. Any sanctions recommended will be proportionate to the risk identified and range from levels 1 to 5, increasing in severity. Depending on their level, the application of a sanction may affect the Centre's registration or certification rights.

These risk indicators are based upon the following factors and generates a score which is then used to decide the level of risk status:

Factor	Pre Centre Approval / Post Centre Approval	Purpose of Centre Approval Risk Status
Assessment Arrangements		To assess if the Centre's assessment arrangements are consistent, valid, reliable and capable of meeting the

		needs of Learners, and the demands of CMI qualifications.
Quality assurance arrangements	Pre Centre Approval & Post Centre Approval	To assess if the Centre's internal quality assurance arrangements are able to ensure consistent, valid, reliable and capable assessment decisions.
Learner experience	Post Centre Approval	To assess whether the Centre is capable of ensuring Learners do not encounter a poor learning or assessment experience, are well informed, treated fairly and do not encounter any unnecessary bias or discrimination.
Future activities leading to potential level 2 - 4 sanctions being applied	Post Centre Approval	To assess the impact of suspected or actual cases of malpractice / maladministration on the Centre's ability to safeguard the effective delivery of qualifications and protect the interests of Learners.
Qualification delivery	Post Centre Approval	To assess the risk of the Centre offering additional qualifications in the future and/or qualifications in specific subject areas.
Finance	Pre Centre Approval & Post Centre Approval	To assess the potential for a Centre defaulting on its commitments to CMI
Other Awarding Body reports/intelligence	Pre Centre Approval	To assess the risk of the Centre not complying with the regulatory agreement, gained from information/intelligence from other Awarding Bodies/Regulators/other sources.
High mobility of Staff	Post Centre Approval	To assess the risk on delivery, assessment and internal activities based on the mobility/turnover of Centre Staff.
Centre registration and certification volumes	Post Centre Approval	To assess the risk to the Learner experience and delivery, assessment and internal activities being affected due to a significant increase in the Centre Learner registration and certification volumes.
International/Satellite Centres	Pre Centre Approval & Post Centre Approval	To assess the risk of the Centre not complying with the regulatory agreement, the risk to the Learner experience and delivery, assessment and internal activities being affected by international/satellite delivery sites
Management systems	Pre Centre Approval & Post Centre Approval	To assess if the Centre's management systems and resources are capable of ensuring the successful delivery of CMI qualifications.
Conflicts of Interest	Pre Centre Approval & Post Centre Approval	To assess the risk if the Centre's process for the identification, mitigation and management of Conflicts of Interest and Personal Interest is capable of ensuring that an adverse effect does not occur.
Experience of operating and delivering regulated qualifications	Pre Centre Approval	To assess the risk of the Centre not complying with the regulatory agreement, the risk to the Learner experience and delivery, assessment and internal activities due to the lack of experience of operating as a Centre offering regulated qualifications

#### 2.11 Assigning Qualification Approval Risk Status

Centres can apply to add to the portfolio of qualifications they deliver at any time following Centre approval. As part of the qualification approval package, the Quality Manager will review the Centre's qualification application. This could be via an approval visit or a desk-based activity.

Centres are advised that they must not begin advertising, delivering or assessing qualifications until approval has been confirmed by CMI.

CMI's approach to the monitoring of a Centre qualification remit is driven by this overall risk rating. The Centre's qualification risk status can be updated at any time.

There are a number of possible qualification application outcomes:

- Qualification approval granted and Qualification Risk Status applied
- Qualification approval granted subject to an action plan and Qualification Risk Status applied
- Qualification approval withheld subject to an action plan and Qualification Risk Status applied
- Qualification approval denied and Qualification Risk Status applied

CMI may decline Qualification Approval requests if Centres fail to meet qualification approval requirements. Although this decision cannot be appealed, CMI encourages Centres to re-apply when they believe they meet requirements.

#### 2.12 Evaluating Risks

#### **Risk rating of qualifications**

Each qualification will be awarded a separate risk status and this will indicate the level of moderation that is required for that qualification.

The status of the qualification approval (including such factors as the number of years approved, quality levels, sanctions, and actions to improve policy) will determine the size of sampling required for moderation. Regardless of the number of months a Centre has been approved by CMI, the first submission for moderation will always be 100% of all Learners' assessment of the submission submitted for any unit. Once CMI is content that the Centre demonstrates competence to deliver, assess and undertake the claims process, the risk rating can be reviewed.

These risk indicators are based upon the following factors and generate a score which is then used to decide the level of qualification risk status:

Factor	Purpose of Qualification Approval Risk Status	
Details of Staff involved in delivery, assessment and internal quality assurance including CVs, competencies, experience and Continuing Professional Development	$\alpha_{11}$	
Details of the location of delivery and appropriate assessment sites - Satellite Centre, Multisite		
Experience in delivering CMI qualification(s)	To assess if the Centre has sufficient experience of delivering CMI qualifications at different levels and in different subject areas.	
Details of any third parties the Centre works with to deliver, assess and internal quality assurance of the qualification	To assess the impact of the use of third parties on the Centre's ability to safeguard the effective delivery, assessment and quality assurance of qualifications and to protect the interests of Learners.	

Centres delivery, assessment and	To assess if the Centre has sufficient procedures and resources to
IQA process including	deliver, assess and internal quality assurance CMI qualifications in line
moderation/marking	with CMI requirements and the qualification assessment strategy
Details of how the Centre intends to quality assure the qualification	To assess if the Centre's internal quality assurance arrangements are able to ensure consistent, valid, reliable and capable assessment decisions.

#### 2.13 Additional Qualification Risk Controls - Conflicts of Interest/Personal Interest

There may be occurrences where Centre Staff are involved in the assessment and internal quality assurance of CMI qualifications, but are also owners/part-owners/directors or have a financial interest within the Centre. This may be perceived as the individual having a personal interest in the result of the assessment. This is where a particular individual's interests might impair their ability to make the objective, unbiased decisions that are necessary to ensure that CMI can deliver and award its qualifications in line with the conditions set out by our regulators.

As an awarding organisation, CMI must take all reasonable steps to avoid any part of the assessment being undertaken by any person who may have a personal interest in the result of the assessment, however, understand this may be unavoidable at smaller CMI Centres. Where, having taken all such reasonable steps, an assessment by such a person cannot be avoided, CMI must make arrangements for the assessment to be subject to a higher level of scrutiny, in the case of CMI this will be an increased sampling of Centres assessment and quality assurance judgements during moderation.

Where Owners/Part Owners/Directors are involved in the assessment and/or internal quality assurance and the organisation has less than 5 employees involved in the process, then CMI will apply a minimum of a 'Medium Risk' moderation sampling approach on all qualifications in line with our moderation strategy indicated at section <u>6.8 Sampling Size</u> of this document.

Centre may be directed to use the CMI Marking Service where there is an actual Conflict of Interest or Personal Interest in the assessment or internal quality assurance decision which cannot reasonably be mitigated. Resources to assess and IQA will be reviewed on a regular basis by CMI when staffing levels across any Centre changes, especially when Centre staff members are deleted.

From April 2023, Owners/Part-owners/Directors of CMI Centres will not be contracted to work as part of the CMI's internal marking, moderation or mapping teams if 'peer bias' cannot be mitigated. Peer bias relates to bias associated with working alongside other contractors who may be making assessment, moderation or appeal decisions for the Centre they own.

#### 2.14 Automatic Qualification Approvals

For certain qualifications, some Centres may be eligible for automatic qualification approval. For example; the Centre is delivering the qualification in the same subject but at lower levels to those already approved or Staff have moved Centres and have been approved to deliver at this level at another approved Centre. The Quality Manager will make the final decision whether to approve or reject the qualification application, and this may include actions required by the Centre.

Automatic approval is used when a qualification is replaced or updated (revised syllabus) with little or no changes. In these instances, Centres already approved to offer the preceding qualification may be eligible to offer the new qualification, without submitting an application. However, the qualification will be assigned as a medium risk status on the Centre's qualification remit until CMI is confident that the Centre meets the low-risk qualification status outcomes, highlighted in the table above. Some qualification approvals are not automatic, for example, where there is a significant change/difference in the delivery and assessment strategy between previous and new syllabus/qualification, or, where additional delivery and/or assessor competencies are required.

In this instance, Centres will be risk-assessed to ascertain if they are eligible and will be subject to ongoing quality assurance monitoring, as normal.

#### 2.15 Equivalent Units

Equivalent units are CMI QCF/RQF units which, when compared, are judged by CMI to have content and Learning Outcomes/Assessment Criteria equal to or greater than other CMI units. Equivalent units may look different to one other but, in short, CMI has decided they are sufficiently comparable.

In terms of claims for CMI units, CMI will consider 'Equivalent units' on an individual Learner basis, upon application from a Centre.

The most likely scenario to occur is where a Learner requests to top-up an old qualification with units from a new syllabus. In this instance, units from the old qualification will be considered against the new qualification.

The Equivalent Unit Policy can be found at: Policies - CMI (managers.org.uk)

#### 2.16 An Example of CMI Centre Journey

After the initial Centre approval, the Centre may deliver, assess and internally quality assure (depending on the level of approval). Additional aspects of the Centre journey may include:

- CMI QA Centre visit/audit
- Additional Staff approval
- Additional qualification approval

If during the journey to becoming a CMI Centre or following approval, the Quality Manager/Auditor comes across an aspect of the Centre's activities that is not in line with CMI standards, they will work with the Centre to ensure the activity is brought in line with CMI standards. This process will always be conducted in a supportive manner and in line with the CMI Sanctions Policy.

#### 2.17 Centre Visits

All Approved and Registered Centres that deliver CMI qualifications, whether they have current Learners or not, will be visited by a CMI Quality Manager.

Centre visits will be undertaken either face to face or virtually using appropriate technology. The frequency of these visits will be determined by a risk assessment of the Centre's Learner numbers, moderation/marking history and other factors.

International approval visits may take place virtually but an onsite visit is required at least once every three years. General Centre visits are in accordance with the wider policy, for example. in line with the Centre's risk rating.

# 2.18 Delays/Postponement/Failure to Attend to the Quality Assurance Monitoring Activity Process

There may be an agreed delay/postponement to the quality assurance monitoring activity due to any of the following reasons:

- Unable to access the required information for the activity for example. due to IT failure
- Unable to travel due to local and/or national restrictions, for example. pandemic, travel restriction
- Staff sickness/ Staff capacity
- Any legitimate issue

Where a Centre and/or CMI requests to delay/postpone a Centre quality assurance monitoring activity, this will be on an agreement from both parties, with a new date for the activity agreed as soon as practically possible.

Where a Centre fails to attend a virtual quality assurance monitoring activity the Quality Manager will contact the Centre to discuss the matter, with a new date for the activity agreed upon as soon as practically possible.

Where a Centre has requested to delay/postpone or fails to attend a quality assurance monitoring activity on 3 consecutive requests/times, then the Quality Manager will immediately place a level 2 sanction on the Centre until a quality assurance monitoring activity has taken place.

#### 2.19 Centre Quality Assurance Activity Schedule

- Newly-approved UK-based CMI Centres All newly-approved UK-based CMI Centres will normally have a face to face<sup>1</sup> quality assurance activity within 6-8 months of approval (Even if there are no registered Learners).
- Newly-approved International-based CMI Centres All newly-approved international-based CMI Centres will normally have a virtual quality assurance activity within 6-8 months of approval (Even if there are no registered Learners). All international-based CMI Centres will also have a face-to-face quality assurance activity within 36 months of approval (Even if there are no registered Learners).
- All CMI Centres All CMI Centres will have a quality assurance monitoring activity based on the risk rating applied to the Centre. These visits will either be a face-to-face physical visit to the Centre or undertaken virtually with the Centre
- Additional Centre Quality Assurance Activities There may be a requirement for an additional CMI Centre quality assurance activity outside the normal Centre Quality Assurance Activity Schedule, this may incur additional fee charges to the Centre. The frequency and requirement will be determined by CMI before the activity is undertaken. The following factors will be considered:
  - Issues with the Centre's internal quality assurance procedures
  - Malpractice and/or Maladministration Issues
  - Additional support to CMI Centres
- International-based CMI Centres International Centre visits are scheduled according to region, Centre risk, FCO guidance on travel and safety and efficient expenditure. Quality Managers will visit APAC and MENA Centres in line with the Centre Quality Assurance Activity Schedule above in any given year. Travel to the Americas has not as yet been required due to risk having been managed through the registered Centre route and a small number of Centres. Should this change, Centre visits in this region may be added.

Each Centre will be contacted to agree on a date and time for the proposed Centre visit/audit. When contacted, the Centre will be asked to provide relevant information and to check that their approval documentation is up to date.

On the day of the visit/activity, the Quality Manager/Auditor will meet/speak with the Programme Director and/or any relevant members of the Centre quality management team and/or members of the delivery and assessment team. They may also request to meet with CMI Learners or review feedback from Learners.

The visit will focus on the following key seven areas:

- Approved Centre details
- Outstanding actions/action plans
- Centre management and systems
- Centre Staff, staffing resources and monitoring
- Equality, diversity, data protection, (Health and Safety Applicable for all International Centres)
- Learner support
- Assessment performance and quality assurance
- Comments, actions required and risks (sanctions)

The following reports may be generated prior to each visit and discussed with the Centre:

<sup>&</sup>lt;sup>1</sup> Centre Quality Managers have the option to change to virtual if required.

- Current Learners This report will contain a list of all registered Learners currently on a qualification
- **Completed Learners** claimed certificates. This report is a list of all Learners who have been certificated since the date of the last visit
- Lapsed Learners This report will contain a list of all Learners that have not completed and have passed their qualification end date
- Withdrawn Learners This report will contain a list of all Learners that have been withdrawn by the Centre
- **Transferred Learners** This report will contain a list of all Learners that have transferred qualification.
- Staff list This report is a list of Centre-approved Staff
- **Moderation** This report shows moderation activity. Quality Managers have access to each submitted submission of Centre-submitted moderation and can view Moderator feedback reports for each submission

In advance of the visit, the Centre must ensure that these reports are accurate and updated if necessary by de-registering any Staff and/or Learners no longer involved in the assessment. Centres can find details of how to prepare for a CMI Centre Quality Assurance Meetings using the following support videohttps://www.youtube.com/watch?v=FULcNdEQNwM

#### 2.20 Quality Managers' Centre Visit Report (CVR)

On completion of a Quality Manager's activity, the Programme Director or representative will be provided with a verbal summary of findings. However, the Quality Manager will take time to reflect on findings and may request additional evidence following the quality assurance activity before evaluating all evidence and finalising actions and recommendations.

A Centre Visit Report (CVR) will be produced by the Quality Manager once the quality assurance monitoring activity is complete and this will include:

- Key findings against each of the seven sections with a rating against each section -
  - Effective Provision (EP)
  - Partially effective but requiring some changes/additions/actions (PE)
  - Significant changes/additions/actions required (CR)
- Areas of good practice
- Recommendations
- Overall summary
- Any applied actions
- Any applied sanctions

On receipt of this CVR, the Programme Director will check the report for accuracy and let the Quality Manager know within ten days if any amendments are required. If CMI receives no response within ten days of receipt of the report, it will be assumed that the Programme Director is in agreement with all content and will complete all actions within the set timescale.

#### 2.21 Centre Actions

Quality Managers will set actions to ensure Centres comply with CMI standards, requirements and regulatory agreements. Actions will be recorded in the CVR which will be sent to the Centre Programme Director following the quality assurance visit. The Quality Manager and Quality Auditor will monitor the completion of any actions set and if required may arrange a follow-up activity for additional support and/or monitoring.

#### 2.22 Centre Sanctions

CMI aims to work with Centres to prevent situations from arising that would warrant a sanction being imposed. This is done by carrying out a risk assessment of each Centre and the management of any identified risks through the creation of appropriate action plans. The Quality Manager will determine whether a Centre needs extra assistance to ensure it is compliant. The Quality Manager will identify the action(s) required by

the Centre to prevent any situation arising which would merit imposing a Level 1 (or above) sanction being applied to the Centre.

If the Centre fails to complete the action(s), or the Quality Manager identifies further issues that would threaten the integrity of CMI qualifications or reputation, this could result in a higher level sanction being imposed. If a Centre has previously rectified non-compliance issues in response to action plans but displays the same non-compliance issues again at a later date, this will be taken into account when considering whether to apply a higher sanction or increase the risk rating of the Centre in line with the CASS strategy.

All CMI Centres must sign and comply with the CMI Regulatory Agreement. This Agreement sets out the arrangements CMI has with its Centres to comply with the regulators' conditions and principles as a whole and to monitor, and (where necessary) take action to ensure the Centre does not put the Awarding Organisation's compliance at risk. A Centre which does not have a current Regulatory Agreement in place has a level 3 Sanction applied which prevents them from registering Learners or requesting certification for Learners.

If CMI finds that a Centre is not maintaining the standards required or not adhering to the requirements laid out in the Regulatory Agreement and/or associated policies and procedures, then CMI has the right to undertake action. In the first instance, CMI will provide support and feedback and assist in a process of continuous improvement. These action points will be recorded on the Centre Visit Report action plan and, depending on the level of the non-compliance (and the risk level), a sanction will be applied.

The Quality Manager/Auditor and the CMI Centre will agree on a date by which the actions should be implemented and this date will be recorded on the Centre Visit Report action plan.

Any corrective action will be implemented within a maximum of 3 months of the Centre Visit Report action plan being issued, or further actions and/or sanctions of a higher nature may be issued.

In accordance with CMI Qualification Risk Approval found at <u>Assigning Qualification Approval Risk Status</u>, CMI can at any time impose a 100% moderation requirement against a Centre. This can be in conjunction with any of the below sanctions.

Risk Level	Sanction	Maximum Allowable Time Frame
Level 0	Good practice points suggested	Next Visit
Level 1	Action Plan - Action points to be completed by agreed deadline	3 Months
Level 2	Suspension of Registration - Action points to be completed by agreed deadline	3 Months
Level 3	Suspension of Registration and Certification - Action points to be completed by agreed deadline	3 Months
Level 4	Removal of Approval for specific qualification(s) - Action points to be completed by agreed deadline	3 Months
Level 5	Withdrawal of Centre Approval. The Regulator will be informed	Immediately
Level 6	Dormancy	N/A

#### 2.23 Sanction Levels

CMI will monitor and evaluate the progress that a Centre has made regarding any sanctions that have been set. Where the non-compliance has been addressed then the risk level will be reviewed accordingly. Where non-compliance has not been addressed, or if further concerns are identified, then the risk level could be

increased. Where there is continued refusal by a Centre to address non-compliance then this can lead to the withdrawal of Centre Approval through a Level 5 sanction.

The CMI sanctions policy can be found at: <u>https://www.managers.org.uk/education-providers/policies-and-procedures</u>

#### 2.24 Centre Moving from Fully Approved to Registered

There may be instances when an Approved Centre will move to Registered Centre status. This may be due to the Centre no longer having the resources or processes to undertake assessment and internal quality assurance. Alternatively, CMI may move the Centre to Registered status to mitigate any adverse effects. In both cases, the Centre will be given instruction by CMI on how to use CMI marking services and any associated fees.

Ongoing CMI QA Centre visits/audits will be undertaken in line with the CMI Quality Manager's monitoring programme.

#### 2.25 Centre Moving from Registered to Full Approval

In the event that a Registered Centre moves to Approved Centre status, it will require a CMI QA Centre visit/audit and any actions from the visit to be completed. The purpose of this visit/audit is to ensure that the Centre has sufficient and robust assessment and quality assurance systems in place. There will be a requirement for the Centre to fully understand assessment, internal quality assurance and the CMI moderation process before submitting any work for moderation. The Awarding Body Team will support the Centre with this activity. The Centre will be subject to 100% moderation to ensure that the Centre's assessment and internal quality assurance decisions meet the requirements of the qualification. The sampling % will reduce when CMI has sufficient confidence in the Centre's assessment and internal quality assurance decisions.

Ongoing CMI QA Centre visits/audits will be undertaken in line with the CMI Quality Manager's monitoring programme.

#### 2.26 Dormant Centre

A dormant Centre is defined as a Centre that has paid its annual Centre fee but:

- Does not register any Learners within 12 months of becoming approved OR
- Has had registrations and completions but then has no registered Learners for a period of 6 months OR
- Has notified CMI that it is to make no registrations within the next few months.

In all the above cases, a Level 6 sanction may be placed under the discretion of the CMI Quality Manager and the Centre transferred to the CMI Awarding Body Quality Auditor.

In order for a Centre to return to Approved status, the following actions will be taken:

- A request will be received by CMI from the Centre to go live. This will be logged with the Quality Auditor.
- If the Centre has been dormant for longer than 12 months, the Senior Quality Manager or Quality Auditor will ask for a credit check to be instigated by the Approvals Team.
- The result of the credit check will be notified to the Senior Quality Manager who will decide whether the dormant status can be lifted. If the credit check causes concern, the Relationship Manager will be instructed to contact the Centre to inform them that due to an adverse credit check their request has been refused.
- The Quality Manager will conduct a Centre visit (which may be virtual). This will review any actions from the previous Centre visit and ensure that there are sufficient staff and resources in place to run the planned qualifications. Further actions may be applied.
- When the Quality Manager is satisfied, they will notify the Quality Auditor to lift the Level 6 sanction.

• If the Quality Manager is not satisfied, they will inform the Centre that a Sanction 6 will remain and explain the reasons for this. Service and the Relationship Manager will be informed.

#### 2.27 Centre Withdrawal

In the event that a CMI Centre should close down or approval ceases, the Centre is responsible for ensuring the safe transfer of any current Learners to an existing CMI Centre in accordance with the CMI Centre Regulatory Agreement. However, in the circumstances where the Centre is unwilling or unable to take these actions, then CMI will take steps to support the Learners and perform CMI's duty of care.

CMI and the CMI Centre will contact other CMI Centres within the same geographical area to identify the scope for Learner transfers. CMI and the CMI Centre will then communicate in writing to the affected Learners providing instructions on which Centres they can approach to continue their learning. Learners will be requested to confirm their intentions, for example, where they intend to resume their studies or whether they wish to withdraw from the qualification.

Where the Centre has been placed on a level 5 sanction, CMI will remove its approval status and begin an <u>enforced</u> withdrawal process in line with the Centre closure process. See: <u>https://www.managers.org.uk/wp-content/uploads/2020/03/Approved-Centre-Closure-or-Loss-of-Approval-Procedure.pdf</u>

Where the Centre withdrawal is due to occurrences of malpractice or maladministration, or any connected occurrence, it will as part of its regulatory obligations inform other Awarding Organisations of this. As part of its regulatory obligations, CMI will inform the relevant Regulator(s) of the Centre's withdrawal.

All outstanding invoices will be collected by CMI before the Centre is closed. Marking fees (if applicable) will be charged up to the final date specified in the notice letter. The CMI Centre cannot be closed until all remaining learners have been transferred or withdrawn by the original CMI Centre.

# ROLES AND RESPONSIBILITIES OF THE CENTRE

# Section 3 - Roles and Responsibilities of the Centre

#### 3.1 The Role of the Centre

All CMI Centres are responsible for delivery, fully Approved Centres only are also responsible for the assessment and internal quality assurance of CMI qualifications. The Centre is also responsible for:

- Marketing of CMI qualifications in a manner that does not mislead or misrepresent CMI qualifications and services.
- Reviewing the quality and consistency of delivery, assessment (if relevant) and internal quality assurance practices and decisions. These will be undertaken, recorded and provided upon request to the Quality Manager.
- Providing CMI with the information it requires.
- Ensuring that there are sufficient qualified Staff and resources for the administration, management, delivery, assessment and internal quality assurance of CMI qualifications.
- Ensuring that any changes to staffing are notified immediately and seeking Staff Approval via the CMI Hub prior to starting delivery/assessment/internal quality assurance on a CMI programme.

#### 3.2 The Role of the Programme Director

Each CMI Centre must nominate a Programme Director. This person will be the Centre's main point of contact for CMI quality assurance purposes. CMI Centre Programme Directors may be the Centre's Internal Quality Assurer or another person with responsibility for the administration or quality assurance functions. No specific qualifications are needed for the role of Programme Director, although experience in management and leadership qualifications are preferred. The Programme Director must be a person in a senior position or have decision-making responsibilities for the CMI course delivery. It is the responsibility of the Programme Director to ensure that all individuals involved with CMI qualifications are kept up to date with information from CMI and are aware of CMI requirements and regulations.

The Programme Director has the responsibility to CMI for the following:

- Overseeing the delivery, assessment and internal quality assurance of CMI qualifications.
- Ensuring that the delivery and award of CMI qualifications are in accordance with the Centre's Regulatory Agreement.
- Ensuring internal quality assurance meets CMI requirements.
- Maintaining accurate records at all times and ensuring that these are retained by the Centre for three years.
- Ensuring all Centre Staff receive relevant CMI communications.
- Ensuring Learner registrations are undertaken within six weeks of the start of the programme.
- Collecting CMI Learner registration fees.
- Checking and distributing Learner certificates in a timely manner.
- Ensuring that all claims for marking/moderation for completed units/qualifications are completed in a timely manner and in line with the Learners' qualification expiry dates.
- Managing unit completion status of non-continuing Learners to see if 'exit awards' can be claimed (at Centre discretion).
- Informing CMI of any changes to Learner details.
- Informing CMI of Learner withdrawals or changes of qualification or other changes to Learner status.
- Managing Learner requests for exemption, RPL, appeals and complaints.
- Managing and seeking approval for additional Learner assessment requirements.
- Informing CMI of Centre Staff changes in a timely manner.
- Informing CMI of Satellite Centre, Multi Centre or any third-party arrangements as soon as they arise.
- Reporting any case of suspected malpractice or maladministration immediately to CMI.
- Informing CMI of any changes to Centre details or circumstances, including change of ownership, contact details and any financial difficulties.

• Informing CMI formally of any institutional changes, for example, mergers with other organisations, takeovers, and bankruptcy.

#### 3.3 The Approval of a Centre Team Member

Assessing a new team member not only involves the Quality Manager/Auditor considering the individual's qualifications, and academic and occupational competence, but also the contribution the new team member will make to the overall team profile and expertise.

CMI's Quality Manager/Auditor is responsible for approving new and additional members of Staff involved with the delivery, assessment and internal quality assurance of CMI qualifications, prior to them delivering, assessing or internally quality assuring CMI qualifications.

# Please note, Centre administration staff must be applied for on the CMI Hub, but are not subject to providing any CV or competency background checks.

To add a new Staff member, please go to 'Our Staff' on the CMI Hub and upload the relevant details and if required (Delivery/Assessment/Quality Assurance Staff), upload the new Staff member's CV to the 'Add Staff Member' section. The application should clearly show the CMI qualification/s that the Staff member is involved in and their specific role(s) for each qualification (for example, delivery, assessment, IQA). Once submitted, the Quality Manager will review the application and either sign it off or return it to the Centre for more information.

Please note that Quality Managers/Auditor can withdraw the approval of a member of the Centre team at any time if they are found to have fallen below the accepted standard.

Quality Managers/Auditors will not be involved in the Centre's recruitment and selection process.

CMI is required to collect, record, monitor and provide information regarding Centre Staff qualifications and occupational competence to the regulatory bodies. It is therefore important that the Centre Staff records held by CMI are correct and up to date. Centres are able to view their Centre Staff information by selecting the Staff Summary Report in the reports section of the CMI Hub.

# 3.4 A New Member of the Centres Team involved in the delivery, assessment and/or quality assurance of CMI qualifications.

Centres are advised to first consult with their Quality Manager/Auditor regarding approval for an individual to be involved with CMI qualifications if they are unsure of the competencies required to deliver/assess and/or quality assure.

The following information must be provided to the Quality Manager/Auditor:

- A completed application in section 3.3 on the Approval Section of the CMI Hub along with the Staff member's CV.
- In the case of those working towards certification, a clear action plan for achieving the Assessor and/or Internal Quality Assurer qualifications.

Please note that Staff approval applications are required for Centre Staff at Satellite Centres too.

Please note that Staff involved ONLY in apprenticeship delivery for example, as workplace coaches or portfolio advisors (for example, they do not deliver, assess or IQA any part of a CMI qualification or units, for example, Unit 301 of the Level 3 Diploma in Principles of Management and Leadership), they **DO NOT** need to be submitted to the CMI Hub for approval.

#### 3.5 Staff Approval and Requirements

Centres must:

- Ensure that there are sufficient qualified Staff for the administration, management, delivery, assessment and internal quality assurance of CMI qualifications.
- Ensure that all Staff are approved by the Quality Manager prior to starting delivery/assessment/internal quality assurance of CMI qualifications. This approval is conducted via the CMI Hub and CVs or evidence of competencies **must** be supplied for any Staff involved in delivery or assessment, and the Staff member's role in each qualification given.
- Ensure that any changes to staffing are notified immediately and seek Staff approval prior to starting delivery/assessment/Internal quality assurance on qualification.

#### 3.6 Occupational Competence Requirements

Deliverers/Lecturers/Tutors/Assessors/Internal Quality Assurers must demonstrate that they:

- Have current, credible expertise in the subject area relevant to the level(s)/units they are delivering, assessing or quality assuring.
- Have current and credible expertise relevant to delivery, assessment or internal quality assurance.
- Maintaining their knowledge and keeping themselves up to date with developments in the subject area practice, delivery and or assessment, for example, can provide evidence of CPD.
- Have a thorough understanding of the qualification units at the level(s) they are delivering, assessing or quality assuring.
- If the above cannot be demonstrated, the Centre will need to provide sufficient evidence of how the proposed staff member will be trained and supported to meet the requirements, for example, for a new assessor, the Centre could arrange for the second marking of their assessment decisions.

#### 3.7 Evidence of Occupational Competence

Centre Deliverers/Lecturers/Tutors/Assessors/Internal Quality Assurers are required as a team to have a combination of appropriate competencies in learning, assessment and internal quality assurance methodologies. This must be underpinned by knowledge and experience in the subject area. This should be relevant to the qualification being delivered and the Learners undertaking them.

Centre Staff will be expected to meet a range of evidence indicators. The table below (see Section 3.15) shows the generic occupational competence requirements of Observers / Deliverers / Lecturers / Tutors / Assessors / Internal Quality Assurers. This is the criteria that CMI will use to decide whether new Staff members are competent to deliver and or assess CMI qualifications.

#### 3.8 SQA Accreditation Assessor and Quality Assurer Competence (From July 2021) Scottish Qualifications only

CMI has a small number of qualifications which are regulated by SQA Accreditation. This section aims to provide clarification and guidance relating to the qualification requirements for the assessment and quality assurance of competence-based qualifications including Scottish Vocational Qualifications (SVQs). This may also be used for assessing other types of qualifications that are supported by assessment strategies.

Assessors and Quality Assurers who currently hold D or A and V Units are still considered to be qualified Assessors and Internal/External Quality Assurers and are not required to undertake the Learning and Development (L&D) qualifications and units. However, they must be working to the same National Occupational Standards (NOS) and undertaking appropriate continuous professional development. Any new Assessors and Quality Assurers, who do not currently hold any of these predecessor qualifications, should undertake the current Learning and Development (L&D) qualifications.

The relationship between the current L&D Units and previous Assessor and Quality Assurer qualifications can be found below. Please note this is not an exhaustive list and assessment and quality assurance of the relevant qualifications must always be in line with the L&D NOS and in accordance with the specific assessment strategies dependent on the requirements of the sector.

#### Assessors

Title	Acceptable alternatives	
L&D 9D - Assess workplace competence using direct methods	<ul> <li>A2 - Assess Candidates' performance through observation</li> <li>D32 - Assess Candidate performance</li> <li>TQFE - Teacher Qualification (Further Education)</li> <li>Other qualifications that are based on L&amp;D NOS, such as TAQA (Training, Assessment and Quality Assurance)</li> </ul>	
L&D 9DI - Assess workplace competence using direct and indirect methods	<ul> <li>A1 - Assess Candidates using a range of methods</li> <li>D33 - Assess Candidates using differing sources of evidence</li> <li>TQFE - Teacher Qualification (Further Education)</li> <li>Other qualifications that are based on L&amp;D NOS, such as TAQA (Training, Assessment and Quality Assurance)</li> </ul>	

#### **Internal Quality Assurer**

Title	Acceptable alternatives	
L&D 11 - Internally monitor and maintain the quality of workplace assessment	<ul> <li>V1 - Conduct internal quality assurance of the assessment process</li> <li>D34 - Internally verify the assessment process</li> <li>Other qualifications that are based on L&amp;D NOS, such as TAQA (Training, Assessment and Quality Assurance)</li> </ul>	

**Please Note**: It is recognised that some CMI Centres use different terms for Verifiers, such as Internal Quality Assurers. These and other job titles for the same role are acknowledged.

#### 3.9 Approved Centre - Staff Approvals - A New Member of Centre Staff

Centres must ensure that Staff involved in the assessment and internal quality assurance are competent to perform their roles, and must provide appropriate training and development opportunities to ensure that these Staff meet the required standards set out in the qualification and/or assessment documentation. CMI Centres should use a Centre-specific email address for staff (for example, <u>joebloggs@trainingprovider.co.uk</u>), as non-Centre specific emails are a data privacy risk in the event of the staff member leaving the Centre.

It is advised that as part of the recruitment due diligence process, various checks are undertaken to establish the Staff member's fitness to practise\*. This may include DBS checks, qualification quality assurance etc and for Welsh and Scottish CMI Centres the following: \*Note: it does not mean being fit to teach in terms of health/medical fitness.

**WALES ONLY** - Under the Education (Wales) Act 2014, the Education Workforce Council is required to maintain a Register of Education Practitioners (the Register) in Wales. In accordance with the Education Workforce Council (Main Functions) (Wales) Regulations 2015, as amended, registration is a statutory requirement for:

- Registered Further Education (FE) Teachers
- Work-based learning practitioners

In accordance with these regulations, Employers have a legal obligation to ensure that their employees are registered with the Education Workforce Council before commencing work. This applies to employees working on a full-time, part-time (including hourly) or supply basis.

The Register of Education Practitioners can be found at: <u>https://www.myewc.wales/en/</u>

**SCOTLAND ONLY** - In accordance with The Public Services Reform (General Teaching Council for Scotland) Order 2011, The General Teaching Council for Scotland maintains a Register of Fit to Teach in Scotland. Being fit to teach means meeting the standards of professional competence and conduct that GTCS expects. The GTCS Standards for Registration and Code of Professionalism and Conduct set out these expectations but can be summed up by saying that it means having the right knowledge and skills (and applying them) and doing the right thing as a professional teacher.

Registration is a statutory requirement for:

- General Teachers
- College Lecturers (Currently piloting)

https://www.gtcs.org.uk/regulation/hearings-schedule-and-decisions.aspx

CMI expects its Centres' Staff to know and comply with requirements for recording assessment decisions and maintaining assessment records and must be familiar with all relevant policy and guidance documentation as part of the Centre and Staff approval process.

Assessing a new Centre member of Staff application not only involves the Quality Manager/Auditor considering the individual's qualifications, and academic and occupational competence, but also the contribution the new team member will make to the overall team profile and expertise.

CMI's Quality Manager/Auditor is responsible for approving new and additional members of Staff involved with the delivery, assessment and internal quality assurance of CMI qualifications, prior to them delivering, assessing or internally quality assuring CMI qualifications. Centres are advised to first consult Section 3.15, in the CMI Centre handbook and thereafter with their Quality Manager/Auditor regarding approval for an individual to be involved with CMI qualifications. However, Quality Managers/Auditors will not be involved in the Centre's recruitment and selection process.

The application must clearly show the CMI qualification/s that the Staff member is to be involved in and their specific role (delivery, assessment, IQA). Once submitted, the Quality Manager will review the application and either sign it off or return it to the Centre for more information.

#### 3.10 The Withdrawal of a Member of Centre Staff

To ensure that the information supplied to the regulatory bodies is correct, the Quality Manager/Auditor must be informed of any withdrawals from the Centre team. This can be done via the CMI Hub by going into Approvals/Our Staff and then clicking on the deletion button for the member of Staff who has left/is leaving.

The Quality Managers/Auditor can withdraw the approval of a member of the Centre team at any time if they are found to have fallen below the accepted standards.

#### 3.11 Updating a Centre's Staff Member's Details

CMI is required to collect, record, monitor and provide information, subject to local data protection law, regarding Centre Staff qualifications and occupational competence to the regulatory bodies. It is therefore important that the Centre Staff records held by CMI are correct and up to date.

To ensure that the information supplied to the regulators is correct, the Quality Manager/Auditor must be informed of any changes in Staff details:

• This can be notified to CMI by going into the CMI Hub > Approvals Menus > Section 3 > Our Staff and then clicking on the 'edit' button for the member of Staff whose details you need to update.

#### 3.12 The Role of the Deliverer/Lecturer/Tutor

The role of the Deliverer/Lecturer/Tutor is to train, engage and motivate CMI Learners. The Deliverer/Lecturer/Tutor is sometimes required to perform the role of an Assessor. Should this be the case, the roles and requirements of the Assessor are also required to be met.

#### 3.13 The Role of the Assessor

The role of the Assessor is to decide whether a Learner has provided sufficient evidence to demonstrate they have met the qualification requirements. This is achieved by judging the Learner's evidence and also knowledge and understanding against all learning outcomes and assessment criteria. It is important that Assessors provide support and guidance concerning the sufficiency of the evidence and that they ensure Learners clearly demonstrate knowledge and understanding and cross-reference any evidence against the appropriate units, assessment criteria and any other elements in the evidence presented for assessment.

#### 3.14 The Role of the Internal Quality Assurer (IQA)

It is the Centre's responsibility to carry out internal quality assurance within the Centre, thus ensuring and demonstrating that assessment decisions are valid and consistent, through monitoring and sampling internal assessment decisions and providing appropriate feedback to Assessors. A Centre must have an approved Internal Quality Assurer. Without an approved Internal Quality Assurer, Centres cannot submit claims for certification. The activity of claiming qualifications for Learners requires the submission of evidence that internal quality assurance has taken place. Internal Quality Assurers must not internally quality assure any evidence that they have themselves assessed.

It is expected that Staff allocated as Internal Quality Assurers in an Approved Centre either have a relevant IQA qualification or experience of the IQA process and that they are familiar with IQA good practices.

Therefore, CMI expects the adoption of suitable risk-based sampling strategies by the IQA of the Learner work and Assessor decisions. This would cover both formative (on programme) sampling as well as summative (end programme) sampling. The IQA is expected to prepare suitable plans and keep appropriate records.

With regards to the sampling of requests uploaded to the CMI Moderation system, CMI does not expect that every request will have been sampled, as the sampling plan may not include the Learners submitted in a specific request. It is not the intention that Centres should delay the submission of requests while the work of the entire cohort is completed, for example, Learners who submit to deadlines should not be penalised for not knowing the external moderation decision due to the late submissions of other Learners.

In every case, the IQA plans and records will need to be submitted for each request, showing the cohort in which the Learner is being claimed, for example. the Learner(s) being claimed in every request must appear in an IQA sampling plan/record, even if the assessment decision of their work has yet to be sampled.

# 3.15 Deliverer / Lecturer / Tutor Occupational Competence Requirements

The following is not an exhaustive nor restrictive list, and your CMI Quality Manager has the ability to take a pragmatic and holistic view of the proposed staff member's skills, experience and qualifications and any additional information supplied by the Centre to decide on their suitability to be involved with the CMI qualification(s).

Deliverer / Lecturer / Tutor	Evidence indicators	
occupational competence		
requirements		
Relevant and sufficient occupational experience appropriate to the level and breadth of subject areas of the qualification units for which the Centre is approved. NB – Staff delivering a unit are expected to be competent in the content of the unit.	<ul> <li>Minimum of three years' occupational competence and experience appropriate to the level and breadth of subject areas of the qualification units for which the Centre has been approved</li> </ul>	
A thorough knowledge and understanding of the subject areas appropriate to the level, breadth and content of the qualification units for which the Centre is approved.	<ul> <li>A relevant and sufficient qualification appropriate to the subject areas of the qualification units for which the Centre is approved, that must be equal to or higher than the approved qualification</li> <li>OR</li> <li>Substantial experience, knowledge and understanding of the subject areas of the qualification units at the level for which the Centre is approved.</li> </ul>	
Continuing Professional Development	<ul> <li>Evidence of participation over the past three years in Continuing Professional Development (CPD) appropriate to the level and subject area of the qualification units</li> <li>Desirable but not essential to have membership of a professional institute or association appropriate to the level and subject area of the qualification.</li> </ul>	
Knowledge, understanding and application of a range of teaching and learning methodologies relevant to the level and subject area of the qualification units for which the Centre is approved.	<ul> <li>Hold a valid and recognised Deliverer/Lecturer/Tutor qualification</li> <li>OR</li> <li>Show evidence of current (within the last three years) experience of delivering training appropriate and relevant to the level and subject area of the qualification units.</li> </ul>	
Knowledge of CMI learning and assessment processes.	<ul> <li>Previous experience of delivery of CMI qualification(s) appropriate to the level and subject area of the qualification or</li> <li>Knowledge of the RQF (or QCF) level descriptors appropriate to the level of the qualification, or HE standards within Universities.</li> <li>OR</li> <li>Completion of an induction programme to gain knowledge of CMI qualification(s) appropriate to the level and subject area of the qualification</li> </ul>	
For MoD Centres		
MOD / Civilian Instructors on military courses to meet the role requirements as stated on military job descriptions, with associated pre-requisite courses and site-specific induction completed as per local standing orders/SOPs.	<ul> <li>JPA Assignment Order from MCM DIV Glasgow.</li> <li>DTTT, DTS, DIME, DIT</li> <li>Defence Workplace Trainer (DWT) - Replaces DIT</li> <li>Defence Train the Trainer (V2) - Replaces DTTT</li> <li>Defence Trainer Supervisor - Replaces DIME</li> </ul>	
For Police Centres		
Police trainers to meet role requirements as stated in the 'Trainer Standard'	College of Policing Police Sector Standard for the Training of Trainers 'Trainer Standard'	

#### 3.16 Assessor / Assessment Observers Occupational Competence Requirements

The following is not an exhaustive nor restrictive list, and your CMI Quality Manager has the ability to take a pragmatic and holistic view of the proposed Staff member's skills, experience and qualifications and any additional information supplied by the Centre to decide on their suitability to be involved with the CMI qualification(s).

Assessor / Assessment Observers Occupational Competence Requirements	Evidence indicators
Relevant and sufficient occupational experience appropriate to the level and breadth of subject areas of the qualification units for which the Centre has approved	• A minimum of three years experience, appropriate to the level and breadth of subject areas of the qualification units for which the Centre has been approved.
Thorough knowledge and understanding of the subject areas appropriate to the level, breadth and content of the qualification units for which the Centre is approved.	<ul> <li>A relevant and sufficient qualification appropriate to the subject areas of the qualification units for which the Centre is approved, that must be equal to or higher than the approved qualification</li> <li>OR</li> <li>3 years experience in the subject areas of the qualification units at the level for which the Centre is approved.</li> </ul>
Continuing Professional Development	<ul> <li>Evidence of participation over the past three years in Continuing Professional Development (CPD) appropriate to the level and subject area of the qualification units</li> <li>Desirable but not essential to have membership of a professional institute or association appropriate to the level and subject area of the qualification.</li> </ul>
Knowledge, understanding and application of a range of teaching, learning and assessment methodologies relevant to the level and subject area of the qualification units for which the Centre is approved.	<ul> <li>Have a relevant qualification in teaching and/or assessment</li> <li>(Note - If assessing CMI work-based/practice-based competencies units/assessments, must hold an assessment qualification that contains evidence of assessing competence in the work environment)</li> <li>OR</li> <li>Demonstrate clear and sufficient evidence of a minimum of three years experience in teaching and/or assessment relevant to the level and subject area of the qualification.</li> <li>(Note - If assessing CMI work-based/practice-based competencies units/assessments, must demonstrate clear and sufficient evidence of a subject area of the qualification.</li> </ul>
CMI Coaching / Mentoring Qualification - Observation of the Assessment	The observation will be conducted by an experienced mentor, coach or tutor (for example - a membership of one of the following EMCC UK, ICF UK, AC bodies or hold a minimum 5 years experience of teaching that must include coaching, and hold an assessment qualification)
Knowledge of CMI learning and assessment processes.	<ul> <li>Previous experience in assessing of CMI qualification(s) appropriate to the level and subject area of the qualification</li> <li>OR</li> <li>Knowledge of the RQF (or QCF) level descriptors appropriate to the level of the qualification.</li> </ul>

For MoD Centres		
MOD / Civilian Assessors on military courses to meet the role requirements as stated on military job descriptions, with associated pre-requisite courses and site-specific induction completed as per local standing orders/SOPs.	<ul> <li>JPA Assignment Order from MCM DIV Glasgow.</li> <li>DTTT, DTS, DIME, DIT</li> <li>Defence Workplace Trainer (DWT) - Replaces DIT</li> <li>Defence Train the Trainer (V2) - Replaces DTTT</li> <li>Defence Trainer Supervisor - Replaces DIME</li> </ul>	
For Police Centres		
Police Assessors to meet role requirements as stated in the 'Assessor Standard'	<ul> <li>College of Policing Police Sector Standard for the Training of Assessors - 'Assessor Standard'</li> </ul>	

#### 3.17 Internal Quality Assurer Occupational Competence Requirements

The following is not an exhaustive nor restrictive list, and your CMI Quality Manager has the ability to take a pragmatic and holistic view of the proposed Staff member's skills, experience and qualifications and any additional information supplied by the Centre to decide on their suitability to be involved with the CMI qualification(s).

Internal Quality Assurer	Evidence indicators	
occupational competence		
requirements		
Relevant and sufficient occupational experience appropriate to the level and breadth of subject areas of the qualification units for which the Centre is approved.	<ul> <li>Minimum of three years of experience appropriate to the level and breadth of subject areas of the qualification units for which the Centre has been approved.</li> </ul>	
Thorough knowledge and understanding of the subject areas appropriate to the level, breadth and content of the qualification units for which the Centre is approved.	<ul> <li>A relevant and sufficient qualification appropriate to the subject areas of the qualification units for which the Centre is approved, that must be equal to or higher than the approved qualification <b>OR</b></li> <li>Substantial experience, knowledge and understanding of the subject areas of the qualification units at the level for which the Centre is approved.</li> </ul>	
Continuing Professional Development	<ul> <li>Evidence of participation over the past three years in Continuing Professional Development (CPD) appropriate to the level and subject area of the qualification units</li> <li>Desirable but not essential to have membership of a professional institute or association appropriate to the level and subject area of the qualification.</li> </ul>	
Knowledge, understanding and application of a range of teaching, learning, assessment and internal quality assurance methodologies relevant to the level and subject area of the qualification units for which the Centre is approved.	<ul> <li>Have a relevant qualification in teaching and learning and/or internal quality assurance</li> <li>OR</li> <li>Minimum of three years experience in quality assuring regulated qualifications or Higher Education programmes</li> </ul>	
Knowledge of CMI learning and assessment and internal quality assurance processes.	<ul> <li>Previous experience in the delivery of CMI qualification(s) appropriate to the level and subject area of the qualification or</li> <li>Knowledge of the RQF (or QCF) level descriptors appropriate to the level of the qualification or HE standards within Universities.</li> </ul>	
For	MoD Centres	
MOD / Civilian Internal Quality Assurers on military courses to meet the role requirements as stated on the military job description, with associated pre-requisite courses and site-specific induction completed as per local standing orders/SOPs.	<ul> <li>JPA Assignment Order from MCM DIV Glasgow.</li> <li>DTTT, DTS, DIME, DIT</li> <li>Defence Workplace Trainer (DWT) - Replaces DIT</li> <li>Defence Train the Trainer (V2) - Replaces DTTT</li> <li>Defence Trainer Supervisor - Replaces DIME</li> <li>Hold the above qualifications and internal quality assurance qualification</li> <li>OR</li> <li>Minimum of three years experience in quality</li> </ul>	
	assuring regulated qualifications or Higher Education programmes	
For Police Centres		
Police Internal Quality Assurers to meet role requirements as stated in the 'Internal Quality Assurer Standard'	<ul> <li>College of Policing Police Sector Standard for the Training of Internal Quality Assurers -'Internal Quality Assurer Standard'</li> </ul>	

#### 3.18 Management of Third Parties and Subcontractors Centre Staff

CMI recognises that Centres will not necessarily have the capability to employ full-time dedicated Staff for all the above roles. In these Centres, it is acceptable for Staff to be appointed on a part-time/fractional/freelance/ contractor basis. However, CMI will apply the same rigorous approach to Staff approvals for any such Staff that the Centre appoints. It is good practice to marry the Centre's criteria for employment for these roles with those of CMI.

The Centre will need to ensure that effective systems for the management of all third-party and subcontracted services and any Satellite Centre and ensure that all policies and requirements referred to in the regulatory agreement apply to these third parties and sub-contractors.

The Centre will need to ensure it has effective communication systems in place with third parties and sub-contractors to keep them up to date with the requirements of the CMI and the Regulatory Authorities.

The Centre must notify CMI when an existing third party and subcontractor relationships come to an end; when there are any proposed renewals of the contracts, when there are any actual/anticipated disputes, or when there is any change of control of the third party. CMI reserves the right to terminate third-party approval if the Partner does not properly supervise the operation of any contract between the Approved Centre and any third party.

As part of the quality assurance process, CMI reserves the right to visit and/or review a subcontracted/satellite Centre.

Should a Centre subcontract delivery/assessment/quality assurance to a separate organisation, this will need to be approved in advance by CMI. The Centre will need to complete the 'Third Party Relationship and Satellite Site Registration Form'. Then CMI will need to approve the Staff being used. This also applies to HEI, the satellite enquiry can be found at -

https://www.managers.org.uk/wp-content/uploads/2022/08/CMI-HE-Partner-International-Satellite-Centre-Enquiry-Form-August-2022.docx

#### 3.19 Team Role Matrix

In order to show who is responsible for key activities within the CMI qualifications an overview can be devised using the Team Role Matrix Document. Members of the team may have dual roles, for example, be an Assessor and an IQA but the matrix will offer a clear view of roles and responsibilities for each qualification the Centre delivers.

A template Team Role Matrix can be found at:

https://www.managers.org.uk/education-and-learning/partners-and-centres/policies/

This should be uploaded to section 3.3 of the CMI Hub and updated appropriately to reflect any changes in Staff as and when these happen.

**Exemptions** - for approved CMI Centres with dual accreditation, contemporary Module Leader Checklists, completed during the mapping process, with suffice as a proxy for a completed team role matrix for each programme mapped.

#### 3.20 Centre Staff Monitoring

Centres are expected to undertake appropriate supervision and training of their Staff in the appropriate approved roles.

CMI will provide regular communication and events to support Centre Staff undertaking Centre Assessment Standards Scrutiny. This will be in the form of webinars, partner engagement events and (where required) appropriate 1-2-1 training to support the validity of our qualifications.

Quality Managers will review Staff assessment performance as part of their quality assurance visits but also ongoing through analysing any trends in moderation reports and assessment referrals.

#### 3.21 Continuing Professional Development of Centre Staff

Deliverers/Lecturers/Tutors/Assessors and Internal Quality Assurers at CMI Centres that use CMI qualifications must provide evidence of their continuing professional development to the Quality Manager/Auditor upon request. The evidence must:

- Be properly recorded.
- Cover both personal and professional development.
- Show a clear and specific development plan, which does not include generalisations, but documents outcomes.

**Exemptions** - CMI Centres that are themselves awarding bodies, for example, universities, will not be required to produce evidence of individual staff CPD but general approaches to CPD may be discussed at Centre visits.

#### 3.22 Centre Staff Conflict of Interest

The Centre is responsible for identifying and managing conflicts of interest in the delivery and assessment of CMI qualifications. The Centre must ensure that there are no conflicts of interest with:

- Its interests in any activity undertaken by the Centre, on its behalf, or by any member of Centre Staff that could have the potential to lead to an act contrary to its interests in the delivery and award of CMI qualifications.
- A person who is connected to the delivery or award of qualifications by the Centre and who has interests in any other activity which has the potential to lead that person to act contrary to his or her interests in that delivery or of CMI qualifications.

Transparency and mitigation are the two key things to remember with conflicts of interest. Transparency relates to encouraging Staff to disclose conflicts of interest thereby allowing management of such scenarios. Mitigation is about having a clear policy on how conflicts are managed.

For further guidance on conflict of interest see the CMI conflicts of interest policy at: <a href="https://www.managers.org.uk/education-providers/policies-and-procedures">https://www.managers.org.uk/education-providers/policies-and-procedures</a>

Approved Centres are expected to have their own conflict of interest policy and upload this to the CMI Hub. Any actual or perceived conflicts should be logged and recorded and the form uploaded to the CMI Hub.

Any actual or perceived Centre conflicts of interest that could affect the awarding of a CMI qualification should be reported immediately to CMI at: <a href="mailto:awardingbody@managers.org.uk">awardingbody@managers.org.uk</a>

#### 3.23 Centre Staff Records

Centre Staff records that the Centre must retain for a minimum of three years\*, include:

- Tutor/Assessor/IQA vocational competence and continuing professional development (CPD) records
- CVs showing how Staff satisfy assessment strategy requirements
- Originals or CMI Quality Manager-endorsed copies of relevant certificates

\*Where a member of Centre Staff requests that their personal information is erased in accordance with General Data Protection Regulations, and this is within the 3 years requirement, then the Centre should inform their Quality Manager of this request for audit purposes.

# ASSESSMENT OF CMI QUALIFICATIONS

# Section 4 - Assessment of CMI Qualifications

#### 4.1 External Assessment/Marking

CMI offers the opportunity for all Centres to have their Learners' assignments externally assessed. CMI has external assessment briefs for all units from levels 2 - 7 of the Management and Leadership qualifications, levels 3, 5 & 7 of the Coaching and Mentoring qualifications, and for all Institute of Consulting (IC) qualifications.

This service provides Centres with a simplistic, professional and cost-effective way to get their CMI Learners' work assessed and certificated within a six-week period. Please note that during busy times, the lead time for marking may be longer than 6 weeks. Centres should also factor in the likelihood of referrals and be mindful that multiple submissions may be needed. Details on external marking fees can be found in the CMI Fees Guide: Information & Resources for Partners and Centres

Access to the CMI External Assessment/Marking is through an auto-enrolment form to gain CMI credentials: <u>Register for CMI Services</u>

#### 4.2 Assessment Planning and Reviewing

When a Learner is registered on a CMI qualification (regardless of it being an Award, Certificate or Diploma), the Centre needs to ensure efficient planning for delivery, assessment and internal quality assurance.

In designing the programme, the Centre must consider the appropriate level and size of qualification to be delivered and assessed and the last registration and certification dates for the qualification. CMI Centres need to ensure that there are sufficient resources available. This could include everything from having teaching Staff with appropriate knowledge and qualifications through to textbooks. Delivery can be via lectures or workshops, face-to-face or online, on its own site or within company premises depending on the needs of the Learners.

The Centre must take care and ensure that it reviews and then delivers the most current syllabus for the chosen qualification. These are available on the CMI website in the qualification resource library section: <a href="https://www.managers.org.uk/education-and-learning/qualifications/">https://www.managers.org.uk/education-and-learning/qualifications/</a>

Centres must then choose the most appropriate units to deliver, taking into account Learner and Client needs, teaching resources (Staff specialisms) and other resources available for delivery. Particular note must be taken of the rules of combination or any barred units in any qualification to ensure that the delivery ensures that the combination of units is valid.

It is prudent to ensure that an Internal Quality Assurer's role includes that of checking that the correct units are being claimed by checking the rules of combination in the syllabus used.

Centres should follow the delivery requirements as published in the relevant syllabus.

#### 4.3 Guided Learning Hours (GLH)

Guided Learning Hours (GLH) have traditionally meant education or training under the immediate guidance or supervision of a Lecturer, Supervisor, Tutor, Skills Coach or Employer.

With the increasing use of IT to improve the learning environment, facilitate the practical application of knowledge and make learning flexible to Learners outside of normal working hours and across different time zones, what constitutes 'immediate supervision' and indeed the value of immediacy is now in question. Participating in education and training now embraces many new and innovative forms which include synchronous and asynchronous methods. For this reason, CMI now considers immediate and non-immediate guidance or supervision as an acceptable practice in calculating GLH for CMI qualifications.

Immediate guidance or supervision	Non-immediate guidance or supervision
Synchronous - (simultaneous physical presence of Learner and tutor or remote presence by means of electronic communications)	Asynchronous ( pre-recorded sessions or directed learning with expected engagement hours, with Learners perhaps in different time zones)
Classes/lectures	Pre-recorded classes/lectures/podcasts
Online supervision and participation in Blogs, Chats, VLOGs	Post event contribution and feedback to blogs, chats, vlogs
Webinars by Tutors	Recorded webinars with recorded questions and an opportunity to ask questions after the event
Directed e-learning, for example, Management Direct/ MOOCs	Directed e-learning for example,., Management Direct/ MOOCs following tutor instruction.
One-to-one feedback sessions	Video feedback specific to a specific activity undertaken by the particular Learner
Online timed activities with the Tutor available throughout	Online timed activities with the Tutor available before and/or after the event

#### 4.4 CMI Assignment Briefs

For most qualifications and units, the Centre will have the option to use a CMI-written assignment brief. These can be accessed along with External Marking Sheets, Evidence Booklets and Assignment Briefs by logging on to the MyCMI system -

https://www.managers.org.uk/mycmi/qualification-support/qualification-assessments/ and looking for the CMI qualification support resources.

(Please note you will be prompted for your email to view these resources).

The assessment scenario may be amended by the Centre to suit the needs of the Learners or cohorts. However, the tasks and assessment criteria must not be changed. Use of the CMI assignment brief, although recommended, is not mandatory for approved centres. Registered centres must use CMI assignment briefs.

#### 4.5 Centre-Designed Assignment Briefs for Approved Centres Only

Where the Centre wishes to amend the tasks or to devise its own assignment brief (either in the case of CMI qualifications with no pre-written assignment briefs, or to tailor the tasks to a Learner cohort) then there are various considerations.

All adapted or bespoke assignments and applications for flexible assessment must be presented to the CMI assessment checking service for approval. This ensures that the assignment is endorsed and is recognized on the CMI system for moderation purposes. It also ensures that the assignment is fit for purpose and will produce evidence in a format that can be moderated by CMI. If assignments are altered without approval, Learner work may be returned to the Centre at moderation.

The assessment checking service is currently a **free** service. If fees are introduced this will be notified to Centres.

All applications for flexible assessment will be notified to your Relationship Manager and additional fees may apply to cover non-standard moderation costs.

These checks need to be carried out **prior to the assignment being issued to the Learners** to ensure Centre-designed briefs are 'fit for purpose' and will allow Learners to generate sufficient evidence to meet the assessment criteria. The CMI Awarding Body will provide a written agreement to the Centre when the assignment brief has been approved for use.

If the Centre is preparing its own assignment briefs, it is essential that these contain sufficient guidance and information for the Learners and are fit for purpose. They also should take into account any requirements for the Learner of reasonable adjustment or special consideration.

Guidance on Assessment Checking and template forms can be found at: <u>https://www.managers.org.uk/education-providers/policies-and-procedures</u>

If the Centre has delivered this unit previously, then feedback from Learners can be used to inform any future changes. Each Centre is responsible for gaining feedback in relation to Learner satisfaction. Assignment briefs should include:

- Accurate unit details
- Accurate qualification details
- Clear deadlines for assessment check
- All relevant assessment criteria for the unit(s) covered in the assignment
- Relevant assessment criteria targeted against each task
- A clear indication of the evidence the Learner needs to provide
- Tasks or activities which are likely to generate evidence which is appropriate and sufficient
- Tasks or activities set at the appropriate level
- A time period of appropriate duration
- Suitable vocational language
- A clear presentation format

#### 4.6 Flexible Assessment for Approved Centres only<sup>2</sup>

Assessment methods can include:

- Assignments
- Reports
- Professional Discussion (which includes the use of Professional Discussion to 'top up' or add evidence to strengthen written assignments)
- Projects
- Presentations
- Case studies
- Integrated work activities
- Time constrained tests
- Examinations

Centres must develop flexible assessment briefs which must adhere to the following requirements:

- The selected assessment task/activity is relevant to the content of the unit
- There are clear instructions given to Learners as to what is expected
- Learners are clearly told how long the assessment will take (if it is a timed activity), and what reference or other material they may use (if any) to complete it
- The language used in the assessment is free from any bias
- The language and technical terms used are at the appropriate level for the Learners
- It takes into account any reasonable adjustments or special considerations for the Learner

In addition to the specific assessment criteria in each unit, the Learner's work must:

<sup>&</sup>lt;sup>2</sup> This also includes the use of external portfolios, VLE's or shared drives for the purpose of moderation, outside of the CMI Moderation system

- Be accurate, current and authentic
- Be relevant in depth and breadth
- Have a word-count if a written assessment or in another format that is commensurate with CMI assessment guidance
- Provide sufficient evidence to demonstrate they have met the assessment criteria
- Include a signed declaration of authenticity to evidence that the work is their own

When assessed, a Learner should demonstrate that they have clearly grasped concepts, have the ability to link theory to practice and be able to communicate clearly the relevant discipline at the expected level for the qualification. In all cases, the work of the Learner must be sufficient to evidence that they have met each and every assessment criteria in the unit.

Queries on flexible assessment should be addressed to <u>product@managers.org.uk</u>. Any fees that apply will be notified at the time of enquiry. Approval for flexible assessment is granted via the assessment checking service. See the previous section.

In all cases, the work of the Learner must be sufficient to evidence that they have met each and every assessment criteria in the unit. The key point is whether the 'Command Verb' in each criteria has been met. Tutors should make themselves aware of command verb definitions and share these definitions with Learners. Definitions can be downloaded from the following link:

#### CMI Command Verbs Definitions List - July 2022

For fully Approved Centres, the sufficiency of evidence will be judged by the Assessor. A sample will also be quality assured by the Internal Quality Assurer and the CMI Moderator.

#### 4.7 Assessment Guidance and Evidencing Outcomes

CMI <u>Assessment Guidance Policy</u> provides Centres with guidance on word count, appendices, referencing, plagiarism and collusion, bibliography, referral/resubmission and structuring written assignments.

In addition to the specific assessment criteria in each unit, the Learner's work must be:

- Accurate, current and authentic
- Relevant in depth and breadth

and must also show the Learner's:

- Clear grasp of concepts
- Ability to link theory to practise
- Ability to communicate clearly in the relevant discipline at the expected level for the qualification

Where a Centre is marking it must be made clear as to whether a decision is a pass or refer. The CMI Moderator will expect to see this.

Within the CMI qualifications, the only grading which exists for assessment criteria (and overall for the unit) is either Pass or Refer, there are no merit or distinction grades awarded. The moderation of Learners' work only confirms that the required criteria for achievement have been met. Centres are, however, free to apply their own grade scales, but it must be made clear in all paperwork and therefore to the Learner that these are completely separate from the CMI qualification.

#### 4.8 Learner Authenticity

Authenticity declarations are a method of reminding the Learner that it is their own work that must be submitted for assessment.

For **Registered Centres** (where CMI undertakes assessment on behalf of the Centre) two levels of authenticity confirmation are required: Learner authenticity and Centre authenticity (signed by the deliverer/Assessor) forms are to be signed and provided.

CMI requires that each Learner signs and dates a written declaration. This is to confirm the work that has been handed in for assessment is their own and that any researched work is correctly referenced. Please refer to the CMI Plagiarism and Collusion Statement. This is aimed at avoiding plagiarism and allowing the Learner to only achieve recognition for their own work. CMI Centres should have a maladministration/malpractice policy in place to inform Learners of Centre expectations.

All CMI policies and procedures can be found at: <a href="https://www.managers.org.uk/education-providers/policies-and-procedures">https://www.managers.org.uk/education-providers/policies-and-procedures</a>)

The written declaration can be worded as follows:

"I .....confirm that the work submitted is my own and that I am the sole author of this completed assignment and the following has been checked prior to submission"

CMI has produced a Statement of Authenticity that should be used by Centres using CMI External Assessment. This is available on the website: <a href="https://www.managers.org.uk/education-providers/policies-and-procedures">https://www.managers.org.uk/education-providers/policies-and-procedures</a>

An electronic signature that is scanned is acceptable and also where there is a fully automated system for uploading evidence then a 'tick-box' to the statement is also acceptable.

The statement may be added to assignment briefs or given to Learners as a separate document to be handed in at the same time as the assessments being submitted for marking. This procedure needs to be completed for each piece of work submitted by a Learner.

Where CMI evidence booklets are used, the statement of authenticity may be integral to the booklet and in this case, a separate statement is not required.

In addition to a signed Statement of Authenticity for each Learner and each unit, at Centre visits the Centre may be asked to demonstrate how it checks that the work submitted is that of the Learner submitting it. This may be carried out through one, or a combination of, the following methods: professional discussions, tutorials, formative assessment, feedback and Assessor questioning relating to the work submitted. These additional checks must be recorded and the records maintained in accordance with CMI policies and procedures.

If the Centre is delivering CMI qualifications via distance learning please ensure the CMI's Distance Learning Policy is read and understood and that the Centre meets the additional authenticity requirements.

CMI policies and procedures can be found at: Policies for Partners and Centres

#### The use of a viva to confirm the authenticity of Learners work - Exception Only

A viva can be used by Centres when they wish to clarify that the work submitted has been produced by the Learner thus establishing authenticity. It gives the Centre assessment Staff the opportunity to explore any issues or areas that require clarification. Centres may have a strong sense of the outcome from the Learner's submission, but the viva gives an opportunity for the Learner to defend their work, as well as to validate the authenticity of the submission.

The viva must be recorded in either digital or paper format (see the guidance in section 4.15) and be presented as evidence at moderation, it must be noted on the notes sections of the moderation claim that 'a viva has taken place to validate the authenticity of the learner and evidence will be provided on submission'.

## 4.9 Best Practises for Reducing Learner Collusion and Plagiarism

Plagiarism and collusion are very serious offences and any Learner found to be copying another Learner's work or quoting work from another source without recognising and disclosing that source will be penalised.

#### Definitions

**'Plagiarism'** means presenting work, excerpts, ideas or passages of another author without acknowledging appropriate referencing and attribution.

**'Collusion'** occurs when two or more Learners submit work which is so alike in ideas, content, wording and/or structure that the similarity goes beyond what might have been mere coincidence. It must be made clear to all Learners and Staff that whilst the discussion of ideas, working in groups (as directed by the CMI Approved Centre) and other forms of verbal discussion are acceptable, the sharing of a Learner's written response to an assessment is NOT acceptable. To do so, even with the best intention, leaves the Learner open to their work being used without their knowledge and could lead to allegations of collusion. Learners and Staff MUST be advised that the best practice is not to share, in any format, written thoughts, ideas or assignments which are being used for CMI qualifications.

#### Use of Artificial Intelligence (AI) Software in Assessment

CMI considers the use of Artificial Intelligence (AI) software by a Learner to generate completed assignments or generate partially completed assignments which are then finished off by the learner to be a form of collusion in that the software itself proxies for another person whose output is being used in lieu of the assignment being completed by the learner themselves.

Both are considered by CMI to be serious matters, which will be dealt with in accordance with its published Malpractice and Maladministration Policy and Procedure.

When it comes to reducing plagiarism and collusion, the best approach is that the Centre educates both the Learner and the Staff on the nature of plagiarism and collusion, methods of detection, and the impact and disincentives them from engaging in it.

It is important to help Learners and Staff understand:

- What collusion and plagiarism are and their different spectrums of them.
- Understanding the boundaries of collusion and plagiarism can prevent them from inadvertently crossing the line.
- Develop the Learner's research skills and develop their confidence in their own abilities reducing the temptation to undertake collusion and plagiarism.
- The methods of detection for collusion and plagiarism, for example, software, second marking, and moderation.
- The impact and further consequences of their study as a result of collusion and/or plagiarism.

Methods to reduce plagiarism and collusion

- Provide practical guidance on plagiarism and collusion, for example, Policy, Handouts, and Presentation.
- Provide study support to Learners.
- Provide development feedback to try and reduce the Learner's urge to collude or plagiarise.
- Use collusion/plagiarism resistant assignments briefs/tasks.<sup>3</sup>
- Use appropriate methods to detect collusion and/or plagiarism or example, software, second marking, moderation.
- Use appropriate methods to address incidents of collusion and plagiarism when they are detected.
- Actively discourage the use of Artificial Intelligence (AI) software to complete assignments.

<sup>&</sup>lt;sup>3</sup> Only Approved CMI Centre - All bespoke/flexible assignment briefs must go through CMI assessment checking service.

# 4.10 Centre Feedback to Learners on Assessments - Approved or Registered Centres using the CMI Marking Service

It is recognised that many Centres using the CMI Marking Service provide some level of formative feedback to Learners in advance of the assessment being submitted for summative assessment by CMI.

Centres should follow the guidance for formative assessment feedback in Section 4.11 and also note other assessment guidance.

In cases where the formative feedback identifies the need for Learner amendments, this is **NOT** required to be done in different colour fonts when submitted to the CMI Marking Service. The Centre may ask the Learner to provide additional information in different colours to aid the formative feedback process, but when work is submitted as a first submission, this MUST be in the same colour font (black) throughout. Should the CMI Marker refer any work, the resubmissions should follow the guidance in Section 4.12.

#### 4.11 Centre Feedback to Learners on Assessments by Approved Centres

Constructive and developmental feedback by the Centre assessment Staff is key in ensuring that Learners meet the assessment criteria requirements of the CMI qualification.

It is important that feedback is used in both a formative and summative assessment approach.

**Note:** Approved Centres must always ensure that the Assessor and the internal quality assurer are not the same person and there are clearly defined roles and responsibilities between assessment and quality assurance.

#### Formative Assessment Feedback

The goal of formative assessment is to monitor Learner progression and to provide ongoing feedback that can be used by Learners to improve their assessment before the final submission of their CMI assessment. More specifically, formative assessments:

- Help Learners identify their strengths and weaknesses in their assessments
- Help Centres recognise where Learners are struggling and address problems immediately

It is suggested that formative feedback does not indicate whether specific criteria have been passed or referred - this is the role of summative assessment.

#### Summative Assessment Feedback

The goal of summative assessment is to evaluate the assessment at the end of a unit/qualification by comparing it against the assessment criteria.

#### Assessment Ready

CMI recommends that both formative and summative assessment feedback is given to the Learner throughout their learning journey. The moderation methodology used by CMI for Approved Centres requires that the Learner work submitted for moderation should have already gone through the internal assessment and quality assurance processes (internal quality assurance) and meets the required assessment criteria standard.

In other words, the **ONLY** work which should be submitted for CMI moderation is that which has been judged by the Assessor and IQA (where sampled) as having met and passed all assessment criteria. The CMI moderation process is checking that the assessment and internal quality assurance judgements have been made correctly in line with the assessment criteria of the units/qualifications. Assessors/Markers must clearly print/write their names on all marking/assessment feedback sheets. This information is critical in ensuring that CMI can identify that only approved Centre Staff have undertaken the assessment marking process.

# Whether the Learner's work is being summatively assessed through the CMI marking service, or by the Centre's Assessors, a maximum of 3 summative submissions is permitted.

#### Feedback <u>MUST</u> be given against the Assessment Criteria (AC) and not the task.

#### Feedback Tips

- All feedback should be about the Learner's work and not the Learner.
- If it is not asked for in the CMI Syllabus, do not give feedback about it.
- Has the command verb been met?
- Use the 3-step feedback process:
  - Indicate Pass/Refer
  - Explain why (for example,. 'This AC has been referred because...You have not evaluated...') and include developmental feedback
  - If referred, then explain what the Learner needs to do. Feedback should tell the Learner what to do (actions), **not** how they should do it
- When giving feedback do not just regurgitate the AC but do ensure that the correct command verb is used. CMI command verb word definitions can be used to explain what the Learner needs to do.
- Follow the AC when marking. The 'Good Practice' from the syllabus is guidance only. The work must meet the assessment criteria not the task. If the AC indicates an answer that is plural, then this means at least two. Where a range is indicated, this means at least two. Where the task asks for different numbers, the AC is to be adhered to, not the task.
- The amount of feedback should typically be 1 2 sentences per AC. Remember to use the command verb definitions to help to phrase your feedback.
- If the evidence does not appear to be present, ensure you check to see if it has been included elsewhere (some of the briefs do not include criteria sequentially).
- Do not use feedback that is personal opinion or emotional, for example, '*I think*', '*I feel*'. Keep feedback factual, objective and supportive.
- Ensure that all areas of the mark sheet are completed in full, including the result against each AC and the overall unit grade at the top of the page.
- Feedback should be supportive and encouraging. Avoid using words such as "basic" or "limited". These can feel very negative to Learners.
- Where you feel the pass is borderline state this in the feedback, not in the result column. Only "pass" or "refer" is to be used.
- Referencing. Where the Learner uses someone else's work they must acknowledge the original source. The Learner does not have to use Harvard referencing.
- The Learner does not have to use a bibliography. If there is no bibliography it is not a refer.
- Structure and format if you do not like the format it is not a refer. You should make a recommendation in the feedback comments.

#### 4.12 Assessment Referrals by CMI and Centres

Please ensure that internal planning at the Centre allows for the possibility of referrals (for example. where work is sent back for correction and needs to be resubmitted.)

- There is a colour-coded system of feedback which is used by CMI markers. The same system is encouraged for use in all Centres that undertake their own marking to adopt:
  - **First** submission Learner submission is in **BLACK** CMI feedback is in **BLACK**.
  - Second submission is in **BLUE** CMI feedback is in **BLUE**.
  - Third submission is in RED CMI feedback is in RED.

- Learners are required to submit entire assignments, **not just the bits they have altered**. Partial submissions will be returned if submitted to CMI for remarking.
- Please ensure work is submitted within CMI word count guidelines. Check the word count before you mark the work. Work that is over the word count should be returned for editing to the Learner.
- Where the use of English is so unclear to have prevented you from passing a Learner's work, please insert this phrase:
  - "The marker has been unable to award a pass without making assumptions to determine the meaning or intent of the answer. Please edit your work to ensure your answers are clear and we would recommend that the assignment is proofread to ensure clarity of meaning. Please refer to your tutor for support."
- If you identify any quality issues, or suspect malpractice of any kind, contact your PD and QM to discuss.

#### 4.13 Guidance for Assessment

**File Format for Assessment Submissions to CMI** - Centres should ensure that any Learner submissions follow the requirements in the qualification syllabus and/or assessment brief. Learners must use either Microsoft Word (.docx), Google Docs (.docs), OpenDocument Text (.odt) or Rich Text Format (.rtf) in the completion and submission of their assessments. Centres should submit assessments to CMI's Marking or Moderation systems using these formats only. There is no requirement for Centres to PDF any Microsoft Word, Google Docs, OpenDocument Text or Rich Text Format documents before submission, they can be left in their original file format.

Where it is not possible to submit the learner's work in these formats, then only in exceptional cases can a PDF or other file format may be submitted. Centres should contact their CMI Quality Manager prior to submission. Where a PDF document submission has been authorised by CMI for submission, then any comments/feedback that has been added by the Centre on these documents must be clearly visible in the document.

CMI may request where the Centre has uploaded PDFs without prior authorisation, to convert them to (.docx), (.docs), (.odt) or (.rtf) format so they can be accessed.

Other forms of assessment submissions are permitted if prior agreement with CMI has been authorised, for example, an agreed flexible assessment in the form of a presentation, or audio & video files.

Attachments & Appendices - Learner work should aim to minimise the number of unnecessary attachments or appendices unless specifically allowed for in the assignment brief. Information that is essential to the Learner's work in order to meet the learning outcomes and assessment criteria should be included within the main body of the report. This applies to all work, whether assessed by the Centre or externally assessed by CMI.

When work is externally assessed by CMI, appendices will NOT be marked. When marked work is submitted to CMI for Sampling, appendices will NOT be moderated.

**Word Count** - Learners must comply with the required total word count as stated on the assignment brief, within a margin of +/- 10%. This applies to all work whether it is assessed by the Centre or externally assessed by CMI.

The excessive use of word count in assignments is not grounds for a referral. However, CMI reserves the right to return work to the Centre for editing and resubmission by the Learner, if the word count is excessive. CMI has the right to apply individual word count concessions when an assessment has been referred, for example, if the marker or moderator requires additional elaboration to meet the assessment criteria, the original word count may be exceeded.

It is good practice for Learners to state the total word count at the front of their assessment.

There may be instances where Learners require reasonable adjustments for assessment that includes approval of increased word count. In this instance, Learners should signpost their assessment to highlight where assessment criteria have been met. All applications for Reasonable Adjustment must be approved in advance. For further information, please refer to the CMI Reasonable Adjustments Procedure.

**Tables, Graphs, Diagrams, Bullet Points** - All use of tables, graphs, diagrams, Gantt charts and flowcharts should be incorporated into the main text of the assignment, but not included in the word count. Any published secondary information such as annual reports and company literature should be referenced in the main text of the assignment but not included. Embedded documents within the main text do not count as part of the word count.

Excessive use of tables, excessive use of embedded pictures or excessive use of words in tables in the main text may be returned for editing. Please ensure that Learners **answer the assessment criteria in their own words** and only underpin what they have said with a reference if necessary or appropriate. Learners should be aware of the overuse of referencing theories in their work and should balance their responses, theories and contextualization to their own roles and experiences

The excessive use of bullet points should be deterred, if using bullet points then there should be a sufficient narrative around the bullet points to convey context and application of knowledge.

Further assessment guidance can be at: <a href="https://www.managers.org.uk/wp-content/uploads/2020/03/Assessment-Guidance-Policy.pdf">https://www.managers.org.uk/wp-content/uploads/2020/03/Assessment-Guidance-Policy.pdf</a>

### 4.14 Confidentiality and Commercially Sensitive Evidence

It is important that Learners are fully able to articulate their answers/responses when responding to assessment requirements. Often CMI Learners work in environments or organisations that require a certain amount of commercial confidentiality and/or deal with classified information or security matters, so this may often inhibit or show "vagueness" in the response to an assessment.

Dealing with commercial confidentiality or security issues of presenting work-based evidence should lie with the Learner and Centre in the first instance, however, CMI has a responsibility to maintain the confidentiality of sensitive information that is presented for marking or moderation purposes.

In order to reduce the risk of disclosure of confidential or sensitive information, Centres and Learners should where possible apply the following rules:

- Redesign the assessment so there is no breach or disclosure of confidential or sensitive information.
- Where it is not possible to redesign the assessment and if the Learner wishes to include confidential or sensitive information then it should be sufficiently redacted. If the redacted information is pertinent to the evidence being put forward (for example, it provides evidence towards a competency) then a contextual statement detailing how the evidence meets the competency is acceptable. This contextual statement should be completed by the Learner and underpinned by a confirmation statement from the Employer or Centre.
- Witness testimony in support of the redacted evidence will also be accepted from peers, line managers and supervising clients.
- Centres may wish to contact CMI and discuss the possibility of a non-disclosure agreement (NDA), however, please note this will have to be explored by CMI's legal team.
- Clearly mark assessment materials which have been determined to be confidential or sensitive and inform CMI before submission for marking or moderation purposes.
- Restrict access to confidential material to people who need it.
- Offer training for Centre Staff with access to confidential or sensitive assessment material on how to maintain confidentiality.
- Monitor the content of the assessment to assure that confidential or sensitive information shared during the assessment is then not further disclosed.

CMI does not require specific client/organisation names. Client/organisation names CAN be anonymised, replacing

them with 'Client A', 'Client B', etc.

We can assure you that any confidential or commercially sensitive information that is shared with the CMI will remain secure within our systems for the purposes of assessment and quality assurance.

All of our Staff involved in the quality assurance process have been trained in GDPR compliance.

#### 4.15 E-portfolios or Moderation outside CMI's Moderation System

For moderation of e-portfolios, The evidence must be signposted by the Assessor in the assessment record. CMI Moderators will return moderation back to the Centre for correct signposting prior to re-submission - where this is not found. When requesting moderation of an e-portfolio, please provide an evidence locator (signposting) document (with links) clearly stating where the following information can be found:

- Learner work/assignment with Learner authenticity statement (sample to be defined by CMI)
- Centre/Learner authenticity statement
- CMI marksheet completed with feedback against each assessment criteria
- Internal quality assurance form for each Learner that has been internally quality assured
- Internal quality assurance sampling plan for the cohort being uploaded

If this information is not signposted clearly, the Centre will be asked to resort to uploading this information to the CMI Moderation Service.

Please note there may be additional fees for undertaking moderation outside of the CMI Moderation System.

#### 4.16 Audio and Video Evidence

Provision of audio or video evidence should be agreed upon via prior arrangement with the CMI Quality Manager, Marker or Moderator, this includes where this is part of a formal reasonable adjustment / special consideration request. Evidence submitted as audio or video evidence will be considered to be a flexible assessment. If the Centre is marking, flexible moderation fees may apply. If CMI is marking, flexible assessment fees may apply.

Audio and video files are larger than normally expected so it is imperative that the evidence within the audio or video file is signposted for efficient locating. Files should be time-stamped and an evidence locator document provided with the submission.

If the evidence is not signposted clearly within the file, the file will be returned to the Centre and the Centre will be asked to provide a document more closely locating the evidence for marking or moderation purposes. A good practice is to indicate the time location within the file where specific CMI assessment criteria (AC) are located.

#### 4.17 Centre Record Keeping

Effective assessment record keeping is an essential requirement for all CMI Centres. The Centre is accountable for maintaining records for audit purposes and these requirements form part of the Regulatory Agreement between the Centre and CMI. It is important that Centres keep records in accordance with Data Protection requirements for a minimum of three years and make them available for the purposes of resolving any issues arising from external quality assurance or appeals. This includes keeping Learner and assessment records from the date that the Learner has been certificated (or for lapsed or withdrawn Learner(s), the date they should have completed). These actions are required for regulatory compliance purposes and, as such, records must be made available to the Regulatory Authorities upon request.

CMI expects that Centres will retain copies of the assignments and assessment paperwork, in addition to any mapping to the assessment guidelines or learning outcomes, to show that all qualification requirements have been met by Learners and that the assessments themselves are valid, reliable, fair and appropriate.

## 4.18 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.

#### 4.19 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
  - $\circ$   $\;$  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

#### 4.20 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

Assessors and Learners must provide a written declaration or using an electronic 'Click to Declare', that Learner evidence is authentic and that 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.

#### 4.21 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

#### 4.22 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.

### 4.23 CMI Systems (Moderation Portal, Marking System, CMI Hub)

Where Learner and Centre assessment evidence is uploaded to the CMI moderation portal for external moderation, or to the CMI marking system, CMI will be able to access this information as required. This information is stored on a secure cloud-based system with appropriate security and backup.

Where Centres use electronic assessment records and/or e-portfolios, these must be kept in accordance with regulatory requirements and where assessment records are archived in the 'cloud', then access for 3 years must be assured.

#### 4.24 Notification of Loss of Assessment Records

CMI expects all Centres to retain assessment records in a secure location that prevents fire, theft, and loss, damage or other circumstances.

All Centres are required to inform CMI if any assessment records are put at risk. This includes any natural disaster, fire, theft, loss, damage or other circumstance which places the existing accommodation or secure storage of assessment records at risk.

## ASSESSMENT OF CMI QUALIFICATIONS

## Section 5 - Internal Quality Assurance of CMI Qualifications

## 5.1 Quality Assurance Coordination

The aim is for Learners to achieve true competence. This enables them to demonstrate skills, knowledge and understanding and show an ability to transfer these to a variety of situations. The defined learning outcomes and assessment criteria within the CMI units are used in the assessment of Learners at work and the structure of the qualifications. This then enables the Learner to build units of competence in order to gain a full qualification.

## 5.2 Quality Assurance Structure

There are specific roles within the quality assurance process between CMI and its Centres. Please see the chart below -

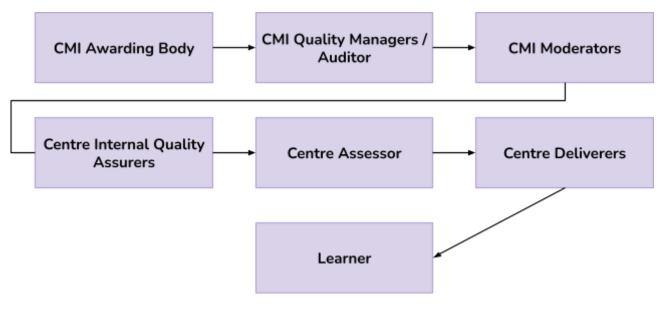


Figure 1 - Quality Assurance process

## 5.3 Internal Quality Assurance

The Internal Quality Assurer is responsible for ensuring that the internal assessment processes at the Centre are fit for purpose. The Internal Quality Assurer must also manage communications in the Centre effectively.

## 5.4 Internal Quality Assurance of Centre-Devised Assignment Briefs

CMI assignment briefs can come from either the CMI Centre or are pre-written (as when using a CMI External Assessment). Either way, the principal reason for an assignment brief is to give clear instruction to the Learner as to what is expected and how the brief matches the learning outcomes and assessment criteria. CMI Centre assignment briefs should be written by someone who is familiar with the occupational areas being assessed and agreed with the Quality Manager/Auditor.

CMI Centre-devised assignment briefs must be internally quality assured before they are issued, as this will ensure:

- The tasks and evidence produced by the Learner match the learning outcomes and assessment criteria
- Learners' roles and tasks are vocationally relevant and appropriate to the level of the qualification

- Equal opportunities are incorporated
- CMI Centre assignment briefs are clear and use accessible language

### 5.5 Quality Assuring the Assessment Process

All CMI Centres should provide robust and objective feedback to Assessors.

Quality assurance is about standardising assessment decisions and processes. This means making sure the Assessors are assessing in similar ways across all CMI Centres.

This means:

- Having a procedure for sampling the work of the Assessors and Learners and following it
- Identifying problem areas and inconsistencies and dealing with them
- Standardising Assessors' judgements and the quality of their documentation
- Ensuring that the requirements of CMI and the appropriate assessment strategy are met, and submitting Learners' work for moderation

The Internal Quality Assurer must ensure that their written feedback to Assessors is recorded on the CMI Centre IQA feedback form and the feedback must be directed to each Assessor and should address their assessment practice. The Internal Quality Assurer should avoid generalised statements such as 'Well done to both of you. Lots of hard work undertaken'.

Precise, focused comments on the assessment undertaken help to support the Assessor's development and evidence the rigour of the quality assurance activity.

The Internal Quality Assurer is required to check the unit(s) identified in the sampling plan.

#### 5.6 Internal Quality Assurance Rationale

A robust and effective IQA system will start with a rationale. This will clearly explain why IQA takes place in the Centre, for example, to meet the requirements of CMI as an awarding body, to maintain the credibility of CMI's qualifications and to maintain the reputation of your organisation. Having an IQA rationale will help to ensure that all IQA practices and assessment activities at the centre are **robust**, **safe**, **valid**, **fair** and **reliable**. Once the rationale has been agreed it's time to consider the IQA strategy.

#### 5.7 Internal Quality Assurance Strategy

The IQA strategy is a working document and the starting point for all of the IQA activities to be undertaken at the Centre. It should be based on the rationale and built around the risk factors identified at the Centre (This will be an ongoing process that is regularly reviewed), a risk-based sampling strategy should be used alongside other methods of sampling rather than be a separate type of sampling. Having an IQA strategy in place will help to ensure the Centre has effective plans in place that clearly identify what will be monitored and that the systems to be used for monitoring are fit for purpose.

There are a number of different sampling methodologies that can be used by the Internal Quality Assurer when undertaking their approach to internal quality assurance.

- Horizontal sampling Sampling something from several or all units or learning outcomes from one learner.
- Vertical sampling Sampling one unit or learning outcome across Assessors or assessment locations..
- **Diagonal sampling** Sampling across units and Learners/Assessors to get a broader picture of the overall quality of the assessment judgements being made across a cohort or qualification.
- Thematic sampling Sampling based on a particular assessment activity.
- **Risk sampling** Sampling based on actual or perceived risks to the assessment process.

A typical IQA strategy will include the following:

- Which assessments methods will be used, this will often go beyond just written assignments and include the assessment of;
  - work-based evidence,
  - the assessment of other product evidence, for example; project proposals, briefing papers, reports, personal/professional development plans, reflective logs, portfolios etc.
  - the assessment of presentations, blogs, metaverse activities, participation in simulation activities,
  - professional discussions
  - observations
  - witness testimonies
- The strategy will also consider if these methods are **robust**, **safe**, **valid**, **fair** and **reliable** and how the methods will be monitored in the IQA processes. Will monitoring take the form of sampling assessed Learner's work and the associated assessment documentation, or is there a requirement to observe Assessors during assessment practice? It is useful to include the type of assessment that will be sampled in the sampling plan, for example, an observation or professional discussion may require the IQA to observe the assessment judgements.
- Who the Assessors and IQAs are, their experience, their workload, and which qualifications they will be involved with? More experienced Assessors can be monitored less frequently than new Assessors. A percentage of sampling is usually agreed upon, which might be 15%, 50% or 80 100% depending on the experience of the Assessor and other risk factors. It is good practice to use a RAG rating for assessors as follows:
  - $\circ \quad \text{Assessor Rated } \textbf{Green} \textbf{up to 15\%}$
  - Assessor Rated Amber up to 50%
  - $\circ$  Assessor Rated Red 85% 100%
- Do Assessors need to make adaptations to assessment methods for Learners with special requirements, and if so, what will these be? (remember, you will need to gain permission from your CMI Quality Manager to change the assessment methods)
- An outline of the documentation Assessors and IQAs will use, where records of decisions will be kept, ensuring adherence with CMI requirements and GDPR.
- How often team meetings, standardisation activities and training sessions will take place and who is expected to attend?
- All other risk factors that will have an influence on the monitoring of assessment practice.

## 5.8 IQA Risk Factors

Below are some examples of risks, this is not an exhaustive list

- Assessor-related risks a lack of confidence or experience in making assessment decisions, under or over-assessing by Assessors, Assessors not keeping CPD up to date, using leading questions in professional discussions or observations, incorrect assessment methods being used, poor feedback to Learners, speed and pace of assessments, incorrect or misunderstood assessment criteria, time pressures and targets, the use of unreliable evidence for example, witness testimonies.
- Learner-related risks Learners' lack of confidence or resistance to being assessed, Learners' needs not being taken into consideration, plagiarism or collusion, incorrect or misunderstood assessment criteria, time pressures and targets.
- **Centre-related risks** Moderation report recommendations not being acted upon, lack of or poor standardisation activities at the centre, leading to differences in assessment practice, unsuitable environment for assessment, changes to qualifications, standards, documents, procedures and

policies - centre needs to ensure all of these are communicated across the IQA and assessment team, high staff turnover leading to frequent changes of assessor and inconsistency in practice, problem units or ACs identified in IQA process.

As the person responsible for the quality of assessment, Internal Quality Assurers need to actively manage the performance of their team. This means monitoring what they do as individuals and giving them feedback where necessary. There are two reasons for this:

- Monitoring performance is a way to ensure the assessment decision is applied consistently and is a fundamental part of the quality assurance process.
- Giving feedback on performance is part of developing and supporting a team. Appraising performance on a regular basis and giving positive and negative feedback will enable the Internal Quality Assurer/IQA and Assessors to pinpoint areas for improvement. As a result, the Internal Quality Assurer/IQA will be able to formulate and agree on development plans with Assessors.

Once the risks have been identified, robust IQA sampling plans and tracking sheets can be put in place.

Below is an example of a Sampling Plan, however, Centres are encouraged to develop their own sampling plan bespoke to their Centres.

	EXAMPLE - IQA Sampling Plan and Tracking Sheet				
Centre: XYZ	Centre: XYZ Training Ltd				
<b>Qualification:</b> CMI Level 5 Certificate in Management and Leadership (5C30)		<b>Assessor:</b> Peter Smith <b>RAG Status:</b> Green	<b>IQA:</b> Robert Jones	<b>Sampling period:</b> Jan-Dec 2023	
Learner & Location	Unit - 501	Unit - 502	Unit - 525	Unit - 526	
<b>P012345</b> <b>R White</b> X Company	<b>Planned:</b> Feb 2023 <b>Actual:</b> 20/02/2023 Observation	Not Sampled	<b>Planned:</b> June 2023 <b>Actual:</b> 03/06/2023 Assignment	Not Sampled	
<b>P023456</b> <b>P Green</b> X Company	Not Sampled	<b>Planned:</b> May 2023 <b>Actual:</b> 21/05/2023 Product (work based) evidence	Not Sampled	<b>Planned:</b> June 2023 <b>Actual:</b> TBC Assignment	
<b>P034569</b> J Pink Y Company	Not Sampled	<b>Planned:</b> November 2023 <b>Actual:</b> TBC Assignment	<b>Planned:</b> June 2023 <b>Actual:</b> TBC Product (work based) evidence	Not Sampled	
P056789 S Orange Y Company	<b>Planned:</b> Jan 2023 <b>Actual:</b> 28/01/2023 Assignment	Not Sampled	Not Sampled	<b>Planned:</b> August 2023 <b>Actual:</b> TBC Observation	

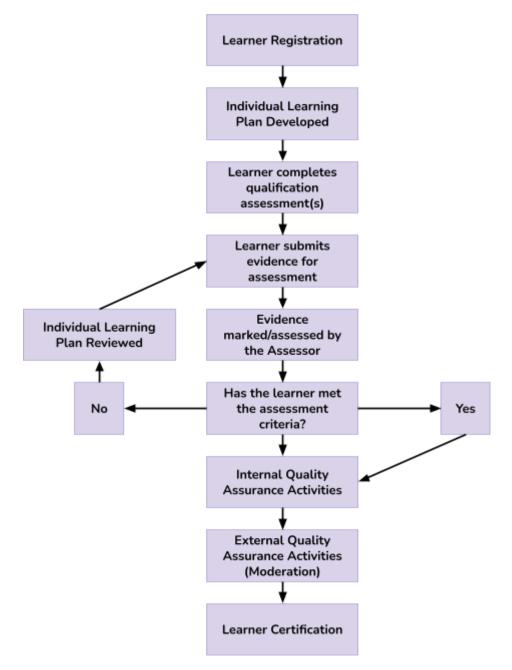


Figure 2 - Assessment and Quality Assurance Process

## 5.10 Internal Quality Assurer Responsibilities

The Internal Quality Assurer works with the Assessor in the following ways:

- Guiding and supporting the Assessors
- Monitoring and assessing Assessors' development
- Conducting formative and summative quality assurance
- Conducting standardisation meetings
- Answering queries relating to the assessment and quality assurance process
- Supporting Assessors in all ways such as special consideration and simulations
- Meeting CMI requirements
- Ensuring the CMI Centre policies and procedures are adhered to and are monitored and evaluated on a regular basis
- Storing and recording completed assessment for the quality assurance process

## 5.11 Internal Quality Assurer Management of Assessor Performance

As the person responsible for the quality of assessment, Internal Quality Assurer need to actively manage the performance of their team. This means monitoring what they do as individuals and giving them feedback where necessary.

There are two reasons for this:

- Monitoring performance is a way to ensure the assessment decision is applied consistently and is a fundamental part of the quality assurance process.
- Giving feedback on performance is part of developing and supporting a team. Appraising performance on a regular basis and giving positive and negative feedback will enable the Internal Quality Assurer and Assessors to pinpoint areas for improvement. As a result, the Internal Quality Assurer will be able to formulate and agree on development plans with Assessors.

#### 5.12 Effective Internal Quality Assurer Feedback

Internal Quality Assurer feedback given to Assessors should follow the same principles as Assessors giving feedback to the Learners on their performance. Here are some things to keep in mind:

- Don't just think about giving feedback, encourage the Assessors to ask questions and give you feedback too. Think of it as a two-way process, a partnership where the Internal Quality Assurer has a common goal of improving the overall quality of assessment
- Remember to include positive feedback. Identifying and sharing areas of good practice is important and you should give credit where it is due
- Let the Assessor take the lead in identifying areas for development. Ask them to tell you about
  - o What they feel are their strengths and weakness when it comes to assessment
  - o Any areas where they experience difficulties
  - o Anything they are particularly pleased about or they feel they have done especially well
- Use any observations of performance as the basis for giving feedback. Stick to the facts, what you saw them do particularly when delivering negative feedback
- Keep records of all contacts with the Assessors

#### 5.13 Identifying Inconsistencies

Here are some questions to ask when quality assuring assessments:

- Was the assessment planned in detail with the Learner, so as to maximise their chances of success?
- Has the Assessor made the judgement based on enough evidence to meet the assessment criteria?
- Has the Assessor made the best use of the assessment methods available?
- Has the Assessor used the right assessment methods?
- Does the way in which the evidence has been presented make it easy to find and understand?
- Can I be sure that the evidence has been produced by the Learner and only by them?
- Is this a safe judgement on the Assessor's part?
- Has the Assessor used 'VACSR' to ensure the assignment is:
  - Valid Covers all relevant content and sets out to confirm Learners' understanding.
  - Authentic verifies it is the Learner's own work and checks cognitive understanding is sufficient.
  - **C**urrent Is the content relevant or up to date
  - o **S**ufficient assessment must be fit for Learner, learning and level
  - $\circ~~\mathbf{R}$  eliable the assessment is replicable and consistent

You should aim to answer 'yes' to all the above questions. If your answer is 'no' to any of them, this will alert you to possible areas of inconsistencies and the need for further action on your part.

### 5.14 Managing Communication in the Centre

As the Internal Quality Assurer, part of your role involves managing communications, both with the Assessors and with the Quality Manager/Auditor. Here are some pointers to help you communicate effectively with all those in the assessment and quality assurance process.

Managing communication is about	This means
Gaining the support of senior management and keeping them informed of Centre practices and procedures.	• Formally reporting on any changes or modifications needed with regard to roles and responsibilities.
Making sure the Assessors and the management team understand all CMI and Centre policies and procedures, and their implications.	• Setting out a formal policy for internal quality assurance, including reporting arrangements and your sampling strategy.
Ensuring the Assessors understand their duties to uphold fair assessment policies and practices and what they can do if they have a query or a grievance.	<ul> <li>Telling Assessors about your policies and procedures at induction.</li> </ul>
Keeping in touch with Assessors.	<ul> <li>Making time to review with Assessors.</li> <li>Evaluating Assessor satisfaction.</li> <li>Devising an effective sampling strategy.</li> </ul>
Maintaining effective communication with CMI.	<ul> <li>Notifying CMI of any changes to your Centre structure, Staffing and resources.</li> <li>Keeping records of all communication with CMI.</li> </ul>

#### 5.15 Documentation

When selecting the monitoring sample, the Internal Quality Assurer must be aware of safety, confidentiality, security and any additional organisational requirements which could be affected by their presence. Any issues should be discussed with Assessors before arranging to monitor them.

The quality and accuracy of assessment plans (review and feedback) as well as Assessor records should be included in the review. The Internal Quality Assurer should observe the individual Assessor's assessment and interpersonal skills, with a view to noting any areas which would benefit from advice or further development.

The Internal Quality Assurer must also note any problematic areas (for example,. within the qualification) which could create difficulties for other Assessors. The Internal Quality Assurer should keep a record of this and ensure that it forms part of the Assessor's individual development plan.

#### 5.16 Regular Team Meetings

A standard agenda template should be produced to ensure:

- Standardisation is reviewed for each CMI programme
- New Staff are informed/trained on relevant CMI processes
- Regular updates from CMI are shared with teams
- Attendance at any relevant CMI events, such as webinars etc. are encouraged

- Assessment and IQA schedules are discussed to ensure the programme adheres to the planned schedule
- Any quality reviews such as QM visit reports or moderation reports are shared with the team
- Annual QA cycle includes feedback from Learners and the programme reviews identify any areas for improvement. These should then be used to inform future planning and delivery of programmes. This process should be recorded
- Meetings have recorded minutes which can be viewed by a Quality Manager/Auditor during a visit
- Minutes show any actions needed, who is responsible, and clear deadlines, which are reviewed at the next meeting

#### 5.17 Standardisation

CMI conducts regular standardisation exercises with CMI quality team members, Moderators and Markers.

CMI considers it good practice for Centres to conduct regular standardisation exercises with Tutors/Assessors and Internal Quality Assurer Staff to ensure that all work at the Centre has been assessed to the same standard. If two or more Tutors/Assessors are involved in marking assessments, the Internal Quality Assurer is responsible for internal standardisation. The Internal Quality Assurer takes responsibility during standardisation for ensuring a single approach and standard is achieved. If there is a disagreement the Internal Quality Assurer will have the final say. In large Centres, there may be more than one Internal Quality Assurer - in this case, it is suggested that there is a Lead Internal Quality Assurer.

For standardisation purposes, common pieces of work must be selected and marked by all Assessors, and any differences between interpretation and marks awarded must be discussed and reconciled at an internal standardisation session in which all Assessors must participate.

The Internal Quality Assurer (IQA) must ensure that the training includes the use of reference and archive materials such as work from previous moderation as appropriate.

CMI and the Approved Centre must ensure the confidentiality of any real work that may be used for training or standardisation purposes. CMI Privacy Policy applies.

See: https://www.managers.org.uk/about-cmi/governance/policies/data-privacy

## **External Quality Assurance Methods of CMI Qualifications**

## Section 6 - External Quality Assurance Methods of CMI Qualifications

#### 6.1 CMI Moderation

CMI is committed to the provision of duty of care to its Learners and to ensure that moderation undertaken by CMI allows for effectively determining whether or not:

- The assessment remains fit for purpose
- The criteria against which Learners' performance is differentiated are being applied accurately and consistently by Assessors in different CMI Centres, regardless of the identity of the Assessor, Learners, or CMI Centre

Regulations require CMI to conduct a moderation exercise to maintain the integrity of the CMI qualifications.

Regulations also require CMI to:

- Ensure that any such moderation which it undertakes guarantees that it is able to make any necessary changes to a CMI Centre's marking of evidence generated by a Learner in an assessment
- Make such a change wherever it considers it necessary in order to ensure that the assessment remains fit for purpose or that the criteria against Learners' performance is differentiated and being applied accurately and consistently.

Moderation is another means by which CMI quality assures Centre assessment decisions. Each Quality Manager supervises and is supported by a team of Moderators, Markers and Lead Moderators. Each Moderator (or Marker where required) will be allocated to a Centre to ensure consistency of approach.

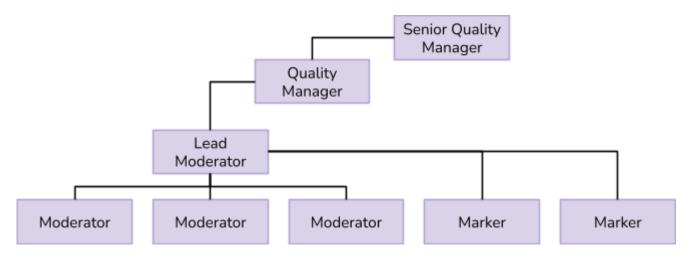


Figure 3 Example Organisation Chart

#### 6.2 Moderation Guidance and Submission Guidelines

CMI requires Centres to upload Learner assessments for moderation via the Moderation system located in MyCMI, CMI's online system. However, if the assessment is by portfolio, presentation, role play, or integrated work activities, this will require alternative arrangements. In this instance please contact your Quality Manager/Auditor.

Under exceptional circumstances, assignments can be posted to CMI for moderation. However, the Centre must ensure only copies are sent and not the original, and these should always be sent by recorded delivery.

Moderation may also take place by CMI Moderators accessing a Centre's virtual learning environment or other secure file-sharing systems. In this instance, it is advisable to ensure that IT access is sorted out well in advance of the moderation requirement. In addition to this, a Centre **must provide** an evidence locator document and administrative support in case problems are encountered.

CMI Centres should submit Learner's work to CMI for marking or moderation within a reasonable and practical timescale<sup>4</sup> of that work being submitted by the Learner to the Centre (and, where relevant, assessed and internally quality assured<sup>5</sup>);

## 6.3 What is Centre Assessment Standards Scrutiny (CASS)?

In February 2020, Ofqual introduced new Conditions that required awarding bodies to put in place Centre Assessment Standards Scrutiny (CASS) arrangements for all assessments where that awarding body allows assessment decisions to be made by Centres.

CASS refers to the arrangements CMI has in place with its Centres to check assessment decisions for Centre-marked assessments. It covers the type of checks that happen before results are issued, which are often referred to as Moderation, and those that happen on an ongoing basis and could happen before or after results are issued. It draws together other processes that support this, such as the way CMI decides which Centres can mark assessments on its behalf, how it monitors these, how it decides whether to scale its controls up or down and what action it might take if it discovers an issue with Centre marking.

There are many different types of qualifications and assessments, delivered by CMI across a variety of Centres. CMI has implemented the most appropriate strategy for the qualifications it delivers using a risk-based approach.

The Regulators expect CMI to consider a range of factors and to develop a strategy to manage the different risks that apply, to secure the standards of assessments that are marked by Centres.

#### 6.4 How did CMI decide on its CASS Approach?

For the majority of qualifications that include Centre-marked assessments, CMI considered and decided on an approach that fits the organisation and qualifications based on a range of factors. This incorporated a range of controls and involved both pre and post-results checks on Centre marking, as well as different forms of Centre monitoring, such as remote or face-to-face quality assurance visits and checks.

When planning the CMI CASS approach, a range of factors were considered. These included:

- whether the qualification is sessional or roll-on/roll-off
- the typical amount of time a Learner will take to complete the qualification
- the type of Learners who usually take the qualification
- the assessment model
- the number of components in the qualification and the number of these that are marked by a Centre
- the type of evidence generated by a Learner in assessments for the qualification
- the number of Learners taking the qualification

This enabled CMI to develop the CASS to help decide:

- the frequency and type of monitoring which CMI conducts
- the timing of the monitoring activities
- the number of components within a qualification that are sampled

<sup>&</sup>lt;sup>4</sup> For **Approved EPP Centres using CMI Moderation Service** this must be within 1-3 months of the Centres assessment and internal quality assurance process being undertaken.

For **Registered and Approved EPP Centres using CMI External Marking Service** this must be within 1-3 months of receiving the Learners completed assessment.

For **HE Dual Accredited Centres using CMI Moderation Service** this must be within 1-3 months of the Centres assessment and internal quality assurance process.

<sup>&</sup>lt;sup>5</sup> In addition this must be within 2 months before the qualification certification end date. These dates can be found within each of the qualification syllabus handbook - <u>https://www.managers.org.uk/education-and-learning/qualifications/</u>

- the period over which all components for a qualification are sampled
- the number of Learners sampled
- whether sampling activities take place before and/or after results are received by some or all Learners
- whether the activities will inform further changes to processes, require a reassessment of Learners who have not received results or revoke certificates that have already been issued.

#### 6.5 Moderation Fulfilment and Sampling Strategy

In line with CASS, Moderators will look at a representative sample of Learner work in order to assess the accuracy and consistency of the assessment decisions made by the Centre. To select a representative sample, the strategy will take into account different factors, which may impact the quality of the assessment. These factors are used to define a sampling strategy. The sampling strategy determines the size of the sample and enables value judgements to be made.

The basis of any quality sampling strategy will be based on a number of factors such as previous sampling (this should then indicate the size of the sample), Staff, Learner numbers, sanctions applied, referral rates, compliance and risk factors. If the Moderator finds the Centre's internal assessment and quality assurance process is not effective and/or performed with absolute integrity (for example submitting Learners whose work does not justify a pass), then the Moderator will increase the sample size.

Moderators will check the selected sample in several approaches:

- By checking the Centre-marked assessment for a selected Learner to ensure that the assessment is appropriate, consistent and complete.
- By checking specific assessment criteria/learning outcomes across a number of Learners and across a number of units to ensure that assessment is consistent for all Learners on any given qualification.

The level of sampling will depend on relevant risk factors associated with that Centre, built around predetermined sampling requirements. However, the level is flexible enough to allow changes and overrides in the sample to meet specific needs. This includes the ability for the Moderator, Lead Moderator, Quality Manager and the Awarding Body Team to increase/decrease the sample sizes as required. Any change in the sample size must be approved by the Quality Manager in the first instance.

This model will be based on a sampling strategy that focuses on the number of unit completions of certain qualifications that a Centre submits. Once this sample has been chosen (either manually or by the system), CMI will then request that the Centre upload the relevant work of the chosen sample and any associated assessment and internal quality assurance documents so a moderation sample can be taken. This means that CMI chooses the sample and informs the Centre, rather than the Centre providing CMI with their own chosen sample. The model allows CMI to choose the sample where a robust representative sampling strategy can be applied which takes into consideration the following:

- Learners A selection of Learners (not based based on gender, age or ethnicity)
- **Units** cross-sample of units from the qualification (where there is a large number of Learner submissions, the system should cover all the units within the qualifications so a full representation of units has been sampled)
- Learning outcomes and assessment criteria as appropriate the context in which the CMI qualification is delivered/assessed
- **Centre Assessors** assessment decisions made by a range of Centre Assessor(s), with different experience and qualifications, workload, occupational experience
- Centre Internal Quality Assurer units sampled by the Centre's IQA(s)
- Marker-to-Learner ratio (for example. If one Marker marked the majority of the units within a qualification, this should be reflected in the Learners in the sample)
- **Conflicts of Interest** any Learners where there is an associated Conflict of Interest/Personal Interest should be included
- **Range of assessment methods** used by the Centre Assignments, Questioning, Recognition of Prior Learning (RPL), Professional Discussion
- Satellite Centre (Important for international CMI Centres\*)
- Grades Selection of grades awarded when dual accreditation occurs (HE Partners)

\*Where a Centre has multiple international satellite Centre provisions, the moderation system will consider that there will be a requirement to include a sample from each of the satellite Centres as part of the sampling requirement. However, this sample can focus on one satellite per sample or alternatively sample from across satellite Centres.

For HE moderation the sampling strategy may include:

- Learners with compensated results
- Learners with RPL/APEL
- Learners that have been deferred or referred, to enable these Learners to be factored into the sampling size and captured in the moderation report. Therefore, once those Learners have been awarded all the modules mapped at an exam board, and the Centre has confirmed the result with the CMI moderator, claims can be raised in the CMI moderation system without the need for sampling.

The Quality Manager has the authority at any time to increase and/or decrease the moderation sample size/percentage required to be submitted by the Centre. An increase in moderation may be due to one or more of the below factors:

- The standard of assessment decisions within the CMI Centre does not meet CMI requirements
- The CMI Centre is submitting Learners' assessment onto a newly approved qualification for the first time
- A new Assessor or Internal Quality Assurer within a CMI Centre
- Conflict of Interest or Personal Interest
- Part of a CMI audit including malpractice or maladministration investigations
- Part of a Centre visit by a Quality Manager or Moderator
- Quality issues in teaching, learning and assessment
- Non-completion of actions against ongoing approval

A decrease in moderation may be due to one or more of the below factors:

- The standard of assessment decisions within the CMI Centre consistently meets CMI requirements for the programme;
- The volume of Learners submitted for moderation is very high in which case a reduced sampling plan may apply for logistical reasons;
- An international sampling plan applies across multiple satellites in which the main Centre is directly responsible for multiple satellites.

CMI's moderation sampling strategy, in line with the regulator's CASS requirements, ensures that moderation will take place continuously until a sufficient sampling amount has been reached within that quarter for any particular Centre. After a sufficient set amount of moderation has taken place known as 'Moderation Fulfilment', then the sampling will cease for that Centre until the next quarter (referred to as a 'helicopter' approach). Quarter periods are set to fall in line with the regulator's reporting periods, however, CMI can increase sampling based on risk.

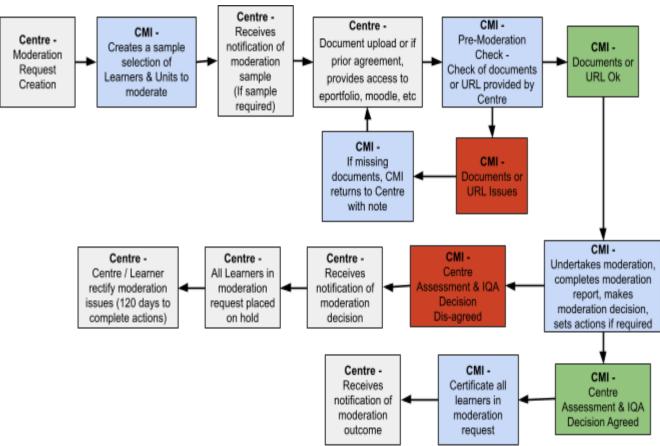
- Qtr 1 1 April 30 June
- Qtr 2 1 July 30 September
- Qtr 3 1 October 31 December
- Qtr 4 1 January 31 March

The system will review at the start of each quarter the Centre's current registration volume for each of the qualifications on the Centre's approved qualification remit. Depending on the risk rating of the particular qualification (Set by the Quality Manager) it will assign a sampling size of Learner assessments that it will require the Centre to submit for moderation during that period. After a sufficient set amount of moderation has taken place and Moderation Fulfilment has been achieved, then the sampling will cease for that Centre until the next quarter, however, the Centre can still claim for Learners. Where the moderation process identifies issues with the Learner(s) assessments, Centre's assessment or internal quality assurance process then the Quality Manager may increase the amount even if the determined sample amount has been reached within any given period.

#### 6.6 Stages of Moderation

The system is broken down into a number of key stages

- **Centre Claim Creation -** Centre creates a claim, System creates a sample selection based on a qualification risk algorithm associated with the qualification\*.
- **Moderator Review Sample Selection** Notification to the Moderator, review sample chosen, agree or override sample selection
- **Centre Document Upload or if agreed, provides access to e-portfolio, moodle, etc** Notification to the Centre requesting the sample evidence is upload to the system
- Moderator Notification to the Moderator that the Centre has uploaded evidence or provided URL
- **Moderator Pre Moderation Check** Moderator logs on to the system and reviews that they are able to open the documents and to check that that no documents are missing (No moderation at this stage)
- Moderator If missing documents, Moderator return to Centre with note
- Centre Missing Document Upload Centre upload missing documents
- Moderator Pre Moderation Check Notification to Moderator that missing document are ready
- **Moderator Moderation** Undertakes moderation, completes moderation report, makes moderation decision, sets actions if required
- **Centre** Moderation Report available if the moderator agrees with the Centre assessment and internal quality assurance decision.
- Lead Moderator & Quality Manager Reviews any return to Centre decisions
- Lead Moderator Agrees or overturns Moderators decisions, potential to select an additional sample
- Centre Completes any return to Centre moderation actions



#### 6.7 Process Flowchart

Figure 4 Moderation Process Flowchart

## 6.8 Sampling Size

The sampling strategy fits around all qualifications regardless of qualification type, subject, etc, so the algorithm is standardised across qualifications but changes depending on risk levels.

#### Learners/Units selected for CMI sampling but have not been IQA sampled by the Centre

CMI may select as part of the moderation process, Learners and units that have not gone through the Centre's own internal quality assurance process. Where a Learner/unit has been selected by CMI that has not gone through the Centre's own IQA process, then there is no requirement to provide IQA feedback sheets for that particular Learner/unit/assessment activity. However, evidence of an IQA sampling plan would be required to indicate what Learners and units, assessment activities are planned to be sampled or not be sampled, in line with the Centre IQA sampling strategy.

Where a Learner/unit/assessment activity has been sampled by the Centres IQA, then the appropriate IQA feedback sheet and sampling plan would be required to be submitted as part of the moderation process, to validate the IQA decision of the assessment activity.

**Low-Risk qualification sampling** - Sampling amount for all levels of qualifications regardless of qualification type, subject, etc, per quarter.

Total Unit Volume	Total Units required to be sampled during the Quarter Period			
Claimed for the Quarter	Award	Certificate	Diploma	Extended Diploma
1 - 100 Units	1 different unit x	2 different units x	3 different units x 3	4 different units x 3
	3 Learners	3 Learners	Learners	Learners
101 - 249	1 different unit x	2 different units x	3 different units x 4	4 different units x 4
Units	4 Learners	4 Learners	Learners	Learners
+ 250 Units	1 different unit x	2 different units x	3 different units x 5	4 different units x 5
	5 Learners	5 Learners	Learners	Learners

**Medium-Risk qualification sampling** - Sampling amount for all levels of qualifications regardless of qualification type, subject, etc, per quarter.

Total Unit	Total Units required to be sampled during the Quarter Period			
Volume Claimed for the Quarter	Award	Certificate	Diploma	Extended Diploma
1 - 100 Units	1 different unit x	2 different units x	3 different units x	4 different units x 6
	6 Learners	6 Learners	6 Learners	Learners
101 - 249	1 different unit x	2 different units x	3 different units x	4 different units x 8
Units	8 Learners	8 Learners	8 Learners	Learners
+ 250 Units	1 different unit x	2 different units x	3 different units x	4 different units x 10
	10 Learners	10 Learners	10 Learners	Learners

**High-Risk qualification sampling** - Sampling amount for all levels of qualifications regardless of qualification type, subject, etc, per quarter.

Total Unit Volume Claimed for the Quarter	Total Units required to be sampled during the Quarter Period			
	Award	Certificate	Diploma	Extended Diploma
1 - 100 Units	All units from all Learners			
101 - 249 Units				
+ 250 Units				

#### 6.9 Moderators Feedback

#### Approved Centres

The Moderators will give feedback to the Centre, on the Assessor decisions, IQA processes and decisions, assignment briefs and the Learner work. The Moderator will only sign off Learner results for certification if all assessment decisions meet CMI standards. The Quality Manager has sight of all Centre documentation and Moderator feedback. Some CMI Centres will choose to send in one unit per qualification for the CMI External Assessment team to mark as a quality stamp of approval. The Centre can then use this as a basis to standardise their internal marking on this unit.

### 6.10 Registered Centres

CMI Markers are responsible for marking Learners' assignments that are sent to CMI for external assessment. This can occur when a Centre does not have an Assessor and/or Internal Quality Assurer infrastructure within the Centre. These are marked by CMI Associates in marking roles and then moderated by the Deputy Lead Moderators.

#### 6.11 Moderation Requests Returned to Centre

Where a Learner's submission for moderation has not met the required criteria, for example, the assessment criteria has not been met in their assessment or alternatively it may have been returned to Centre as documents/evidence are missing, the Moderator will make a referral and it will then go back to the Centre with feedback for resubmission.

Once the Centre has received the referral they should review the feedback form given by the Moderator. The Centre should support the Learner with any necessary changes required, and this should then go through the Centre's internal assessment and quality assurance process before resubmission.

Where the Moderator feedback has identified that the Centre is missing/incomplete documents for example. assignment brief, IQA report etc, will have to be resubmitted.

Once these actions are completed the Centre should then upload the 2<sup>nd</sup> Learner submission and any missing documents/information that have been requested by the Moderator onto the returned request. These must be uploaded to the relevant place. The moderation system guidance states where documents should be uploaded to for example. IQA feedback and assignment briefs are uploaded to the supporting documents tab and the Learner(s) assignment(s) and mark sheets are under the relevant Learner and unit.

Once the Centre has added all the relevant documents/information the request should be re-submitted. This process is the same as the Centre would have previously gone through when uploading the request. When the request has been resubmitted, it gets sent back to the Moderator to review.

## 6.12 How to Submit a Resubmission Assignment

Where Centres are submitting assignments for different units, they **must** be clearly labelled in the file naming convention as a resubmission.

- The files should be uploaded containing the following:
  - o All Learners' assignments (if they are all the same qualification and unit)
  - o The referred marksheet
  - o Learner Statement of Authenticity (for each Learner)

Each Learner's file **must** be titled 'Resubmission' and include the Learner's name, Learner's 'P' number and the unit code of the assignment.

All edited work by the Learner **must** be in a different colour to the original text as to clearly show what has changed from the original submission. The first submission should be in BLACK, the second submission in BLUE and the third (final) submission in RED.

## Appendix 1 - Glossary

Accreditation	The process through which the Qualifications Regulators confirm that a qualification conforms to the requirements of the RQF regulatory arrangements (NB – previously QCF).
Appeal	The process through which an Awarding Organisation may be challenged on the outcome of an enquiry about results or, where appropriate, other procedural decisions affecting a Centre or an individual Learner.
Assessor	A person who undertakes marking or the review of marking. This involves using a particular set of criteria to make judgements as to the level of attainment a Learner has demonstrated in an assessment.
Assessment	The process through which evidence of Learners' attainments is evaluated against agreed criteria to provide the evidence for a qualification.
Assessment criteria	Descriptions of the requirements a Learner is expected to meet to demonstrate that a learning outcome has been achieved.
Assessment standard	The standard that a Learner is expected to reach in order to achieve credit for a unit, expressed through a combination of the learning outcomes and assessment criteria of that unit.
Authentication	A process under which evidence generated by a Learner in an assessment is confirmed as having been generated by the Learner (or identified and confirmed as being that Learner's contribution to group work) and as being generated under required conditions.
Award	A qualification with credit value between 1 and 12.
Awarding Body	Awarding Body means an organisation recognised by a national regulatory body ie Ofqual, Qualifications Wales, CCEA Regulation & SQA Accreditation in respect of the General/Standard Conditions of Recognition/Regulatory Principles and award or authentication of a specified qualification, or description of qualification.
CASS	Centre Assessment Standards Scrutiny means the activities by which the Awarding Body (in this case CMI) quality assures the practice by which it delegates assessment judgements to Approved Centres.
CCEA Regulation	The Northern Ireland qualifications agency
CPD	Continuing Professional Development.
CV	Curriculum Vitae.
CMI Centre	An organisation to undertake the delivery and assessment to Learners on behalf of CMI. Centres are typically educational institutions, training providers, or employers.
Characteristic	Age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, and sexual orientation in England and age, disability, marital status, racial group, religious belief, sex, sexual orientation, political opinion
Comparability of assessment	The extent to which assessment outcomes are equivalent between Centres, units and qualifications, and over time.

Conditions of Recognition	All conditions to which an Awarding Organisation's recognition is subject (including other conditions imposed under section 132(3)(d) of the Act).
Credit	An award made to a Learner in recognition of the achievement of the designated learning outcomes of a unit.
Credit transfer	The process of using a credit or credits awarded in the context of one qualification towards the achievement requirements of another qualification.
Credit value	The number of credits that may be awarded to a Learner for the successful achievement of the learning outcomes of a unit.
Certificate	A record of attainment of credit or a qualification issued by an awarding organisation.
Certificate	A qualification with a credit value between 13 and 36.
Diploma	A qualification with a credit value of 37 or above.
Data Protection Law	Data Protection Legislation means the UK Data Protection Act 2018 and the General Data Protection Regulation (Regulation (EU) 2016/679) as enacted into English law ('the GDPR') as revised and superseded from time to time; and the terms 'data subject", 'personal data', 'data controller' and 'data processor' when used in this Agreement shall have the meanings given in the Data Protection Legislation.
Equalities Law	The Equality Act 2010. Any Act that was a statutory predecessor to that Act, or any legislation in a jurisdiction other than England which has an equivalent purpose and effect.
Exemption	The facility for a Learner to claim exemption from some of the achievement requirements of an RQF qualification, using evidence of certificated, non-RQF achievement deemed to be of equivalent value.
External Assessment	A service CMI offers to mark Learner assignments.
FE	Further Education.
Guided learning hours	Guided Learning Hours (GLH) has traditionally meant the number of hours of education or training under the immediate guidance or supervision of a Lecturer, Supervisor, Tutor, Skills Coach or Employer.
	With the increasing use of IT to improve the learning environment, facilitate the practical application of knowledge and make learning flexible to Learners outside of normal working hours and across different time zones, what constitutes 'immediate supervision' and indeed the value of immediacy is now in question. Participating in education and training now embraces many new and innovative forms which include synchronous and asynchronous methods. For this reason, CMI now considers immediate and non-immediate guidance or supervision as an acceptable practice in calculating GLH for CMI qualifications.
HE	Higher Education.
HUB	CMI online system for CMI Centres to register Learners, to sign off results for Learners, and Centre Approval.
IC	Institute of Consulting.
IIP	Investors in People.
IQA	Internal Quality Assurer.
Learner	Individuals registered for a CMI qualification.
Level	An indication of the relative demand, complexity and/or depth of achievement, and/or the autonomy of the Learner in demonstrating that achievement.

Malpractice	The deliberate or willful contravention or ignoring of the regulatory requirements of the QCF by an organisation recognised to operate within the framework.
Mandatory units	Units in a set of rules of combination that must be achieved for the qualification to be awarded.
Moderation	The process through which the marking of assessments by CMI Centres is monitored to make sure it meets required standards and through which adjustments to results are made, where required, to ensure that results are based on the required standard. This includes quality assurance.
Multi Centre	A Centre that has a location that is separate from the registered Centre Centre (same name and same organisation), where existing Centre Staff delivers and assesses Learners.
NVQ	National Vocational Qualification.
National Occupational Standards (NOS)	Describe what a person needs to do, know and understand in a job to carry out the role in a consistent and competent way.
Optional unit	A unit named in a set of rules of combination that a Learner may choose to complete to achieve the required number of units/credits for award of the qualification.
Pathway	A route to the achievement of a qualification that requires a combination of credits to be achieved from particular units and is identified by an endorsement to a qualification title.
Qualification	An award made to a Learner for the achievement of the specified combination of credits, or credits and exemptions, required for that award.
Qualification level	An indication of the relative demand, complexity and/or depth of achievement, and/or the autonomy of the Learner, represented by a qualification.
Qualification purpose	A means of identifying qualifications with a set of shared characteristics.
Qualification title	A short description of the level, size and content of the qualification.
Reasonable Adjustments	Reasonable Adjustment is an adjustment of the delivery and/or assessment of a CMI qualification in order to alleviate or remove the effects of a substantial disadvantage for a Learner.
Recognition of Prior Learning (RPL)	A method of assessment that considers whether a Learner can demonstrate that they can meet the assessment requirements for a unit through knowledge, understanding or skills they already possess and do not need to develop through a course of learning.
Register	The register is published and maintained by Ofqual in accordance with section 148 of the Act.
Rule of Combination	A rule specifying the combination of units which may be taken to form a particular qualification, any units which must be taken and any related requirements.
Regulatory Body	Accredits Awarding Bodies and ensures the quality of the overall qualifications system with Awarding Bodies.
Regulatory Principles	SQA Accreditation's Regulatory Principles are intended for use by existing organisations to ensure ongoing compliance, new organisations seeking approval as an awarding body, awarding bodies seeking accreditation of qualifications and providers delivering SQA-accredited qualifications
RQF	qualifications.

	Regulatory Qualification Framework
Satellite Centre	A Centre remote from the prime Centre that involves a third party. NB – Multisite Centres international are classed as Satellite Centres.
SCQF	Scottish Credit and Qualifications Framework.
SQA Accreditation	Scottish Qualifications Authority.
SSB	Standard Setting Body - an organisation (usually a national training organisation) recognised by a regulatory authority as a responsible Body which has written the national standards of competence for an employment sector and is keeping them under review.
SVQ	Scottish Vocational Qualification.
Special Consideration	Special consideration is a temporary experience that prevents the Learner from taking an assessment or prevents them from being able to demonstrate his or her level of attainment in an assessment.
тит	Total Unit Time (TUT) is defined as the number of notional hours which represents an estimate of the total amount of time that could reasonably be expected to be required, in order for a Learner to achieve and demonstrate the achievement of the level of attainment necessary for the award of a unit.
тдт	Total Qualification Time - As defined under General Condition J1.8, Total Qualification Time is the number of notional hours which represents an estimate of the total amount of time that could reasonably be expected to be required in order for a Learner to achieve and demonstrate the achievement of the level of attainment necessary for the award of a qualification.
Unit	Total Qualification Time is comprised of the following two elements: (a) the number of hours which an awarding organisation has assigned to a qualification for Guided Learning, and (b) an estimate of the number of hours a Learner will reasonably be likely to spend in preparation, study or any other form of participation in education or training, including assessment, which takes place as directed by – but, unlike Guided Learning, not under the Immediate Guidance or Supervision of – a Lecturer, Supervisor, Tutor or other appropriate providers of education or training. The smallest part of a qualification that can be separately certificated.
VQ	Vocational Qualification.

## **Command Verbs Definitions List**

## **Appendix 2 - Command Verbs Definitions List**

The aim of this table is to give a definition of the command verbs used in the CMI qualifications, to guide both Learners and Centres. Some words can be used at different levels of our qualifications but as you move up the levels, the depth and breadth of answers/responses required increases.

Command Verb	Definition
Analyse	Break the subject or complex situation(s) into separate parts and examine each part in detail; identify the main issues and show how the main ideas are related to practice and why they are important. Reference to current research or theory may support the analysis.
Appraise	Assess, estimate the worth, value, quality, performance. Consider carefully to form an opinion.
Articulate	Express or clearly state your understanding of the topic.
Assess	Provide a reasoned judgement or rationale of the standard, quality, value or importance of something, informed by relevant facts/rationale.
Comment	Identify and write about the main issues, express an opinion, giving reaction to what has been read/observed.
Compare	Review the subject(s) in detail – looking at similarities and differences.
Conceptualise	Create a diagram, model, chart or graphic with annotations, providing a holistic overview of the process.
Conduct	Organise and perform a particular activity
Construct	To create or build something original
Consider	Take (something) into account (i.e. different ideas, perspectives, theories, evidence) when making a judgement
Create	Originate or produce a solution to a problem.
Critically appraise	A systematic process used to identify the strengths and weaknesses of information in order to assess the usefulness and validity.
Critically assess	As with assess, but emphasising on judgments made about arguments by others, and about what is being assessed from a different perspective. Making a reasoned argument, based on judgments.
Critically analyse	As with analysis, but questioning and testing the strength of a person and/or others' analyses from different perspectives. Using the process of analysis to make an objective and reasoned argument.
Critically discuss	As with discuss, but evaluating the pros and cons of the subject in hand critically. Discussing all the aspects and dimensions of the topic in hand. Discussing the effects and impacts of the topic.
Critically evaluate	As with evaluate, but considering the strengths and weaknesses, arguments for and against and/or similarities and differences. The writer should then judge the evidence from the different perspectives and make a valid conclusion or reasoned judgement. Apply current

	research or theories to support the evaluation when applicable.
	Critical evaluation not only considers the evidence above but also the strength of the evidence based on the validity of the method of evidence compilation.
Critically reflect	As with reflect, but identifying, questioning, and assessing deeply-held beliefs and assumptions about a topic, the way in which we perceive events and issues, beliefs, feelings, and actions.
Critically	Typically used to qualify verbs such as evaluate, assess, appraise, analyse and reflect. Give in-depth insight, opinion, debate, verdict based on a wide variety of sources, theory, research which may agree and contradict an argument.
Critique	A detailed analysis and assessment of something, especially a literary, philosophical, or political theory.
Define	Show or state clearly and accurately.
Describe	Provide an extended range of detailed factual information about the topic or item in a logical way.
Demonstrate	Complete a task or activity, showing an understanding of facts, procedures and ideas of a topic.
Determine	Settle/conclude an argument/question as a result of investigation or by referring to an authority.
Develop	Elaborate, expand or progress an idea from a starting point building upon given information.
Differentiate	Recognise or ascertain a difference to identify what makes something different.
Discuss	Give a detailed account including a range of views or opinions, which include contrasting perspectives.
Distinguish	Draw or make distinction between
Draw	Present a conclusion or decision about what is likely to happen based on facts.
Establish	Discover, prove or show something to be true or valid by determining the facts.
Evaluate	Consider the strengths and weaknesses, arguments for and against and/or similarities and differences. The writer should then judge the evidence from the different perspectives and make a valid conclusion or reasoned judgement. Apply current research or theories to support the evaluation when applicable.
Examine	Inspect (something) thoroughly in order to determine its nature or condition.
Explain	Make something clear to someone by describing or revealing relevant information in more detail.
Formulate	To devise or develop an idea or concept in a concise and systematic way.
Identify	Ascertain the origin, nature or definitive characteristics of something.
Interpet	To clarify/explain the meaning of something
Investigate	Carry out a systematic or formal inquiry to discover and examine the facts of (problem, options, incident, allegation etc) so as to establish the truth.
Justify	Provide a rationale for actions and/or decisions. Your rationale should be underpinned by

	research, academic theory, data analysis or experience.
Outline	A general description/broad account/summary of something showing essential features/outline the case briefly but not the detail.
Plan	A detailed outline providing an insight into a range of activities required to complete a task.
Prepare	To make or develop something ready which will happen in the future
Present	To present to an audience of stakeholders the outcomes of a Learner's studies/findings
Produce	To make, create or form something. Put together, assemble. leads to an outcome / result.
Profile	An outline giving a description of a role or organisation
Recommend	Put forward proposals, an alternative or suggestion(s) supported by a clear rationale appropriate to the situation/context.
Reflect	Consciously contemplate, appraise or give balanced consideration to an action or issue.
Report	A structured document communicated or presented in an oral or written form and organised in a narrative, graphic or tabular form referring to a specific period, event or topic area. It is recommended that all CMI assessment criteria for this task are clearly addressed within the narrative or main body, conclusion and recommendations sections of a report.
Research	A detailed study or investigation of a subject in order to establish facts and reach new conclusions.
Review	To examine, survey, reconsider a subject, theory or item.
Specify	Identify or state a fact or requirement clearly and precisely in detail.
Summarise	Sum up or give a brief account of relevant information in your own words.
Use	The action of using something for a particular purpose.

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