



Audit Report

Chartered Institute of Housing

20 November 2013

Note

Restricted or commercially sensitive information gathered during SQA Accreditation's quality assurance activities is treated in the strictest confidence. However, please note the following:

- ◆ The findings of this report and the associated Action Plan will be presented to SQA's Accreditation Committee.
- ◆ The report and Action Plan will be published on SQA Accreditation's website following receipt of the signed acceptance of audit findings.
- ◆ The contents will contribute towards the Quality Enhancement Rating which will, in turn, contribute towards the quality assurance activity and timescales.

Please note that SQA Accreditation's quality assurance activities are conducted on a sampling basis. Consequently, not all aspects of an awarding body's performance in quality assurance, contract compliance, implementation, awarding of certificates and fee arrangements (not an exhaustive list) may have been considered in this report to the same depth.

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Executive summary

This was the first audit of the Chartered Institute of Housing (CIH) since it was approved as an awarding body by SQA Accreditation in November 2011.

1.1 Scope and approach

The audit was designed to review and evaluate CIH's strategies, policies and procedures to ensure compliance under SQA Accreditation's *Regulatory Principles (2011)*, Regulatory Principles Directives, the requirements of the clauses within and any conditions attached to the Approved Awarding Body agreement and the Criteria for Accredited Qualifications.

As this was a full audit of CIH, all Principles were included within the scope of the audit.

A Requirement has been raised where SQA Accreditation found evidence that the awarding body has not met SQA Accreditation's regulatory requirements.

The following timescales apply:

- ◆ SQA Accreditation will issue this report within 30 working days of the audit date.
- ◆ The awarding body must sign and return the audit report and associated Action Plan within 30 working days of the audit report being issued.
- ◆ Within a further 20 working days of receiving the proposed Action Plan, SQA Accreditation will confirm whether the Action Plan is appropriate to address the Requirements. This will be subject to the actions proving appropriate to the issues raised.
- ◆ SQA Accreditation will monitor progress towards completion of the actions identified in the Action Plan.

A Recommendation may be recorded in instances where SQA Accreditation considers there to be scope for improvement. Where these are agreed during the audit, they are recorded on the report for future reference. As Recommendations are recorded for awarding body consideration only, it is not necessary to agree either actions or timescales to resolve these in the awarding body Action Plan.

1.2 Awarding body audit report timeline

CIH audit date	20 November 2013
SQA Accreditation audit report date	11 December 2013
Date audit report and Action Plan to be signed and submitted by CIH	3 February 2014

1.3 Background

CIH is the professional body for those working in the housing profession in the UK. It currently offers three SQA accredited qualifications in Housing Practice, Housing Maintenance and Community Action in Housing. CIH's headquarters are situated in Coventry. The Audit Team was provided with full access to the awarding body's premises, staff and documentation.

1.4 Overview

As a result of the audit and post-audit activities, five Requirements have been raised and one Recommendation has been recorded.

The five Requirements form the basis of the CIH Action Plan. This must be completed and submitted to SQA Accreditation for agreement within 30 working days of the audit report being issued. The Action Plan must be submitted by 3 February 2014.

Outcome(s)	Area(s) of concern	Risk rating
Requirement 1	Principle 2	High
Requirement 2	Principle 2	High
Requirement 3	Principle 3	High
Requirement 4	Principle 3	Medium
Requirement 5	Principle 18 and RPDIR-5	Medium
Recommendation 1	Principle 23	N/A

2 Audit findings

The following sections detail Requirements raised and Recommendations recorded against SQA Accreditation's *Regulatory Principles (2011)*, Regulatory Principles Directives, the requirements of the clauses within and any conditions attached to the Approved Awarding Body agreement and the Criteria for Accredited Qualifications.

2.1 Requirements

Principle 2. The awarding body must publish clear information on their products, services and associated charges and fees.

The Audit Team reviewed the information banked on Quickr and the content of the CIH website prior to the audit. They found that many of the documents were out of date, banked in the wrong Quickr folder or had been replaced, including some key policies. Many of the documents still referred to SQA Accreditation's *Awarding Body Criteria (2007)* instead of the *SQA Accreditation's Regulatory Principles (2011)* and there were inconsistencies regarding the SCQF levels and levels from another framework.

In addition the CIH website lacked current information on the SQA accredited qualifications offered by CIH and on its awarding body policies. It was not clear which qualifications were accredited by SQA Accreditation and there was no reference at all to the CIH Scottish Award in Community Action in Housing at SCQF Level 5. **Requirement 1 refers.**

The Audit Team spent some time with CIH to discuss the lack of uptake for the qualifications which were originally accredited at the time of awarding body approval. From the banked documents, they noted that there were Scottish housing associations which were offering CIH provision but not the awards accredited by SQA Accreditation. Further discussion also suggested that the award where there was potentially the most demand in Scotland was not yet accredited by SQA Accreditation. CIH was asked to investigate the demand with Scottish stakeholders to determine if the award now needed accreditation.

The Lead Auditor asked CIH to carry out a review of its Scottish qualifications to determine why there was no uptake for the SQA accredited qualifications and to ask that question of centres in Scotland that are using awards accredited by another regulator. CIH must also consider how it promotes its SQA accredited qualifications to stakeholders as it would appear that there is a demand from Scottish stakeholders for CIH qualifications but they appear not to be using the SQA accredited versions. **Requirement 2 refers.**

The evidence available indicates that CIH does not meet the requirements of Principle 2. This has been raised as **Requirement 1** and **Requirement 2**.

Principle 3. The awarding body must ensure that they employ robust processes to protect their own business interests as well as the interests of their approved centres and learners.

The Audit Team reviewed the banked documents for business planning and was uncertain as to where the awarding body's aims and objectives sat in relation to its wider strategic and operational objectives. These showed little consideration of CIH's awarding body objectives and the Audit Team were concerned by this.

After discussion with CIH staff it was evident that there is a lack of formalised planning regarding the awarding body's business direction, although it was indicated that this area is currently being addressed internally. The awarding body was asked to address this area as a matter of priority. **Requirement 3 refers.**

CIH carries out annual quality monitoring activity on its approved centre, currently there is one centre approved to offer SQA accredited qualifications. Whilst reviewing the *Centre Quality Review Visit Report* for the centre, the Lead Auditor asked the relevant CIH staff how actions identified during visits were tracked by the awarding body so that they could ensure these were closed.

CIH staff reported that there is no formalised mechanism for ensuring that the centre has closed out actions from visits undertaken. **Requirement 4 refers.**

The evidence available indicates that CIH does not meet the requirements of Principle 3. This has been raised as **Requirement 3** and **Requirement 4**.

Principle 18. The awarding body and their centres must deal with complaints on a fair and equitable basis, in line with their published procedures and timescales, and without unreasonable delay. The awarding body, their centres and learners must be made aware of how and when they can complain to SQA Accreditation. Where a complaint is upheld, the awarding body and/or centre must take appropriate, corrective and/or preventative action.

and

Regulatory Principles Directive 5 – Complaints Handling

The CIH *Complaints Procedure* does not take account of Regulatory Principle Directive 5 despite the fact that a copy of the Directive was e-mailed by the Lead Auditor to CIH in October 2013.

The policy also makes reference to SQA Accreditation's *Awarding Body Criteria (2007)* instead of the *SQA Accreditation's Regulatory Principles (2011)*. In addition, the Audit Team was also unable to find a copy of the *Complaints Procedure* on the CIH website.

Requirement 5 refers.

The evidence available indicates that CIH does not meet the requirements of Principle 18 and RPDIR-5. This has been raised as **Requirement 5**.

2.2 Recommendations

Principle 23. The awarding body and their centres must publish clear, fair and equitable procedures and timelines for dealing with enquiries about results and appeals. They must take appropriate, corrective and/or preventative action for all learners and centres affected.

The stages within the *Enquiries & Appeals Procedure* were reviewed with the relevant CIH staff as the Audit Team noted that the process was unclear regarding the grounds under which a learner could take their appeal to CIH regarding an assessment decision.

The wording of the policy currently states that: 'The learner may only lodge an appeal to the Awarding Organisation where the Centre processes have not been properly administered, and there are grounds for a case of Maladministration'.

The Lead Auditor noted that the statement was not inclusive enough and there could be a range of other possible instances where a candidate should be able to appeal to the awarding body.

This has been recorded as Recommendation 1.

3 Outstanding approval and accreditation conditions

A condition will be recorded at the time of approval of the awarding body or at the time of accreditation for an SQA accredited qualification. A condition is recorded when SQA Accreditation's Co-ordination Group (ACG) finds evidence that the awarding body does not fully meet the requirements under SQA Accreditation's *Regulatory Principles (2011)*, Regulatory Principles Directives, the requirements of the clauses within and any conditions attached to the Approved Awarding Body agreement and the Criteria for Accredited Qualifications.

Principle no.	Condition	Date due
N/A		

4 Risk rating of Requirements

SQA Accreditation assigns a risk rating to each Requirement recorded as a result of awarding body quality assurance activity. The table below illustrates how the rating for a Requirement is assigned. A weighting is applied that depends on the risk identified and the possible impact on qualifications and/or the learner of failure to implement that Requirement.

The assignment of a risk rating allows an awarding body to assign their resources to areas which have been identified as having a major impact on the qualifications and/or the learner. The risk rating also allows SQA Accreditation to assign its resources to support awarding bodies in improving their performance.

Risk	Impact of Requirements identified through quality assurance activity
Very Low	The Requirement has been identified as likely to cause minimal concern and would not threaten the integrity of the qualification or impact adversely on the learner. Any overall effect is likely to be small scale and/or localised, rather than widespread. The identified Requirement is unlikely to recur once resolved and no long lasting damage would be anticipated.
Low	The Requirement has been identified as low impact but is of sufficient importance to merit intervention, with a low threat to the systems or procedures associated with the qualification and/or impact on the learner. Disruption may not just be localised but more widespread and would possibly cause residual damage; however, this could be easily corrected without further consequence.
Medium	The Requirement has been identified as having the potential to damage the credibility of the qualification and/or be detrimental to the learner. There may be some impact to the systems or procedures that support the qualification or the operational effectiveness of the awarding body.
High	The Requirement has been identified as having a potentially high impact on the integrity and reliability of the qualification, or the effective operation of the awarding body as a whole, if corrective action is not quickly taken. There is a high probability that the qualification and/or learner will be negatively affected.
Very High	The Requirement has been identified as having a serious impact on the integrity and reliability of the qualification or the effective operation of the awarding body if corrective action is not immediately taken. There is a very high probability that the qualification and/or learner will be negatively affected.

In assigning a risk rating, each Requirement is considered on its own merit, taking account of the context in which it was identified.

5 Table of awards

Accredited qualifications currently offered by CIH.

SQA-accredited qualification title	Level	Code	Accreditation date	Re-accreditation date
<u>CIH Scottish Certificate in Housing Practice at SCQF Level 5</u>	SCQF Level 5	R198 04	29.11.11	31.08.16
<u>CIH Scottish Certificate in Housing Maintenance at SCQF Level 5</u>	SCQF Level 5	R199 04	29.22.11	31.08.16
<u>CIH Scottish Award in Community Action in Housing at SCQF Level 5</u>	SCQF Level 5	R247 04	02.08.12	31.07.16

6 List of documents reviewed pre- and post-audit

Document title	Date of issue	Version number
CIH AB Current and future activity	March 2013	
CIH Centre Contact Details CIH Corporate Plan 2012-2015	May 2012	
CIH AO Operational Strategic Plan 2012-15 overview	October 2012	
CIH AO CIH Awarding Organisation Externally set assignments		
CIH AB Centre QA Form A Assignment Approval		
CIH AB Centre QA Form B Moderation of student work	August 2012	
CIHAO Assessment Guidance	August 2011	
CIH AB External Quality Assurer guidance	2012	
CIH AB QA visit report	August 2012	V1.0
CIH AO Complaints Procedure	August 2012	V1
CIH AO Malpractice and Maladministration Policy		
Chartered Institute of Housing Q3 2013		
CIH Data Returns Q1 2012	October 2013	
CIH Data Returns Q1 (July 2013) amend		
CIH Data Returns Q2 2012		
Qualification quarterly data Q4		
CIH Awarding Body Fees 2013-14	Jan-Mar 2012	
CIH AO Replacement Certificates procedure		
CIH AO Sample unit certificate		
CIH Certificate New proof	June 2012	
CIH Sample Certificate (transcript goes on back of certificate)		
CIH AO Enquiries & Appeals Procedure	June 2012	
CIH Awarding Body Fees 2012-13		
CIH AO Annual Equality & Diversity Monitoring Report 2011		
CIH AO CIH Annual Report 2011		

Document title	Date of issue	Version number
CIH AO Equality & Diversity Policy CIH AO Reasonable Adjustments & Special Considerations CIH Education Advisory Committee Meeting Notes CIH Education Advisory Committee Meeting Notes Terms of Reference for the Education Advisory Committee CIH AO Summary of proposed changes to the Charter and Byelaws Letter of Support for CIH and SQA New Governing Board 25 October 2011 Press release Chief Moderator report 2011/12 CIH AO 2010 Awarding Organisation Annual Report to PD Board CIH AO Awarding Org Annual Report 2012 to Learn Board CIH AO Chief Moderator report 2010-11	December 2012 July 2012 Nov 12	
L2 survey evaluation L2 survey interim comments Level 2 survey evaluation	March 13 March 13 March 13	
Job descriptions for Staff involved in Awarding Body operations CIH AB Centre Approval Application Form CIH AO Record Retention Policy CIH AO CIH Market research & stakeholder engagement policy and procedure for the SCQF CIH AO Development and ongoing review of units and qualifications for use in the SCQF Flowchart - Market Research & Stakeholder Engagement process for SCQF Flowchart showing development and revision process for unit and qualification development		v4
2013 Qualification Review Report CIH Certificate in Housing Maintenance review report CIH Scottish Certificate in Housing Maintenance at SCQF level 5 - qualification snapshot CIH Scottish Certificate in Housing Practice at SCQF level 5 - qualification	June 2013	

7 Action Plan

A separate document in Microsoft Word has been forwarded with this Audit Report.



Areas of concern	Requirement	Risk rating	Proposed action <small>(Please include a description of your intended methodology and details of the evidence that will be provided.)</small>	Target date for completion
Principle 2	CIH must review the currency and accuracy of documents banked on Quickr. CIH must carry out a review of the information it publishes on its website regarding SQA accredited qualifications and associated policies.	High		
Principle 2	The awarding body must carry out a review of its SQA accredited qualifications and consult with stakeholders in Scotland to determine reasons for the lack of activity.	High		

Areas of concern	Requirement	Risk rating	Proposed action <small>(Please include a description of your intended methodology and details of the evidence that will be provided.)</small>	Target date for completion
Principle 3	CIH must demonstrate how its awarding body objectives are formally planned, monitored and reviewed. The objectives must take consideration of SQA accredited qualifications.	High		
Principle 3	CIH must ensure that actions raised as part of centre quality review visits are documented and monitored towards completion.	Medium		
Principle 18 and RPDIR-5	The awarding body's complaints procedure must take account of RPDIR-5 and, if required, reference the correct regulatory guidance document. The policy must be published on CIH's website.	Medium		

Signatures of agreement of Action Plan

For and on behalf of CIH:

Signature

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Date

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For and on behalf of SQA Accreditation:

Signature

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Date

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8 Acceptance of audit findings

For and on behalf of CIH:

Signature

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Designation

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Date

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For and on behalf of SQA Accreditation:

Signature

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Designation

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Date

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