



CMI Direct Claims Policy – Ref: AB/POL/0021/Aug19V03

History

Date	Version	Change	Owner
	1	Introduction	JD
Jul 18	2	Criteria introduced	JD (SQM)
Aug 19	3	Changes to Intro; Scope; responsibilities of the Programme Director; Principles; Conditions of Confidence; Withdrawal; Appeals	EP, NE, RW

Purpose

This policy sets out CMI's approach to Direct Claims Status to eligible Approved Centres.

Introduction

Chartered Management Institute (CMI) is currently running a pilot on Direct Claims Status and it has chosen to use its Strategic Partners to test the service. The Pilot was initially run for a 12 month period and was reviewed in July 19. A decision has been made to extend this controlled pilot in light of regulatory changes on the horizon; the momentum behind flexible assessment and known IT challenges of working in this way utilising partner systems. This policy will be reviewed again in 2020.

Regulatory Requirements

H2.1 Where evidence generated by a Learner in an assessment for a qualification made available by an awarding organisation is marked by a Centre, the awarding organisation must have in place clear and effective arrangements to undertake Moderation of the assessment.

H2.2 An awarding organisation must ensure that any such Moderation which it undertakes allows it effectively to determine whether or not –

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

H2.3 An awarding organisation must –

- (a) ensure that any such Moderation which it undertakes ensures that it is able to make any necessary changes to a Centre's marking of evidence generated by a Learner in an assessment, and

(b) 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 which Learners' performance is differentiated are being applied accurately and consistently.

Scope

This guidance applies to all Chartered Management Institute (CMI) approved Centres that have been awarded Direct Claims Status and are taking place in CMI Direct Claims pilot. This document aims to support and give clarification to Centres on their responsibilities and CMI's to ensure that CMI qualifications are being awarded correctly.

Definition of Direct Claims Status (DCS)

Direct Claim Status (DCS) is a method widely used by awarding organisations, allowing eligible Centres to claim for Learners' certificates when they are ready and are satisfied their Learners have fully met the qualification conditions of confidence, without the need for CMI moderation prior to the certificate being issued.

Roles and Responsibilities

Programme Director

- The Centre Programme Director by giving permission to sign off Learners on the Hub is confirming that all Learners requested for certification have fully met the assessment requirements for the units being claimed in accordance with the qualification syllabus and CMI assessment requirements.
- The Centre Programme Director is to ensure that where an Assessor or IQA are unable to fulfil their duties, either due to leaving the organisation or via absence that a replacement is found immediately and a staff approval request is made to the Quality Manager prior to them performing their role.
- The Centre Programme Director is to ensure that full access is granted for CMI Moderators to Learner work on demand or at a predefined time window after completion of units that are claimed.
- The Centre Programme Director is to ensure that archived Learner data is accessible to CMI staff for up to 3 years after the Learner completes their programme.

Centre Internal Assessors and IQA team

- Ensure that consistent robust delivery, assessment and internal quality assurance systems and procedures are maintained.
- Any new Centre Assessors are firstly approved by the CMI Quality Manager prior to assessing CMI Learners.
- Any changes to the Assessment team are reported to the CMI Quality Manager prior to assessing CMI Learners.
- Take the lead in ensuring that assessment and internal quality assurance is well planned and meets CMI requirements.
- Ensure the appointed Assessors have confirmed that all Learners requested for certification have fully met the assessment requirements for the units being claimed in accordance with the qualification syllabus.
- Confirms the claim for certification is correct.
- Understands that claims made incorrectly could be considered maladministration and or malpractice and will be investigated in accordance of CMI Malpractice and Maladministration Policy and Procedure.

CMI Awarding Body Team

- Make recommendation for DCS in accordance with this policy.
- Continue to monitor on a regular basis the ongoing compliance of the Centre that standards are being maintained.
- Moderation and Marking Team need to alert the Quality Manager of concerns with the Centre activity which may lead to the suspension and/or withdrawal of DCS.

General Principles of Direct Claims Status

DCS is Programme and not Centre specific.

A Centre with DCS is perceived by CMI as a low risk Centre and has appropriate occupational competent, skilled and knowledgeable internal quality assurance team and reliable, robust internal quality assurance systems in place. These aspects enable the Centre to make consistent, accurate decisions about certificates awarded to Learners.

DCS is built on demonstrated trust and confidence, based on the Centre ensuring it continues to operate to the consistent high standards identified as already in place.

Based on evidence of consistent robust internal quality assurance systems CMI may recommend DCS. Confirmation of DCS, and the final decision, is at CMI's discretion.

Where DCS has been approved by the Quality Manager or Head of Awarding Body, Centres must continue to deliver the qualification to Learners, assess the work and make sure it is internally quality assured. If a Centre is granted DCS, the Centre's Internal Assurance processes will be able to approve the certificate claims for those qualifications without waiting for the need for final sign off by CMI moderation and Quality Assurance team.

DCS is awarded on an individual qualification by qualification basis, not across the Centre as a whole. A Centre may hold DCS for more than one qualification at a time, as long as all the conditions of confidence are met in full for each qualification.

Centres will continue to receive CMI moderation for the qualifications they do not have DCS approval for.

Twice yearly meetings (minimum) will take with the Centre's Quality Manager for standardisation purposes.

To retain DCS, Centres must keep all evidence and retain all associated records of assessment and internal quality assurance activity, for all qualification/units for which DCS has been granted. This is so that CMI can review a sample of completed Learners work that has been directly certificated, as part of the Centres ongoing compliance monitoring against the Centre Partnership Agreement.

Claims will be summarised by the CMI Quality Auditor on a monthly basis and the CMI Moderator will be informed. The CMI Moderator, having full access to the Learner work, will sample based on a pre-defined sampling plan which will be based on the number of Learners and modules claimed for the DCS programme.

For fewer than 20 Learners per month a sample size of 15% across all Learners and units will be applied. For 21+ Learners per month a reduced sample size may apply at the Quality Manager's discretion. A sample size of 50% and 100% can also be applied until the Quality Manager has confidence to reduce the level down. The Moderator can also increase the sample size if problems are found.

Direct Claims Status Approval - Conditions of Confidence

During the Direct Claims pilot the DCS approval process includes the provision of seven conditions of confidence to evaluate the Centre's risk level and their potential in being awarded DCS.

DCS cannot be transferred from one Awarding Organisation to another it must be approved.

DCS can only be approved by the Centre's Quality Manager.

The ten conditions of Confidence that must be met before DCS is approved are as follows:-

1. The Centre must have an CMI approved Internal Verifier.
2. The Quality Manager and their assessment team have seen enough evidence that the internal quality assurance team are awarding CMI qualifications in a consistent manner. The Centre must not have had a claim disagreed in the last 12 months.
3. **The Centre must have had at least two successful Centre Visits and all actions must be completed**
4. If the Centre was approved by the FastTrack process full documentation must now be in place
5. The Centre's internal quality assurance policy and procedure is being effectively implemented and covers all aspects of the internal quality assurance
6. The Centre has no sanctions in place
7. The Centre has a low risk status
8. The CMI Moderator/Lead Moderator has visited the Centre to meet administration staff/tutors. The visit can be virtual.
9. The CMI Moderator has proven and reliable access to Learner work where it resides on the Centre's e-portfolio or VLE.
10. The Centre must ensure that all live Learner data is available to the CMI Moderator within an agreed window of the Learner completing their programme and that arrangements are in place to allow retrieval of such data from archiving systems for a period of 3 years.

CMI will also take into account if the Centre also has DCS issued by another Awarding Organisation.

CMI will inform the Centre in writing when their DCS is confirmed, clearly stating for which qualification(s) the DCS has been approved and the terms and conditions of DCS. If there are any conditions attached to the DCS approval, those will also be stated at this time. The Centre must sign and return a copy of the approval letter to confirm their agreement, committing them to following the terms and conditions under which DCS has been awarded.

The Centre must advise CMI **immediately** of any changes that may affect the Centre's DCS approval, for example, changes to resources, particularly within the assessment and IQA team.

Making a Direct Claim

Direct claims are made online via the Hub. Please refer to CMI Direct Claims Guide for full instructions. Certificates will then be printed in line with our service level agreement. All evidence and records must be kept in line with our CMI Retention of Records Policy.

Direct Claims Status Withdrawal

To ensure the integrity of the delivery, assessment and quality assurance of a qualification, CMI will withdraw DCS where the Centre no longer meets the criteria for eligibility.

CMI adopts a risk based approach and DCS may be suspended and or withdrawn upon the recommendation of the Quality Manager if they report concerns about the quality of work being carried out during the monitoring/moderation activities, and in particular, about the internal quality assurance processes in place.

Centres that have DCS and incur actions at sanction Level 1 (an Action Plan) will not necessarily have their DCS removed for that qualification, where all actions are satisfactory completed within the set timescales specified by the Quality Manager in the Centre Visit Report.

Centres that have DCS and incur a sanctions at level 2 or above, will have their DCS promptly removed for those qualifications that are under concern.

DCS will be withdrawn where the Centre stops delivering the qualification(s) or does not make direct certification claims for the qualification(s) for 12 months.

DCS will be automatically suspended where a malpractice or maladministration is alleged whilst an investigation is in progress.

DCS will be withdrawn if the regulator (Ofqual) restricts the use of DCS with conditions that conflict with the aforementioned conditions.

Appeals

Centres who wish to appeal against a decision regarding withdrawal of DCS or any other sanctions imposed should do so using CMI Appeals Policy and Procedure..