
6 Policies to support programme design, delivery and assessment

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6.1 Data protection

This policy applies to ILM approved centres and recognised providers.

Some definitions

Under the Data Protection Act, 1998 (the “Act”):

- ‘Personal Data’ means all information that may identify a living individual, including any expressions of opinion about the individual
- ‘Sensitive Personal Data’ means information on a living individual’s racial or ethnic origin, political opinions, religious beliefs, physical or mental health, sexual life, trade union membership or criminal convictions, or proceedings relating to any criminal charges against that individual
- ‘processing’ means obtaining, recording or holding the information or data, or carrying out any operation or set of operations on the information or data including organising, adapting, altering, retrieving, disclosing, destroying or using the information or data
- ‘Data Subjects’ are the people who may give personal information to centres about themselves.

6.1.1 The data we collect, and why

In the course of dealings with ILM, we may need you to provide us with personal data in relation to:

- your employees and other staff members
- any contractors or agents your centre uses
- your registered learners.

We also need some:

- ‘Sensitive personal data’ about learners, to register and certificate them and to meet our obligations for monitoring equal opportunities
- information on learners’ email and home address, for ILM studying membership.

In addition, regulatory bodies require us to provide detailed information to measure success against agreed objectives. We may need to disclose some of the data we collect from you to those regulatory bodies.

6.1.2 Your legal responsibilities as a centre

The Act and/or the Privacy and Electronic Communications (EC Directive)

Regulations 2003 require you as a centre to:

- make sure that your Data Subjects know what you do with the personal information they give you, when you collect their Personal Data
- allow Data Subjects to prevent you from using their Personal Data for direct marketing, usually by having them tick a box on the data protection notice if they wish to opt out of this type of marketing
- have received the intended recipient’s clear consent before you can arrange to send them marketing material by email
- obtain Data Subjects’ consent before collecting Sensitive Personal Data.

As these are legal obligations we expect and assume that you will:

- obtain explicit consent for processing Sensitive Personal Data where appropriate
- provide the opt-out for direct marketing to Data Subjects
- provide the opt-in for direct marketing by email.

We may ask for confirmation and/or evidence of these relevant opt outs/ins.

6.1.3 The importance of a data protection notice

To ensure that you comply with your legal requirements when you are collecting data from data subjects, you must produce a data protection notice, so that data subjects are aware of what will be done with the personal information they give.

There is an example on the last page of this section of the policy.

Please review it with caution, and where necessary take advice before finalising your data protection notices. Please remember:

- it is an example only, that you may be able to use as the basis for your own notice(s)
- it is your responsibility to ensure that the notices you use are always accurate, and comply with any relevant data protection laws.

6.1.4 Processing personal and sensitive data

You must make it clear to your learners and staff that ILM, City & Guilds and its agents may use or otherwise process Personal Data and Sensitive Personal Data, so we can:

In relation to centres:

- fulfil our contractual responsibilities to centres, and enable centres to fulfil their contractual obligations to learners
- provide centres with details of our products and services.

In relation to a centre's employees:

- contact them directly in relation to ILM centre approval and/or our quality assurance activities, and/or to inform them of products or services that we, City & Guilds and/or selected third parties are offering
- place Personal Data relating to certain key employees and agents in directories that may be made publicly available.

In relation to learners:

- contact them directly by email or post about studying membership, ILM centre approval and/or our quality assurance activities, and/or to inform them of products or services that we, City & Guilds and/or selected third parties offer
- carry out statistical analysis – either ourselves or by third parties on our behalf
- give regulatory and industry bodies appropriate Personal Data or Sensitive Personal Data about learners where there is a contractual or legal requirement – specifically to:
 - ensure they can monitor equal opportunities in ethnicity and disability, or for other monitor such monitoring purposes

- account for learners where there is a requirement to do so
- allow them to meet the requirement to contact a learner directly, when the information is not readily accessible from another source
- pass learners' Personal Data to regulatory and industry bodies or other selected third parties, solely for the purpose of providing prizes, remuneration and awards for learners.

We may have to transfer the Personal Data outside the European Economic Area (EEA) and if we do, ILM and City & Guilds make every reasonable effort to ensure that any data we transfer receives the same protection as if it would within the EEA.

6.1.5 Maintaining and retaining accurate records

The Act requires you as a centre to ensure that the Personal Data and Sensitive Personal Data you hold is accurate and up to date.

So you should update your records regularly – at least once a quarter – and let us know straightaway if:

- there is any change or correction to any Personal Data or Sensitive Personal Data that you previously disclosed to ILM
- you delete or otherwise archive any Personal Data or Sensitive Personal Data for a Data Subject whose records you have already sent to ILM
- a Data Subject exercises their right to opt out of or refuse processing

The centre is responsible to ILM for any loss we may suffer as a result of a centre's failure to comply with the Act, or any of the obligations set out in this policy.

Data Protection Notice *[Sample only]*

We, *[centre name]*, are required to comply with the provisions of the Data Protection Act 1998 (the Act) in relation to how we handle any personal data we obtain from you. Any personal information we gather will only be used in the context of *[your employment with us OR the business we conduct with you]*. We may also collect Sensitive Personal Data about you, but only with your explicit consent in advance.

We may process all the information we obtain from you to enable us to fulfil our contractual obligations to you and we may request further information from third parties or disclose your details to other selected third parties, such as ILM, City & Guilds or their regulators or industry bodies.

We may from time to time email or post to you *[or your company]* details of products or courses we believe may be of interest to you. If you no longer require such information or you have provided us with any information that you no longer wish us to use, please call us on *[telephone number]*.

In disclosing your personal details to us, you agree that we may process and in particular may disclose your Personal Data:

- as required by law to any third parties
- to selected third parties who may process Personal Data on our behalf
- to third parties such as ILM who may use your personal data or sensitive personal data (as appropriate) to:
 - enable us to fulfil our contractual obligations to you – for example by providing you with an examination certificate;
 - contact you directly about events, courses, programmes, or ILM membership
 - carry out statistical analysis
 - pass to their regulator or industry bodies to (1) monitor equal opportunities relating to ethnicity or disability, or for other such monitoring purposes or to (2) account for learners where there is a requirement to do so, or to (3) meet their requirement to contact you directly and the information is not readily accessible from any other source
 - disclose and publish your details in directories which may contain information about the *[centre]* and
 - provide or arrange prizes, remuneration and awards
 - contact you about your ILM studying membership.
- If we pass your Personal Data to ILM it:
 - may transfer your Personal Data outside the European Economic Area (EEA) and if they do they will make every reasonable effort to ensure that any transferred data receives the same protection as if it would within the EEA
 - undertakes that it and its staff will take every reasonable step possible to protect the confidentiality and security of all material it receives, to carry out its various responsibilities.
- You have the right to have us correct any inadequacies in the personal details we hold about you, and to object to any direct marketing we carry out using your personal details. You also have the right to ask for a copy of the information we hold in our records, in return for a small fee of not more than £10. Please contact us at *[contact details]* if you want a copy of the personal data we hold about you

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6.2 Complaints, appeals and malpractice

This policy applies to ILM approved centres and recognised providers.

6.2.1 Your internal appeals procedure

One of the conditions of approval and re-approval is that you must:

- at all times encourage ILM learners and their sponsors to discuss delivery, assessment and administrative issues informally first, to try and resolve any problems or queries at the earliest possible opportunity
- must have a sound internal appeals procedure, in case a problem, disagreement, dispute or complaint cannot be resolved informally.

The starting point is that everyone should know exactly what to expect. So to make everything clear from the start, give every learner written details of the:

- content and format of the programme
- delivery methods you intend to use
- assessment system, including feedback arrangements
- assessment criteria
- support available, including arrangements for reasonable adjustments and special consideration
- centre's internal appeals procedure
- appeals procedure against ILM assessment (Section 6.2.2) where ILM assesses the programme's key components.

The features of a sound procedure

Your internal appeals procedure must state very clearly:

- the stages in the procedure
- exactly who – or which position in the centre – the person wanting to appeal should refer their issue to
- what form the appeal should be in – for example, letter or pro-forma
- any time limits for lodging an appeal, and the timescale for the centre to respond (generally given in 'working days')
- the objective and independent process the centre will use to respond to the appeal – possibly an appeals panel, consideration by a named individual, or some other appropriate alternative
- any support or representation the appellant may bring to the appeal
- how the centre notifies the appellant of the outcome
- the written records and evidence the centre keeps, and for how long.

Our involvement in your internal appeals procedure

External Verifiers and Quality Managers/Quality Consultants will give you general guidance, but they don't normally become involved in specific appeals that are still going through the centre's internal procedure.

In the rare event that the External Verifier or Quality Manager/Quality Consultant does become involved you may have to pay an additional fee, along with any associated travel and other expenses. We would always discuss this with you beforehand and the fee would depend on the level of our involvement.

Escalation to ILM

If a learner, their representative or their sponsor is still dissatisfied with something in the centre's delivery or assessment of ILM programmes, we will consider it – but only when the centre's internal appeal procedure has been exhausted.

That said, there are some issues we will not investigate – essentially anything:

- submitted to us more than 30 working days after the date on which the centre notified the learner of the result of their internal procedure
- that took place before ILM received the learner's registration
- that is or should be dealt with under an employer's disciplinary or grievance procedures
- involving another awarding organisation
- involving points of law.

What we do, step by step

So if a learner and/or sponsor is still dissatisfied, the centre's internal procedure has been exhausted and it is not an excluded issue, they can refer the matter to ILM. We do not charge for our involvement.

The appellant must send the full details of the action they are dissatisfied with, with their name and address, centre details and copies of any relevant evidence, in writing to the Head of Quality & Administration at ILM, 1 Giltspur Street, London EC1A 9DD

When we receive the appeal or complaint we:

- acknowledge receipt in writing to you and to the appellant within five working days
- check that the learner was registered with ILM at the time of the disputed action or failure to act
- check that the centre's internal appeals procedure has been exhausted
- request a copy of the centre's full file on the appeal, to be sent to ILM within 10 working days.

During this time the Head of Quality & Administration nominates an appropriate member of ILM staff as an adjudicator to review the appeal or complaint. Where necessary that adjudicator:

- can get technical advice from a Quality/Business Manager and/or External Verifier/Quality Consultant who is not attached to the centre that's involved
- may decide to ask for extra evidence from anyone associated with the appeal.

Within 30 working days of us receiving the appeals file (or extra evidence, if that was later), the Head of Quality & Administration writes to the appellant and the centre with

the outcome of their investigation. If they consider the appeal or complaint is justified, the notification sets out any remedial action.

If the appellant is dissatisfied with the way the procedure was handled – not the decision itself – a final appeal may be possible. See section 6.2.4 below.

6.2.2 Appealing against an ILM assessment decision

The steps in an appeal

Where ILM assesses key components of a programme, a learner has the right to appeal against an ILM External Assessor's or Lead Assessor's assessment decision.

If they do:

- the centre must make the appeal on their behalf
- the appeal must be made within 21 working days of the centre receiving the assessment decision
- it must be in writing (email or letter), addressed to the Assessment & Qualifications Executive, ILM, 1 Giltspur Street, London EC1A 9DD, and come with:
 1. the materials that were the basis of the assessment
 2. the centre's records of how the assessment result was reached
 3. the current re-assessment fee (see ILM fees list on www.i-l-m.com)

When we receive the appeal we:

- acknowledge it within 5 working days, in writing to the centre
- check the centre's approved status, and the learner's registration
- pass the original piece of work to another Lead Assessor, for reassessment.

When the reassessment is done we write to the centre with the outcome of the appeal, within 30 working days of having received it.

If this decision confirms the original assessment, we will refund the re-assessment fee.

If the appellant is dissatisfied with the way the procedure was handled – not the decision itself – a final appeal may be possible. For the details, see section 6.2.4 on final appeals below.

6.2.3 If you have a complaint about ILM

There may be times when you feel that we have treated your centre unfairly, or done something in the wrong way, or done something we shouldn't have done, or not done something we should.

In that case we will investigate, except for anything:

- that happened more than 30 working days before the matter is raised
- involving another awarding organisation

- involving points of law
- that is or should be dealt with under an employer's disciplinary or grievance procedures.

What to do if you have a complaint

Most complaints are resolved quickly and informally, through discussion. So in the first instance you should discuss the matter with your Quality Manager or Business Manager – unless your complaint is about them, in which case you should contact the Head of Quality Practice or the Director of Business Development. Your Customer Service Co-ordinator will give you the contact details.

As a matter of good practice we keep records of these initial discussions, and we strongly recommend that you do too.

If informal discussion doesn't resolve the matter and you decide to raise a formal complaint, the head of your centre should write to the Head of Quality & Administration at ILM, 1 Giltspur Street, London EC1A 9DD, with full details. For us to consider the complaint we do have to receive it within 30 working days of the act (or failure to act) you are raising.

The Head of Quality & Administration nominates an appropriate member of ILM staff to investigate and adjudicate on the complaint. Where necessary that adjudicator:

- can get technical advice from a Quality/Business Manager and/or External Verifier/Quality Consultant from a region or nation other than the one for the centre that's involved
- may decide to ask for extra evidence from anyone associated with the complaint, including the records of the initial discussions..

Within 30 working days of receiving the complaint, the Head of Quality & Administration writes to the centre with the result of their investigation. If they consider the complaint is justified the notification sets out any remedial action.

There is, of course, no charge for our investigations.

6.2.4 The final appeal stage

Further appeals against the process

A further appeal is possible, if the appellant or complainant is dissatisfied with the way the procedure was handled – not the decision itself. There is no further appeal against a decision that's already been taken by this stage.

A further appeal goes to the Head of Quality & Administration at ILM, 1 Giltspur Street, London EC1A 9DD, who refers it to the ILM Advisory Council. The Council members are independent of ILM operations and report the details of all final appeals to the City & Guilds group Appeals Board.

We have to receive the appeal within 10 working days of the centre receiving our decision, or we cannot consider it. There may be a fee to cover administration costs.

The result of this appeal is final.

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6.2.5 Querying a Qualification Quality Rating

As a centre, you may raise a query if you have an issue with a Qualification Quality Rating.

You must raise the query by phone or email with your Quality Manager or the ILM Quality, Audit & Compliance Manager, within two working days of the External Verifier setting the rating.

The Quality Manager or the Quality, Audit & Compliance Manager will review the evidence and the External Verifier's rationale for recommending the Qualification Quality Rating, and discuss it with your centre within a further five working days.

If it's impossible to reach an agreement, the centre may escalate the query to an appeal, in writing to the Head of Quality & Administration at ILM, 1 Giltspur Street, London EC1A 9DD

They will then identify an independent representative to review the Qualification Quality Rating.

6.2.6 Dealing with irregularities and malpractice

Irregularities

Irregularities are situations where the centre's operations do not meet the requirements set out in this *Centre Manual* and the relevant *Qualification Specifications*.

Monitoring centre activities is a normal element in any awarding organisation's operations. Our External Verifiers, Quality Managers and Quality Consultants not only support centres, they also constantly check that they meet all the relevant requirements.

The normal route is to use the quality assurance system to report on and initiate remedial action within centres – normally through the Action Plan, which spells the improvements or changes needed, by when and by whom. With this in place the External Verifier can follow up the specifics of the required improvements and ensure compliance.

Malpractice

For our purposes malpractice is defined as:

immoral, illegal or unethical professional conduct or neglect of professional duty on the part of learners, centre staff or anyone else involved in providing a qualification, if it risks adversely affecting the integrity of ILM qualifications.

We have clear procedures for dealing with alleged malpractice.

1. If you suspect malpractice after learners have been registered, you must report it in writing to the Head of Quality & Administration within 5 working days of discovering it. Any centre that knowingly fails to disclose, or delays disclosure of such information, risks its approval being suspended or withdrawn. (Section 6.8)

2. If an ILM representative suspects any malpractice within a centre they must report it in writing to the Head of Quality & Administration, within 5 working days.
3. If we receive a report of malpractice the Head of Quality & Administration acts straightaway, appointing technically competent personnel to investigate. The investigators compile detailed reports and evidence and ILM takes appropriate remedial action – agreed with the regulatory authorities in significant cases.
4. We maintain records of all cases of malpractice and are required to:
 - immediately and automatically report all significant cases of malpractice to the regulatory authorities
 - report on all cases, if requested by the regulatory authorities
 - co-operate fully with any follow-up investigations that the regulatory authorities ask for or carry out
 - share relevant information with other awarding organisations and/or other agencies such as funding bodies
 - immediately and automatically report evidence of an invalid certificate to the regulatory authorities, and agree the appropriate action and the timescale.

6.3 *Our bilingual policy, for Welsh and other languages*

This policy applies to approved centres.

The Welsh Language

Polisi dwyieithrwydd

Mae Deddf yr Iaith Gymraeg 1993 wedi sefydlu'r egwyddor y dylai Saesneg a Chymraeg gael eu trin yn gyfartal ym mywyd cyhoeddus Cymru.

Mae ILM yn cefnogi'r egwyddor hon yn llawn ac yn adnabod a nodi cynlluniau allweddol sydd ar waith yng Nghymru. Mae deunyddiau asesu ar gael yn y ddwy iaith. Mae gennym cynllun strategol cyfredol i gyflwyno darpariaeth pellach pan mae anghenion ychwanegol yn cael eu hadnabod. Credwn fod darpariaeth ddwyieithog yn golygu mwy na chynhyrchu deunyddiau ysgrifenedig ac rydym wedi ymrwymo i gefnogi'r strategaethau dwyieithog sydd wrthi'n cael eu datblygu gan ein canolfannau Cymreig.

Ac yntau'n gorff dyfarnu, mae ILM wedi creu systemau, prosesau ac ymarfer fel bod asesu a dilysu'n gallu digwydd trwy gyfrwng y Gymraeg.

Bilingual Policy

The Welsh Language Act 1993 established the principle that in the conduct of public business in Wales, the English and Welsh languages should be treated on a basis of equality.

ILM fully supports this initiative and has identified key schemes operating in Wales, and made bilingual assessment materials available. There is a plan to introduce further provision as additional needs are identified. Bilingual provision goes beyond the production of written materials, and we are committed to supporting the bi-lingual strategies that our Welsh centres are currently developing.

ILM as an awarding organisation has established systems, processes and practice to enable assessment and verification to be conducted in the medium of Welsh.

Other languages

Within the rules of the QCF, ILM qualifications may be taught and assessed in languages other than English, Welsh and Gaeilge. This is approached on a case by case basis, and must be agreed in advance with the ILM Quality Manager. The decision will be made on the basis of whether ILM quality assurance processes can be operated to the same high standard as those applied to qualifications taught and assessed in English (and Welsh/Gaeilge).

Any ILM learner assessed in a language other than English, Welsh or Gaeilge will have this clearly stated on their QCF qualification certificate.

Translating certificates

ILM certificates are in English. If you need them translated into Welsh please contact the Customer Service Team on 01543 266867.

The translation of open or distance learning materials

Copyright in open or distance learning materials produced in partnership between ILM and various publishers may not belong to ILM alone. This includes ILM Super Series 5.

Please refer any enquiries and proposals on the translation of these materials to the Qualifications and Learning Solutions Team. They will liaise with the relevant publisher and their email address is qualifications@i-l-m.com

6.4 Cheating and plagiarism

This policy applies to approved centres and recognised providers.

6.4.1 The scope of the policy

This policy covers all ILM learners registered on qualifications and endorsed programmes. By definition it does not apply to development programmes, as they include no assessment.

The learner is accountable to you, the centre. Your responsibility to ILM is to take reasonable measures to prevent your learners from resorting to plagiarism. To this end your centre must formulate its own plagiarism policy, using these guidelines.

The External Verifier may ask to see a centre's records of all cases of proven plagiarism as part of the Annual Centre Review.

We maintain records of all notified cases of plagiarism for monitoring and audit purposes.

6.4.2 A few definitions

Plagiarism is when a learner presents or passes off someone else's work as their own. It could include:

- presenting the whole or parts of published or unpublished works as their own, without giving credit to the source by using an approved academic referencing convention
- paraphrasing the writings or ideas of another, without giving credit to the source by using an approved academic referencing convention
- copying the work of another past or present learner.

Minor plagiarism is when a substantial part of the assessment (more than 20%) is not the learner's own work, AND/OR when the learner may have inadvertently forgotten to acknowledge a source correctly.

Major plagiarism is when a substantial part of the assessment (more than 20%) is not the learner's own work AND/OR the learner is believed to have wilfully failed to acknowledge sources.

6.4.3 Preventing plagiarism

As part of your centre's responsibility for preventing plagiarism you must explain to learners:

- what plagiarism is
- how you deal with it
- the correct way to acknowledge someone else's work, using an approved academic convention.

The advice on acknowledging sources on the next page explains what learners should do. It's there for you to copy and hand out, if you need a simple guide.

Acknowledging sources

In ILM Management Reports or Consultancy Reports, please use a bibliography to list the sources of ideas and any resources you used to prepare your work. You'll find plenty of advice on preparing a bibliography on the Internet, or your tutor can help.

If you want to use quotations in Mini-projects, Projects, Work-based Assignments or similar assessments you can add a simple footnote, or acknowledge the source in a set of brackets within the text.

Where possible, avoid quoting word-for-word extracts from other sources such as textbooks, websites, academic papers, newspapers and journals.

If you do use actual quotations though, here are some guidelines:

- You may include brief quotations (up to 25 words or so) within your narrative, normally in inverted commas. If you use longer quotations make it absolutely clear that it is a quotation – perhaps with a different typeface, by indenting or with italics.

You must show the source in your bibliography for Management or Consultancy Reports, or in a footnote or in brackets within the text.

- Do not over-use quotations, or use very long quotations – ask your tutor if you are in any doubt at all. If you use more of another person's copyright work than is fair in the circumstances and/or without their permission, you may infringe their legal rights.
- There are different ways to write a bibliography, but whichever you choose use it consistently. One of the best way to acknowledge sources is the simple name/date Harvard system, and this is a simple format for referring to a book.

Hill, Peter, *Concepts of Coaching: a guide for managers* (London: ILM, 2004)

The order is:

- author's surname [comma] author's first name (or initials) [comma]
- book title in italics, no comma
- publication details in brackets - place of publication then a colon, then the publisher's name and a comma, and finally the date.

End of guidance for learners

6.4.4 Your internal plagiarism policy

Your own plagiarism policy must include details of:

- how you inform learners about what plagiarism is, and how you deal with it
- the person responsible for dealing with incidents of plagiarism in the centre – including keeping the suspected learner updated with progress, and informing them of the final ruling, and explaining their right to appeal
- the actions/stages in the internal investigation if plagiarism is suspected, including the point at which the learner is told of the suspicion/investigation
- when to report an incident to the External Verifier (who then decides who else to inform) and the form the report should be in – letter, pro-forma, etc
- the timescale for completing an investigation
- how to document and record the final ruling, and prepare a copy for the learner
- the record-keeping arrangements for all instances of suspected and/or proven plagiarism
- the sanctions for minor plagiarism – for example the learner may be requested to redo all or some of an assessment, and then if the subsequent work is of an acceptable standard, may be awarded the minimum pass mark for that assessment component
- the fact that learners who commit, or are suspected of committing, acts of major plagiarism **MUST** be reported to ILM through the External Verifier.

6.4.5 Major plagiarism reported to the ILM External Verifier

When you inform the External Verifier of suspected or proven major plagiarism, s/he records this on their centre file and sends copies to the Quality Manager and the Head of Quality & Administration

We then launch an investigation, run by a member of ILM staff whose skill and knowledge is appropriate to the circumstances. During the investigation you must co-operate fully, to help protect the integrity of the qualification(s).

If it's proved that the learner committed a major act of plagiarism, we discuss the situation with all the relevant parties and may decide to withhold certification, or provide only unit certification in the case of full-length qualifications.

6.4.6 If the External Verifier suspects plagiarism

If the External Verifier suspects that a learner has committed an act of plagiarism, s/he takes this up straightaway with the member of staff responsible for handling plagiarism at the centre, and reports the outcome to their local Quality Manager.

If that person disagrees with the External Verifier's suspicions the Quality Manager works with both parties towards a resolution. If there is no resolution the matter will be referred to the Head of Quality & Administration, whose decision is final.

6.4.7 If an ILM External Assessor suspects plagiarism

If an ILM External Assessor suspects that a learner has committed an act of plagiarism, s/he refers the matter to the appropriate Lead Assessor, who takes it up with the centre through the Chief Assessor and informs the External Verifier and Quality Manager.

6.4.8 How we deal with plagiarism

In a case of minor plagiarism we may require the learner to redo all or some of an assessment, and then if the subsequent work is of an acceptable standard we may decide to award the minimum pass mark for that assessment component.

If it's proved that the learner committed a major act of plagiarism, we discuss the situation with all the relevant parties and may decide to withhold certification, or provide only unit certification in the case of full-length qualifications.

6.5 Equal Opportunities

6.5.1 Our commitment, and yours

ILM is dedicated to improving the quality and practice of management and leadership in organisations, wherever it operates.

We understand that organisations operate within their own cultures and legal systems. However, we seek to promote genuine equality of opportunity – not only equal opportunity for all learners and potential learners, but also effective equal opportunities practice by centres and holders of our qualifications in their daily work.

We are committed to equal opportunities for all, regardless of gender, marital status, age, physical status or any disability, racial or ethnic origin, nationality, creed or religious belief, sexual orientation, age or employment status.

We have our own internal *Equal Opportunities Policy Statement* and do everything possible to ensure that no discrimination occurs during any of our procedures and processes, whether it is approval, re-approval, external assessment or external verification. We make all our staff and contractors aware of this policy and encourage them to undertake awareness training where appropriate.

We require all our approved centres and recognised providers to be committed to equality of opportunity.

Regulatory bodies also require approved centres to comply with the equal opportunities requirements of the *Statutory Regulation of External Qualifications, 2006*, the *NVQ Code of Practice and the Regulatory Arrangements for the Qualifications and Credit Framework, 2008*. Our monitoring of centres' equal opportunities practices is to ensure that they meet all these requirements.

The rest of this section applies to approved centres.

6.5.2 What we require of all Approved Centres

One of our (re)approval conditions is that your centre adopts, implements and monitors an equal opportunities policy. It must be a sound and solid overarching policy that meets the requirement of national cultural and disability legislation, and the requirements of the regulatory authorities.

The specific policy naturally complements your other human resource policies, but it must follow ILM guidance on how it covers equal opportunities. It should extend beyond reference to equality in employment and internal matters, and cover activities in relation to your learners, and clients (where relevant).

Following approval, Quality Managers and External Verifiers check that your equal opportunities policy runs through all the internal procedures relating to the recruitment, preparation and assessment of learners for an ILM qualification.

6.5.3 A framework for a sound policy

The following paragraphs give some guidance on the issues that you must cover in your policy. It is guidance though, and is not intended to be legally accurate nor does it constitute legal advice.

Distribution

In this section of the policy you must describe the arrangements for disseminating the policy throughout the organisation, and to learners, clients and associates involved with ILM programmes.

Promotion

(External for college/private training organisations, internal for in-company providers)
This should cover the wording and placing of advertisements, including non-English versions where appropriate, and any arrangements to reach groups that are historically under-represented on management programmes.

Entrance requirements

This section sets out your policy in relation to:

- standards of literacy (written and oral) and numeracy
- any previous experience required
- arrangements to support those who might have some difficulties with the programme of learning and assessment.

Enrolment and registration

This must include:

- provision for collecting the equal opportunities information required for registering learners with ILM, and
- an opportunity for (prospective) learners to notify or preferably discuss any special requirements for any:
 - support they may need, so they can participate in the programme
 - reasonable adjustments necessary to ensure access to fair assessment.

Induction

Equal opportunities issues must be covered in induction, supported by written information on your policies and backed up with details of what happens if a grievance arises. Induction should also include details of the centre's various support mechanisms – for example any crèche facilities, literacy/numeracy support, ESL provision, induction loops for the hearing impaired, and so on.

We suggest that you get written confirmation that learners have received the information, and understand it.

The programme

In this part of the policy you must detail how the centre handles equal opportunities issues in its learning delivery, both face-to-face and in learning support material. The detail might include a wide range of examples of how you avoid gender and racial stereotyping, together with evidence of monitoring delivery and materials over a period of time. It might also include details on how you meet the special needs of hearing and sight-impaired learners.

Assessment

There must be a statement confirming that assessment is entirely related to performance and in no way influenced by gender, age, race or disability. It should also make clear your commitment to fair assessment, detailing the arrangements available for learners with particular assessment requirements, without compromising the integrity of the assessment.

Remember that you must get ILM's written agreement to all requests for reasonable adjustments, as soon as possible in the programme and always before they are implemented.

Centre facilities

This may include access to buildings, provision of lifts where appropriate, toilet facilities, canteen arrangements, learning and learning support facilities, parking, induction loops and so on.

Complaints procedures

This should detail what learners should do if they have any cause for concern on equal opportunities issues, whether at recruitment, during the programme, with assessment processes or any other time. It must contain guidance on sexual and racial harassment issues, and bullying.

Staff development

You must outline the awareness training available for staff where necessary, and the pattern of any updates at appropriate intervals.

Action plan

This is where you set out the actions being taken (and planned) to ensure equality of opportunity in all the aspects listed above. It should show clearly who is responsible for taking these actions, and record positive actions.

Internal monitoring arrangements

This must describe the systems for collecting data on registrations, achievements and so on, and outline the comparison with relevant centre, regional and national data. Please remember that you must always follow data protection laws and regulations (Section 6.1)

6.5.4 How we monitor your approach to equal opportunities

At (re)approval every centre has to provide evidence of its commitment to equal opportunities. The External Verifier then monitors the implementation of the organisation's equal opportunities policy, in their routine visits.

They look for proof that you are actively pursuing an equal opportunities policy, and some of the possible evidence may include:

- a policy statement setting out your commitment to equal opportunities and anti-discrimination
- examples of how the policy is disseminated to staff, contractors, agents and learners
- how your commitment to equal opportunities and anti-discrimination is implemented in delivery and assessment
- information on how the policy relates specifically to the delivery of ILM qualifications and awards
- guidance on how to identify those who may be vulnerable to discrimination within the centre – for instance during programme delivery or assessment
- guidance on how to identify those who may be vulnerable externally – for example at a work placement, when collecting evidence or being assessed
- guidance to colleagues on what constitutes or could constitute anti-racist and anti-discriminatory practice in the delivery of ILM qualifications and awards
- guidance on how the organisation promotes this practice in the interests of learners registered for the qualifications and awards
- a list of staff with a clearly-defined responsibility and an agreed time allocation, for overseeing the implementation of the policy
- details of how the centre ensures appropriate access to buildings, facilities, learning, learning support and assessment
- agenda and meeting notes dealing routinely with equal opportunities issues
- details of the mechanisms for dealing with discriminatory practice within the organisation
- guidance on the mechanisms for regularly reviewing and revising the policy
- records and record-keeping practices relating to the equal opportunities policy and its implementation, including any complaints or appeals.

6.6 Reasonable adjustments or special consideration

This policy applies to ILM approved centres only.

6.6.1 The background

Reasonable adjustments and special consideration remove barriers that would otherwise disadvantage learners with special needs or in special circumstances. So they level the playing field – they do not give the learner in question any advantage over other learners.

Our aim is to provide the same access to assessment for all learners, including those who need reasonable adjustments or special considerations. So although we do not change the standards or criteria for an S/NVQ or VRQ, we do take a positive approach to flexible and responsive assessment strategies and methods.

There's no list that defines what merits reasonable adjustments or special consideration. Some learners may need help because, for example, they're hearing or visually impaired, or in hospital and in need of special arrangements for their assessment. Some may merit extra time on an assessment because of learning difficulties. Others may have practical difficulties, – for instance someone who doesn't currently have the necessary level of responsibility may find it hard to evidence management or leadership skills, and anyone not in paid employment could certainly have a problem.

6.6.2 Getting approval for your learners

Whatever the reason, you must get approval to adjust the assessment situation, before the event. Your External Verifier can agree minor adjustments and considerations. You must record all agreements in writing.

For more significant reasonable adjustments or special considerations you must obtain specific agreement from ILM, though. The application form is at the end of this section and it's there for you to copy and use.

When you send it in:

- the Administration Manager looks at requests for learners on an S/NVQ or an internally-assessed VRQ
- the Assessment & Qualifications Executive considers requests for learners registered on a qualification with ILM-assessed components.

6.6.3 With ILM-assessed components

When you email work for ILM external assessment, you must also attach information about any approved adjustments or considerations you have had approved:

- for minor adjustments and considerations it's enough to include a simple covering letter or email from the centre and/or EV, with the learner's work
- for significant arrangements that warrant the use of the application form, you must attach a copy of the approval to the work.

Failure to do so may seriously disadvantage the learner.

6.6.4 Some examples and situations

These are a few of the more common situations where the policy may help. It's not exhaustive and your External Verifier or Quality Manager are happy to help with specific advice and guidance.

Hearing impairment

Arrangements may include:

- communicators / interpreters (including lip speakers)
- extra time allowance
- mechanical and electronic aids
- induction loops.

Learners whose hearing loss causes a linguistic disability may have assessments with modified wording, as recommended by a specialist teacher of the deaf.

Visual impairment

Arrangements may include:

- an amanuensis (who takes dictation)
- a reader
- tapes
- question papers with large print, Braille or Moon
- a keyboard to produce typescript answers or raised type responses
- extra time allowance in a written, time-constrained assessment
- mechanical/electronic aids.

Physical impairment – permanent or temporary

Learners may be allowed

- an amanuensis and/or reader and/or interpreter
- extra time allowance
- appropriate mechanical/electronic aids.

Learning difficulties

In the case of learners with specific learning difficulties/dyslexia we may allow:

- extra time allowance
- tapes
- use of a keyboard to produce typescripts of answers.
- an amanuensis and/or a reader
- extra time allowance
- other audio/visual aids appropriate to the individual's needs.

Medical conditions

For learners with medical conditions such as diabetes, epilepsy and respiratory disorders we consider every case on its merits. For instance we may allow extra time for the assessment, if it's medically justified.

Hospitalised or confined at home

We can normally arrange assessments in hospital or at home, where it's essential.

Workplace constraints

If a learner does not have access to the right workplace circumstances for completing a work-based assignment, project or a similar assessment, we may consider alternatives such as work placements or scenario-based assessments.

In each case, you must:

- use the application form to propose the fairest alternative
- make sure that your proposals wouldn't result in unfair advantage over learners following the normal assessment route.

Absence for assessment

If a learner cannot attend any part of an assessment for any reason, you must notify your External Verifier straightaway. In some cases we may be able to agree alternative arrangements.

6.6.5 The application form

The form on the next page is the one you use to apply for more significant adjustments and consideration. You must:

- complete and return it to ILM as early as possible in the programme
- not implement any adjustment or consideration without approval.
- always use the form if you are proposing alternative assessments.

Application for reasonable adjustments or special consideration

Name of Centre

Centre Number Telephone Number.....

Centre Contact

Name of Candidate
for whom these adjustments are requested. (Please use a separate form for each learner)

Candidate Registration Number

Qualification

Assessment Component *(e.g. Work based Assignment, etc)*
.....

Reason for application: *(Please include full details, including medical evidence if relevant, and state whether the reason is temporary or permanent)*

.....
.....
.....
.....

Proposals for reasonable adjustments or special considerations: *(Include details of the amount of additional time, any special equipment, personal support or any other proposals)*

.....
.....
.....
.....
.....

Signed (for the centre) Date

Return to: Assessment & Qualifications Executive, ILM, 1 Giltspur Street, London EC1A 9DD

FOR ILM USE ONLY *(Tick the appropriate box, and provide full details in a letter to the centre of agreed adjustments where these differ from the centre’s proposals as above. This form to be retained in ILM London Office, with a copy sent to the centre, the ILM External Assessor where applicable, and the External Verifier, together with a copy of the letter setting out alternatives, where this is required.)*

ILM accepts the centre’s proposals as noted above

ILM will allow the alternative adjustments as set out in the attached letter

Signed (for ILM) Date

Role

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6.7 Approved Centre Criteria

Approved Centre status requires everything in the left column. The right column gives guidance on what you need to do to demonstrate success for each criterion.

1 Centre commitment, management and policies

	Criteria	Guidance notes
1.1	The centre has a single, named point of responsibility for the quality assurance and management of the programmes	This is the person to whom all correspondence will be addressed and will be identified on the front of your contract
1.2	The centre is financially sound, and makes reliable provision to support the operation of ILM programmes	Complete the account application form and send it to ILM Accounts (details are on the form). Centre approval cannot take place until the account has been approved. If you are already an ILM centre an account application form is not required
1.3	The centre's aims and policies in relation to ILM qualifications and plans for their achievement are supported by senior management and understood by the delivery, assessment and internal quality assurance team	This may be minutes of a senior management team meeting or extract from a business plan or training strategy that states that there is a commitment to leadership and management development and qualifications
1.4	The centre's access and fair assessment policy and practice is understood and complied with by learners and centre staff	This is your equal opportunities policy. It needs to have a section on training and development. There also needs to be an equal opportunities statement that talks about fair access to training and fair assessment within the learner handbook
1.5	Centre staff are aware of the ILM processes for arranging reasonable adjustments and special consideration (and for S/NVQs – particular assessment requirements) for learners, where required	Centre staff need to confirm that they have read and understand Section 6.6 of the centre manual
1.6	There is an established internal appeals procedure which meets ILM requirements, is documented and made available to all learners	Appeals procedure required giving specific actions and timescales. It should also note that if the learner is not happy with the outcome of the internal appeals procedure they have the right of appeal to ILM. See Section 6.2 of the centre manual for further guidance. You also need an appeals log to record any appeals that you may have
1.7	The roles, responsibilities, authorities and accountabilities of the delivery, assessment and internal quality assurance team across all delivery and assessment sites are clearly defined, allocated and understood	Provide guidance on the role of the trainer/assessor, internal and external verifiers in the learner handbook. Provide an organisational chart or table showing the names and roles that the person may undertake. You may need to make this qualification specific.
1.8	ILM is notified of any changes which may affect the centre's ability to meet the approved centre criteria, including changes to the personnel of the assessment and verification team	You need to confirm that you will notify ILM of any changes to staffing and seek approval for them before they become involved in a programme (this does not apply to guest speakers) and if you change your optional units, or mode of delivery

2 Programmes and learner support

2.1	<p>Information, advice and guidance about qualification procedures, assessment and practices are provided to learners and potential learners; and staff responsibilities are clearly and appropriately allocated</p> <p><i>An induction is established and details of programme and assessment are provided to learners eg a handbook</i></p>	<p>This is an induction outline. It needs to show the content and the timings. For specific details on what must be covered please refer to your programme specifications</p>
2.2	<p>Learner's development needs are matched against the requirements of the award and an agreed individual S/NVQ assessment plan is established where appropriate</p> <p><i>(This should include the appropriate diagnostics for selecting learners onto the programme)</i></p>	<p>This is the process that ensures learners are on the right level of management programme and whether they have additional learning needs. If you do not have alternative methods the best way to show this is through your learner registration form. The form needs to collect personal contact details including equal opportunities data (DoB, gender, disability, ethnic origin) which is required for ILM registration, personal contact details and e-mail (required for free studying membership). It should also include information about current job role, supervisory / management responsibility, previous qualifications and whether they consider that they may need any additional learning support.</p>
2.3	<p>Learners have regular opportunities to review their progress and goals and to revise their assessment plan accordingly</p>	<p>You can show this through your schemes of work / programme outlines (see 2.4 below) where you show where tutorials will happen and their duration. You also need a tutorial record form on which to log individual tutorial guidance given</p>
2.4	<p>The provision meets the knowledge and operational requirements for each qualification as set out in the ILM Programme/Unit Specifications</p>	<p>For each qualification (eg. L3 Award, Certificate and Diploma in FLM) that you wish to have approved you need schemes of work / programme outlines. These need to show:</p> <p>Title of qualification (including the units, credit values per unit)</p> <p>The induction</p> <p>The hours for each unit</p> <p>The minimum GLHs for the qualification</p> <p>Sequence, timing and duration of learning (both tutor and learner directed) and how this will allow the learning outcomes to be achieved</p> <p>When the tutorials will occur within the programme and their duration</p> <p>When assessment will happen, which assessments are to be used and how they meet learning outcomes and assessment criteria</p> <p>The units and learning outcomes can be cut and pasted from the specifications into your scheme of work / programme outline.</p> <p>Suggested reading list at the appropriate level.</p>
2.5	<p>Centre provision for learner support and guidance meets requirements as in ILM Programme/Unit Specifications</p>	<p>This is covered by your scheme of work / programme outlines and tutorial records (see above)</p>

3 Assessment

3.1	<p>Access to assessment is encouraged through the use of a range of valid assessment methods which comply with the requirements for specific qualifications as set out in ILM Programme/Unit Specifications</p>	<p>You need to compile an assessment pack for each qualification for use by tutor and assessment staff only. To do this you need to read your programme specifications carefully and extract all the information, paperwork/documentation that you need.</p> <p>ILM provides the mandatory assessments within the programme specifications and you can purchase the optional unit assessments from the customer service team. Once approved make sure that you have registered onto centres area of the website (see section 1.3.7 of the centre manual). Refer to section 1.3.5 for the link to ILM learning resources including assessments to purchase.</p> <p>The assessment methods for the optional units need to be indicated at approval (we suggest adding this to your scheme of work / programme outline) and you need to confirm if you are using the ILM designed assessments.</p> <p>If you want to write your own optional unit assessments, they should include the marking criteria and a copy of at least one assessment should be provided.</p> <p>All centre devised optional unit assessments and marking schemes will also eventually be discussed with your External Verifier.</p>
3.2	<p>Assessment is conducted by qualified and occupationally expert staff <i>(refer to staffing matrix)</i></p>	<p>Provide CVs for all your tutorial/assessment staff showing current and previous management responsibilities and qualifications (not marketing / promotional CVs)</p> <p>Management qualifications are not essential but staff must be able to demonstrate current occupational competence to the level that they will be teaching/ assessing.</p> <p>For S/NVQ staff A1/V1 certificates must be provided.</p>

4 Resources (including staffing)

4.1	Learning resource needs are accurately identified in relation to the specific award(s) and are made available to support the qualifications	For each qualification you need to provide 2 full teaching/lesson plans (session plans) and supporting material such as powerpoint slides, handouts and reading lists. The plans must be for 1 mandatory and 1 optional unit, or where there are only mandatory units provide two mandatory unit lesson plans. Ensure that these demonstrate how: <ul style="list-style-type: none"> • you will meet the learning outcomes • the indicative content will be covered (as contained within the programme specification) • learners are given the opportunity to transfer learning to the work place
4.2	Equipment and any accommodation used for the purposes of delivery and assessment complies with the requirements of relevant legislation, including health and safety, and provides access for all learners	Health and safety policy Employer / public liability Insurance if appropriate Statement within Learner Handbook If you are using external training premises, your risk assessment system. <i>Even if you deliver training on your client's premises as a centre you still need your own policy and it is your responsibility to ensure that health and safety is maintained</i>
4.3	There is sufficient competent and qualified staff to meet the demand for delivery, assessment and internal quality assurance activity <i>(refer to staffing matrix)</i>	This will be shown by the number of staff you request approval for. There must always be at least 2 for a programme to cover assessment and verification requirements plus more staff to provide back-up for unforeseen circumstances. You also need to consider the number of programmes you will have running at any one time You will be required to submit a profile of the staff to include evidence at the appropriate delivery level(s) of: <ul style="list-style-type: none"> • Teaching and training experience • Relevant qualifications • Relevant work place experience • Recent relevant professional development
4.4	All staff involved in ILM programmes have sufficient time, resources and authority to perform their roles and responsibilities effectively	This partially relates to 4.3 above. If needs be ensure you have associates on your staffing for approval. Colleges may find it helpful to provide their staff timetables to show teaching time and time for marking / administration
4.5	A staff development programme is established for the delivery, assessment and internal quality assurance team in line with identified needs	State if you are an Investor in People organisation Show how you will ensure that your tutor / assessment team will maintain their occupational competence and keep up to date with leadership and management theories/ thinking. This may be through ILM professional membership available at special rates for tutors and through the assessment support process (section 3.9.6) As a centre you need to keep CPD files for your staff and show that they have kept up to date

5 Quality assurance

5.1	Requests are complied with for access to premises, records, information, staff and learners for the purposes of approval and external auditing	You will need to provide access to premises or produce any information we ask to see and you will confirm this when you sign the contract with ILM
5.2	Queries about the qualification specification, assessment guidance or related awarding body material are resolved and recorded	Effectively you do this on the run up to approval through discussions with your Business Manager. Keep a record of these discussions / communications and continue this after approval including contact with your External Verifier
5.3	Assessment decisions and practices are regularly sampled and findings are acted upon to ensure consistency and fairness	You need a sampling plan – a spreadsheet is often useful to plan which learners' work will be sampled. A minimum of 20% across all assessments is required for a new centre (section 3.11.5 of the centre manual).
5.4	Internal quality assurance procedures and systems are consistent with national and ILM requirements, and ensure the quality, consistency and fairness of assessment practice	You need an Internal Verification / Quality Assurance policy which must state that a minimum of 20% of all assessments will be sampled and that the sample will take into account all assessors. It is usual to also state that the % of assessments sampled may also be increased for newly approved qualifications and new assessors.
5.5	Records of internal quality assurance activities are/will be maintained in line with ILM requirements and made available for audit purposes	Provide blank copies of the documentation on which Internal Verifiers will provide feedback to the assessors on their findings
5.6	Internal quality assurance is conducted by appropriately qualified and experienced staff	This refers back to the CVs you have been asked to provide
5.7	The effectiveness of the internal quality assurance strategy is reviewed against national and ILM requirements and corrective measures are implemented	You need to set up standardisation meetings in which assessors meet to standardise their marking. In smaller centres this can be incorporated with team meetings. See section 3.9.5 of the centre manual. Internal Verifiers also need to review at least annually the level of sampling that is being carried out and whether this is appropriate to their finding on the assessors marking. Everything needs to be documented. On first approval just show a schedule for these meetings and that they will be minuted

6 Communication and administration

6.1	There is effective communication within the delivery and assessment team, and with the awarding body	<p>Establish a team meeting with standing agenda items including:</p> <ul style="list-style-type: none"> Review of each programme Learner progress Learner and Employer Evaluations (see 7.1 above) Standardisation (see 5.7 above) Review of Internal Quality Assurance (see 5.7 above) EV Visits and Reports (see 7.3 above) Equal Opportunities (see 7.2 above) Centre development and future plans (7.4 above)
6.2	Information supplied to ILM for the purposes of registration and certification is complete, accurate and meets ILM's specified timescales	<p>At first approval there is little you can do to prove this. As a centre ensure you register learners within the required timescales and that your registrations are accurate. See section 5 of the centre manual</p> <p>If you are an S/NVQ centre show what processes you will have in place to maintain the 10 week rule</p>
6.3	Learner records and details of achievements are accurate, securely stored in line with ILM requirements and available for external verification and auditing	<p>Show how you will keep learner records, ideally in individual files, each with a contents list of what will be kept in each file eg registration forms, tutorial records, assessments, mark sheets and Internal Verifier feedback if appropriate.</p> <p>Attendance lists</p> <p>Registration records, mark sheets, Internal Verifier feedback and copies of certificates must be kept within the centre for 5 years</p>
6.4	Unit (or modular) certification is made available to learners	You just need to be aware that this is available

7 Evaluation and review

7.1	Learner, employer and other feedback is used to evaluate the quality and effectiveness of qualification provision against the centre's stated aims and policies, leading to continuous improvement	Show how you will evaluate your programmes both from learners, teaching/assessment staff and employers if appropriate
7.2	Information and recording systems monitor and review learners' achievements in relation to the centre's equal opportunities policy and implementation action plan	You need a tracking database – (excel spreadsheet may be helpful) so that at any point in time you can see how your learners are progressing through their qualification. You also need a system to monitor your learners achievements (completers, withdrawals, fails) against the equal opps data that you collected initially. This needs to be reviewed at least annually in your team meetings
7.3	Actions identified by external verification visits are disseminated to appropriate staff and corrective measures are implemented within agreed timescales	See team meetings above in 6.1
7.4	The centre's achievements against its plan are monitored and reviewed and used to inform future centre qualification development activity	Often included in team meetings (see 6.1)

6.8 Withdrawing or suspending a centre's approval

This policy applies to ILM approved centres and recognised providers.

6.8.1 Withdrawing approval

Centre approval or approval for specific ILM qualification(s) may be withdrawn by our written notice to you at any time if:

- the centre contravenes the current requirements of regulatory bodies, such as the *QCA Common Code of Practice* and the *NVQ Code of Practice*
- the centre has not complied with the approval criteria, or any of our policies, regulations, requirements, procedures and guidelines – including anything in this *Centre Manual*
- there are major deficiencies in the programme operation, including assessment and internal quality assurance process, and ILM reasonably believes that the centre can no longer ensure the appropriate quality of its provision
- the centre fails to disclose malpractice (see 6.2)
- we lose the right to offer the qualifications the centre is approved for – for example if the regulator decides to withdraw our accreditation because of low learner numbers registering for the qualification
- the centre does not meet its payment terms, or does not pay us for the services we provide
- the centre – or any individual agency if the centre is made up of a group, multiple delivery/assessment sites or consortium – becomes bankrupt or insolvent or goes into liquidation, or is subject to any voluntary or compulsory winding-up resolution or order
- there is any change in control of the centre, or (in the case of multi-site centre) any change in the membership of the group
- any other part of the City & Guilds group has withdrawn your ability to offer any or all of its qualifications

You must let ILM know of any of the above events at the earliest possible opportunity, ideally before they happen but certainly as soon as they do happen.

Where it is possible, practical and reasonable we may decide not to withdraw approval immediately, preferring to:

- discuss the problem and set a reasonable time limit for resolving the issues or
- withdraw approval for one or more specific qualifications, or
- suspend the centre instead

We may still withdraw centre or qualification approval, giving you notice of at least one month.

If we remove approval we may also specify the earliest date on which you may re-apply for approval.

6.8.2 Suspending approval

We may suspend all or any of a centre's activities – for example, its ability to register learners, claim certificates or make purchase orders – for a set period, or indefinitely.

This may be to give us time to find a remedy for a situation that would otherwise lead to withdrawal. Or it could be because we feel it is the appropriate action to take to protect learners or ILM – for example if the centre is under investigation.

6.8.3 Some common factors

These provisions apply to both suspension and withdrawal.

1. Centres have the right to appeal against withdrawal or suspension of centre or qualification approval (see Section 6.2).
2. If the centre consists of a group, multiple delivery/assessment sites or a consortium, we may withdraw or suspend approval for the centre as a whole, as a result of something that one or more of the agencies has or has not done.
3. To help learners who may be affected by suspension or withdrawal, the centre must co-operate fully with us, to enable learners to continue with their qualification. This normally includes providing full details of learners' achievements to date, and any other information or action that we need to find an alternative centre.
4. We reserve the right to withdraw the centre's use of the ILM logo or any other ILM trade mark, on suspension. The right to use the ILM logo ends automatically when we withdraw approval.
5. If asked, the centre must return any originals or copies of documents that belong to ILM, in hard copy, electronic format or any other medium.
6. We are obliged to inform the regulators – and relevant third parties such as other awarding organisations – if we withdraw approval. The details we pass on will identify the centre, and specify the qualifications we have withdrawn approval from.
7. Withdrawal or suspension does not affect any earlier claims for loss between the centre and ILM, or give rise to any new ones, except that:
 - centres will make good any loss that ILM may suffer as a result of the withdrawal or suspension, if it is the result of anything the centre has or has not done
 - ILM is still entitled to any money it was due before the suspension or withdrawal (plus interest from the date of withdrawal at 3% above the base rate, for the time being, of the Royal Bank of Scotland, less any money that ILM owes the centre).

6.9 Recognition of Prior Learning (RPL) and Accreditation of Prior Learning (APL)

This policy applies to ILM approved centres only.

The notes in this section:

- give guidance on the Recognition of Prior Learning (RPL) and the Accreditation of Prior Learning (APL), in the context of the Qualifications and Credit Framework (QCF)
- apply to learners registered on accredited VRQ programmes in England, Wales and Northern Ireland.

6.9.1 What RPL/APL is

Some learners already meet the assessment requirements for a QCF unit, although they have no formal recognition or credit for it.

Recognition of Prior Learning (RPL) or Accreditation of Prior Learning (APL) is an assessment process that deals with this situation. It allows a learner to demonstrate that they already have the knowledge, understanding and/or skills required for a unit in the qualification they are now taking.

As long as they meet all the assessment requirements, RPL/APL allows learners to receive credit for their learning, whether it was through non-certificated or informal learning, or workplace experience and reflection.

6.9.2 Your role and responsibility as a centre

It is ultimately the learner's choice and responsibility to decide whether to use RPL/APL as a route to claim credit.

The regulations require you to promote RPL/APL as an option to learners. However, it is certainly not always an easier, cheaper or quicker route to a qualification, and you must be careful not to present it as such.

As an ILM centre you must:

- have policy, procedures and practices in place to support and enable RPL/APL
- get your External Verifier's approval for your policy, ideally at the time of centre approval and certainly before you use the RPL/APL process
- have a transparent, rigorous and fair decision-making process for claiming RPL/APL
- ensure that whenever, wherever and however the learning took place, the learner presents evidence that demonstrates their achievement
- have a clear pricing policy, so learners know it is not a free service
- always identify RPL/APL on the Schedule of Results, for certification.

6.9.3 Three ways to achieve RPL/APL

NB: The term of recognition of prior learning (RPL) is used within the Qualifications and Credit Framework (QCF) to encompass Accreditation of Prior Learning (APL) or Accreditation of Prior or Experiential Learning (APEL).

There are 3 ways to get recognition or accreditation of prior learning.

1. Transferring certified achievements (credits) within the QCF and SVQ units

Credit for a QCF unit is transferable. So if a learner has successfully completed a QCF unit or SVQ unit and goes on to another qualification that contains the same unit or transfers from another awarding body to ILM, they can count credit for their original success towards the new qualification. You should send a copy of their Certificate to ILM at the time of their registration.

2. Bringing in certified and assessed achievements from outside the QCF

This is where the learner wants to claim QCF credit for achievements that were certified and assessed, but are not covered by the QCF.

You map the completed non-QCF Study Programme and its associated learning outcomes, to the learning outcomes and associated assessment criteria of the appropriate QCF unit(s). To help with this you can get a range of *APL Mapping Documents* from your Quality Manager, Quality Consultant or External Verifier. If the mapping covers all the unit learning outcomes the learner's prior learning is formally recognised and they can be given RPL/APL. Remember, that if the prior learning maps to a mandatory unit or units, your Schedule of Results must clearly show that the learner has completed the mandatory component(s).

If the mapping to QCF unit(s) is incomplete and some learning outcomes or assessment criteria are not met, the learner completes assessment of the missing elements, to provide evidence that they meet the learning outcomes.

3. Counting uncertified and/or unassessed learning or achievement

A learner may claim to have undertaken formal, informal or workplace learning that was not assessed.

This can be perfectly valid, but in this situation you have to:

- explain the knowledge, skills and performance requirements are for the QCF unit(s) to the learner, and ensure they completely understand them
- give the learner a copy of the unit(s) so that they can assess themselves against the unit(s) learning outcomes and assessment criteria
- identify and document what assessment the learner needs to undergo, and/or what evidence they need to submit, to satisfy the QCF unit(s)
- use professional discussion – possibly framed around the APL mapping documents – to back up the learner's assessment and/or evidence submission, and validate their claim

If the evidence submitted is valid, complete and current, credit can be awarded.

If it isn't, or there's any doubt, the learner must complete assessment for the missing elements.

6.10 ILM strategy for summative assessment

ILM is part of the City & Guilds group, and recognised by Ofqual as an awarding organisation able to confer qualifications on the National Qualifications Framework and Qualifications and Credit Framework. With this recognition, ILM has a responsibility to ensure the standards for those qualifications issued in its name. This responsibility recognises the importance of assessment as the means by which a learner can demonstrate their achievement of the appropriate learning outcome, unit and/or programme. The assessment process is integral to the maintenance of the standards of all ILM qualifications.

Assessment definition

Assessment is a tool to measure learners' knowledge, skill and/or ability within a specified domain. It is an evaluation process used to aid learning, its transfer into practice, and measure attainment of specified learning outcomes.

Assessment is often described as summative, diagnostic or formative. There are different definitions used, but for the City & Guild group's purposes:

- a) Summative assessment is a tool for evaluating learners' attainment of the required learning outcomes of the unit and/or programme. Summative assessment may be used to confer a grade or level of competence/achievement of knowledge.
- b) Diagnostic assessment is used to identify learning needs.
- c) Formative assessment is used to aid learning and measure learners' progression towards attainment of the explicit learning outcomes of the unit and/or award, highlighting their strengths and weaknesses within the domain.

Assessment vision – enhancing achievement in the workplace

To be effective, learning needs to embrace all stages of the Kolb learning cycle. For a vocational qualification this relates to a combination of both the learning and assessment journey.

Learning outcomes and assessment design provide the quality assurance to underpin confidence in the value of the accredited qualifications.

Summative assessment and marking provides the quality control by which individual ability is evaluated.

The learning outcomes and assessment will be designed to maximise confidence that the learner has acquired the necessary skills, knowledge and understanding; is able to apply them in an organisation/work setting; and, through reflection, to adapt their individual behaviours.

Ultimately it is a partnership of ILM, employers and the learner that establishes the performance benefits (i.e. learning transfer) of the qualifications.

ILM will maintain and further develop the expertise, skills and technology required to provide a comprehensive and flexible offering of fit for purpose qualifications and tools. These will be designed to meet the full range of assessment needs identified

across our customer base in order to provide a positive and valuable learning experience as well as assuring a highly skilled workforce.

To achieve the approach described above:

- ILM will ensure that all QCF Certificate and Diploma vocationally related qualifications (VRQs) require at least part of the summative assessment to show that the learner is able to influence organisation/workplace practices. This is achieved through work-based assignments and/or reflective reviews. It is desirable that various forms of assessment are used within the overall summative assessment undertaken.
- Equally, the assessment of knowledge and understanding may be undertaken using a wider range of assessment approaches (i.e. those permitted by QCF). These include: case studies, examinations, presentations, and professional discussions. Use can be made of technology (e.g. audio/video recording) providing there is clear traceability for assessment and verification.
- Where mandatory units are part of the rules of combination for a specific qualification, the specified assessment should be used. ILM is mindful that some employers may require a more integrative approach to assessment in order to meet business requirements. Such requests will be reviewed on an individual basis in collaboration with the external verifier, and must have prior approval from the Quality Manager.
- In practice, it is anticipated that the majority of ILM QCF units will continue to be assessed via stand-alone or integrated work-based assignments or reflective reviews. However, alternative approaches such as multiple-choice or short-answer questions can be used to assess ILM QCF Awards and a part of the overall assessment 'journey' undertaken in larger qualifications (i.e. Certificates & Diplomas), where this is appropriate.

Employment and volunteering

ILM also recognise that studying for management and leadership qualifications during periods of unemployment can help individuals accelerate their return to the workforce, by formalising evidence of knowledge/capability, and (ii) extending knowledge to address gaps in past experience. Hence it may be equally valid to base work-based assignments on volunteering opportunities and reflective reviews on recent employment (typically not more than 6 months previous, during which time the learner was in a job role broadly aligned with the level of the qualification).

Pass / fail

ILM QCF qualifications focus on the reliable identification of pass vs. fail through the summative assessment. Typically the required sufficiency is aligned with a minimum overall pass mark of 50%, along with section passes for each component of the mandatory units. Details of the requirements are published within each qualification specification.

ILM QCF qualifications do not offer 'merit' or 'distinction' grades. ILM actively support the acknowledgement of exceptional achievements by learners. This includes operating a 'learner of the year' award; and supporting Centres in their own Awards events. Further opportunities to enhance this area will be explored.

While all Learning Outcomes must be assessed, section passes are only required for mandatory units (integrated or stand-alone assessment being provided by ILM). Quality assurance practices ensure that all optional units are adequately covered within the scheme of work (SoW) and thus integration of the assessment of optional units (with typically a requirement to achieve a minimum overall pass mark of 50%) is encouraged where appropriate.

ILM focus on writing QCF units with Assessment Criteria that are sufficiently detailed to support reliable, valid and consistent judgements that a learning outcome has been achieved, without creating an undue assessment burden for learners or assessors.

In preparing marking schemes for QCF VRQ units ILM accepts that some Assessment Criteria can be judged as more important than others. Moreover, a holistic approach can be taken to the combined mark allocated across several Acceptance Criteria providing they are all part of the same Learning Outcome.

Languages

Within the rules of the QCF, ILM qualifications may be taught and assessed in languages other than English, Welsh & Gaeilge. This is approached on a case-by-case basis, and must be agreed in advance with the ILM Quality Manager. The decision will be made on the basis of whether ILM Quality Assurance processes can be operated to the same high standard as those applied to qualifications taught and assessed in English (and Welsh/Gaeilge).

Any ILM learner assessed in a language other than English, Welsh or Gaeilge will have this clearly stated on their QCF qualification certificate.