

Centre Assessment Standards Scrutiny (CASS) And General Moderation Policy

1. Introduction & Core Principles

Gatehouse Awards (GA) is fully committed to maintaining the integrity of its qualifications, assessments, examination results and awards for the benefit of itself, its centres and candidates and in adherence to the Conditions of Recognition.

GA's approach to Centre Assessment Standards Scrutiny (CASS) and general moderation forms part of an overall control strategy applicable to qualifications where assessment is marked by a centre (Condition H2).

Three core principles continue to be at the heart of all decision-making in the design, development, delivery, award and quality assurance of GA qualifications:

1. Fairness to all candidates
2. Safe and secure certification of qualifications
3. Maintaining the integrity and credibility of the qualification system, ensuring that standards are maintained.

In support of this, GA requires all centres to deliver high quality learning and teaching (where applicable) and to provide valid, reliable, practical, equitable and fair assessment practices.

2. Purpose and Scope

Centre Assessment Standards Scrutiny ('CASS'), refers to the arrangements that have been put in place to check assessment decisions made by a centre (this is sometimes referred to as 'centre-assessed' or 'internal assessment').

Through CASS, GA will ensure that all reasonable steps are being taken to effectively determine whether or not:

1. an assessment remains, or was, fit for purpose, and
2. the criteria which candidates' performance is differentiated is being, or were, applied accurately and consistently by the assessment process in all centres.

This document covers the types of checks that happen before results are issued, the system of moderation, and the ongoing processes that happen before and after results are issued and qualifications are awarded.

It also covers other processes that support this, such as the way in which GA decides which centres can mark and make assessment decisions, how we monitor these, how we decide

whether to scale our controls up or down, and what action we may take if we discover an issue with any centre assessment or centre internal moderation activity.

These arrangements are in place to:

- ensure that all assessment decisions leading to the award of a qualification (or component of a qualification, where applicable) are valid and reliable and to determine that the assessment is, and remains, fit for purpose.
- ensure that the criteria upon which any and all examination and assessment results are predicated are applied consistently across all candidates, in line with equalities legislation, in order to provide candidates and the public with the assurance that the service is provided within a robust, moderated and quality assured framework.
- give effect to Quality Assurance by implementing quality control mechanisms in order that issues can be addressed in case of failure to meet minimum requirements.
- enable GA to comply with all regulatory requirements.

**This Policy does not apply to GA's Externally Assessed qualifications, the moderation arrangements for which are covered in additional Moderation Policy & Procedure documentation.*

3. Responsibility and Authority

The overall responsibility for this policy is held by the Governing Body, while the authority to design, implement, review and improve or update it is delegated to the Compliance Manager. The implementation of the GA CASS strategy contributes to GA's wider Quality Assurance processes.

4. Overall Rationale

The CASS strategy covers centre-assessed assessments. A range of controls are implemented which includes a robust system of moderation.

Moderation is a particular form of CASS through which the marking of assessments by centres is monitored to make sure it meets required standards and through which adjustments to a centre's marking are made, where required, to ensure that results are based on the required standard.

Moderation takes place before final results are issued to ensure that certificates are only issued to those who have achieved the required level of attainment to gain such a certificate.

It also looks to ensure that no candidate is disadvantaged by receiving a lower mark than they may otherwise have received had their assessment decision been made by a different assessor.

A wider series of centre controls is also implemented, where applicable to a specific qualification or centre, which involves periodically checking the marking of assessments by a centre either before results are issued, after results are issued or a combination of these.

Factors that we will consider are:

- the type, size and level of the qualification.

- the time the candidate will take to complete the qualification.
- the type of candidates who usually take the qualification.
- the assessment methodology (e.g. use of externally or internally set assessment materials; the differences in practical and academic assessment methods, etc).
- the number of component parts of the qualification.
- the range and type of evidence generated in the assessments.
- the number of candidates taking the qualification.
- the number of assessment and quality assurance staff within the centre.
- the relationship between the centre, GA and the qualification (e.g. if the qualification is a proprietary qualification).
- the risk level of the centre (and all considerations which feed into the risk rating of the centre, including, but not limited to, the length of time the centre has been approved, the history of compliance at the centre, the size and scale of the centre's operations and any information received about the centre, which may come to our attention at any point).

Where moderation is used as part of CASS, a range of factors about the qualification and each individual centre is used to inform and help GA to decide:

- the frequency and type of moderation to be carried out.
- the timing of the moderation activities.
- the number of candidates requiring moderation (sample size).

Where a wider series of centre controls are used as part of CASS for a particular centre, GA will also consider:

- the point in time in which the candidates receive their results.
- previous sampling of the qualification (and its component parts, where applicable).
- previous sampling of candidates.
- changes to the risk status of the centre in GA's Centre Risk Rating.
- the possible revocation of certificates and the implications and potential adverse effects of this.
- changes to systems and processes.
- previous recommendations or actions arising from previous visits or moderation activities.
- our own experience of awarding qualifications in this sector.

5. Policy

When deciding whether CASS by Moderation applies to any individual qualification, or the delivery of a qualification by any individual centre, whether at the design and development or review stage of the qualification, GA will consult the flow chart in Appendix 1.

CASS by moderation prior to results being issued will be GA's default approach to standards scrutiny, wherever this applies.

Alternative arrangements will only be implemented should CASS by moderation not be possible and a full rationale of why this is and what alternative controls are in place for the specific qualification or centre will be produced and made available to the Regulator upon request.

6. GA Centre Assessment Standards Scrutiny Requirements

GA will:

- ensure that all assessment activities are fair and consistent wherever the assessment has been delivered (i.e. which centre, region or country, etc.) and this will be continually monitored. This applies to all levels of qualification in a consistent and equal manner.
- ensure that the centre applies a rigorous internal moderation process to assessments to ensure the currency, reliability, authenticity, validity and sufficiency of the assessment for all candidates on all qualifications.
- wherever possible, given consideration of the factors listed in paragraph 4 above, insist that internal and external moderation always take place before results are issued for every cohort and make any changes to the results where necessary before results are issued.
- ensure that each centre has an assessment and moderation process which is fully transparent and that there is provision for candidates to appeal against an assessment decision (full details are contained in the published GA Appeals Policy and Procedure).
- require centres to maintain records of assessment, including records of the centre's internal moderation activities, standardisation, wider quality assurance processes and CPD in line with the GA Criteria for Centre Approval.
- monitor centres, the assessment and internal moderation decisions they make and candidates' attainment of the qualification standards to ensure the effective implementation of fair and consistent assessment within and across all qualification delivery and awarding.
- ensure that marking and assessment undertaken by the centre in respect of all components for a qualification is subject to scrutiny, although each component does not need to be the subject of scrutiny every year.
- conduct centre visits (remote or in person) and external moderation with the sample decided upon by GA, providing support to all centres in maintaining compliance and providing guidance and template documentation wherever possible.

7. Risk Based Approach to CASS

GA will ensure that the arrangements with centres are determined on a risk-based approach and keep arrangements under review on an on-going basis.

Amendments to our approach to CASS will be made where we consider it necessary in order to remove, reduce or mitigate any risks that have been identified in relation to a particular centre, assessment or qualification.

Such risk factors may include, but not be limited to:

- where a centre has not previously delivered a particular qualification, or component of a qualification.
- where there have been changes to the staff at a centre responsible for overseeing assessments of the relevant assessment by that centre.
- where there is a significant change in the profile of the centres entries for the relevant qualification, or the number of entries.
- where the centre has newly opened satellite centres.
- where GA has established there has been any malpractice or maladministration in relation to the centre's delivery, assessments, or issue of results.
- where the criteria against which the candidate's performance is differentiated and not being applied consistently by a centre in its assessments or the centre has made inaccurate assessment decisions.
- where the qualification is substantially different in type or content from any which we have made available before.
- where the professional standards for the qualification (e.g. a licence to practice) has changed.
- where information is received from other Awarding Organisations or the Regulator about the centre or conduct of any member of centre staff, where they are involved in the delivery or quality assurance of any GA qualification.
- where we feel our analysis of data and evidence suggests that a particular approach is necessary.

We will look at each instance on a case-by-case basis and decide for how long the relevant actions or amendments should remain in place depending on the situation.

We may put in place different arrangements for different centres or for specific assessments or for separate components within the same qualification.

We will make sure we are fully satisfied that each individual centre is able to deliver, mark and issue results for the assessment in a manner which allows GA to comply with the General Conditions of Recognition.

Depending on the severity of any issue identified which impacts on the centre's ability to make assessment decisions, GA will also consider whether it would be appropriate to make other awarding organisations on whose behalf the centre delivers qualifications aware of the relevant

performance issues. The Compliance Manager will make such decisions on a case-by-case basis.

We will keep our approach under review, to ensure it remains fit for purpose, and meets the requirements of Condition H2 on an ongoing basis.

7. External Moderation

All Centre Assessment Standards Scrutiny must be carried out by persons who have:

- (a) appropriate competence,
- (b) been provided with appropriate training, and
- (c) no personal interest in the outcome of the scrutiny.

In order to undertake a role as a GA External Moderator (also referred to as EQA, or External Quality Assurer), an individual must also be familiar with, and continuously refresh their understanding of:

- any and all current GA standards applying to the qualifications they moderate;
- any and all relevant policies, procedures, legislation and regulations; and
- any and all quality assurance and reporting requirements.

External Moderation will routinely involve formal scrutiny of the evidence the centre provides. Sampling should enable the moderator to evaluate how assessors have reached their decisions. The moderator must be able to follow clear documentation which clearly shows that the centre has checked that the evidence presented is 'CRAVES':

- Current: the work is relevant at the time of the assessment
- Reliable: the work is consistent with that produced by other learners
- Authentic: the work is the Candidate's own work
- Valid: the work is relevant and appropriate to the subject being assessed and is at the required level
- Evaluated: Where the learner has not been assessed as competent, the deficiencies have been clearly and accurately identified via feedback to the learner resulting in improvements in knowledge or competency leading to the award
- Sufficient: the work covers the expected learning outcomes and any range statements as specified in the criteria or requirements in the assessment strategy.

External Moderation will also consider the potential or actual conflicts of interest which could lead to adverse effects within the performance of markers and/or assessors and internal moderators, their ability to maintain standards and submit accurate, fair and consistent examination results and assessment decisions

8. The Role of the Moderator

Moderators must fulfil the roles and functions allocated to them in the GA EQA Person Specification and Job Description and in any and all of the relevant policies and procedures of GA.

Such roles and functions include but are not limited to:

- implementing and evaluating assessment & Quality Assurance procedures.
- supporting GA in identifying the assessment and moderation capacity required to deliver the qualifications it offers to centres and candidates.
- conducting moderation of assessment instruments, plans and guides on any occasion on which these are first used, or are revised, including documenting evidence of individual candidates' achievements.
- confirming that assessment decisions are fair, valid, reliable, consistent and practical.
- identifying areas of potential improvement within the assessment procedures.
- providing support and guidance to assessors/markers and internal moderators in the form of feedback and training.
- identifying the need to redesign assessments and/or associated materials.
- identifying the need to redesign moderation, moderation systems and tools if required.
- conducting moderation of assessment records and centre-generated evidence, using a risk-based approach.
- reporting to the Compliance Manager on the results of their moderation activities, including any assessment irregularities.
- ensuring that the results of the moderation are confirmed to GA's Centre Administrator staff in a timely manner in order that results and certificates can be issued within the timescales set out in the *GA Customer Service & Support Statement*.

When considering the volume of work per candidate to scrutinise, the External Moderator will not apply any rule of thumb such as '10%.' Rather, they will consider:

- the candidates' ethnic origin, age and gender to ensure a representative range is scrutinised.
- the assessors' experience and qualifications, workload and their occupational competence and experience. For example, if assessors are qualified and experienced it may not be necessary to look at more than one or two units per candidate. If assessors have less than 12 months' experience, are new to the centre or a particular qualification or perhaps have not assessed for a length of time, the Moderator will need to scrutinise substantially more of their decisions for the first 6 - 12 months.
- the range of assessment methods used for any one qualification, for example observation, witness testimony, professional discussion, reflective accounts, questioning, assignments, etc. products, RPL, simulation.

- previous feedback to assessors regarding good practice and/or involved highlighting development needs, for example If the centre internal moderator has a particular concern regarding the assessment decisions of a particular assessor.
- whether any changes have been implemented, for example where GA has made amendments to the qualification specification, or instances where industry practice or legislation has changed.
- the range of locations where assessments have taken place.

Where the External Moderator agrees with the assessment decisions, certification claims can go ahead.

Where the External Moderator does not agree with the assessment decisions, full feedback is provided to the centre, with action points agreed which relate to the centre's areas for improvement.

9. Incorrect Results given by a Centre

Where GA discovers that a centre has made an incorrect assessment decision or informed candidates of incorrect results, we will take all reasonable steps to prevent any Adverse Effect which could be caused or, where this is not possible, to mitigate and correct any Adverse Effect.

An Adverse Effect is most likely to be caused where the issuing of the incorrect result:

- prejudices the candidate who has been issued with the result or prejudices other candidates;
- adversely affects the standard of the qualification; or
- adversely affects public confidence in regulated qualifications.

In some instances, issuing an incorrect result could cause more than one Adverse Effect and these could happen at different times.

Where the issuing of the incorrect result has had or could have an Adverse Effect, the default position is that we will correct the result. In most cases this will either prevent the Adverse Effect from occurring or otherwise mitigate or correct it.

However, we recognise that correcting the result may have a negative impact such that, balancing this impact against the Adverse Effect(s) involved, it would not be a reasonable step for us to correct the result.

Even where we do not consider the issuing of the incorrect result has had or could have an Adverse Effect, it will have breached a Condition. Correcting the result will help remedy

that breach. Again, we recognise that in some cases the negative impact of correcting the result may be such that this would not be a reasonable course of action to be taken.

We would consider all relevant factors in order to:

- identify any Adverse Effects caused (or potentially caused) by issuing the incorrect result; and
- decide what action it would be reasonable to take, balancing any Adverse Effect against any negative impact which may be caused by correcting the result.

The list below sets out factors which we would consider when deciding on a reasonable course of action (alongside any other relevant factors):

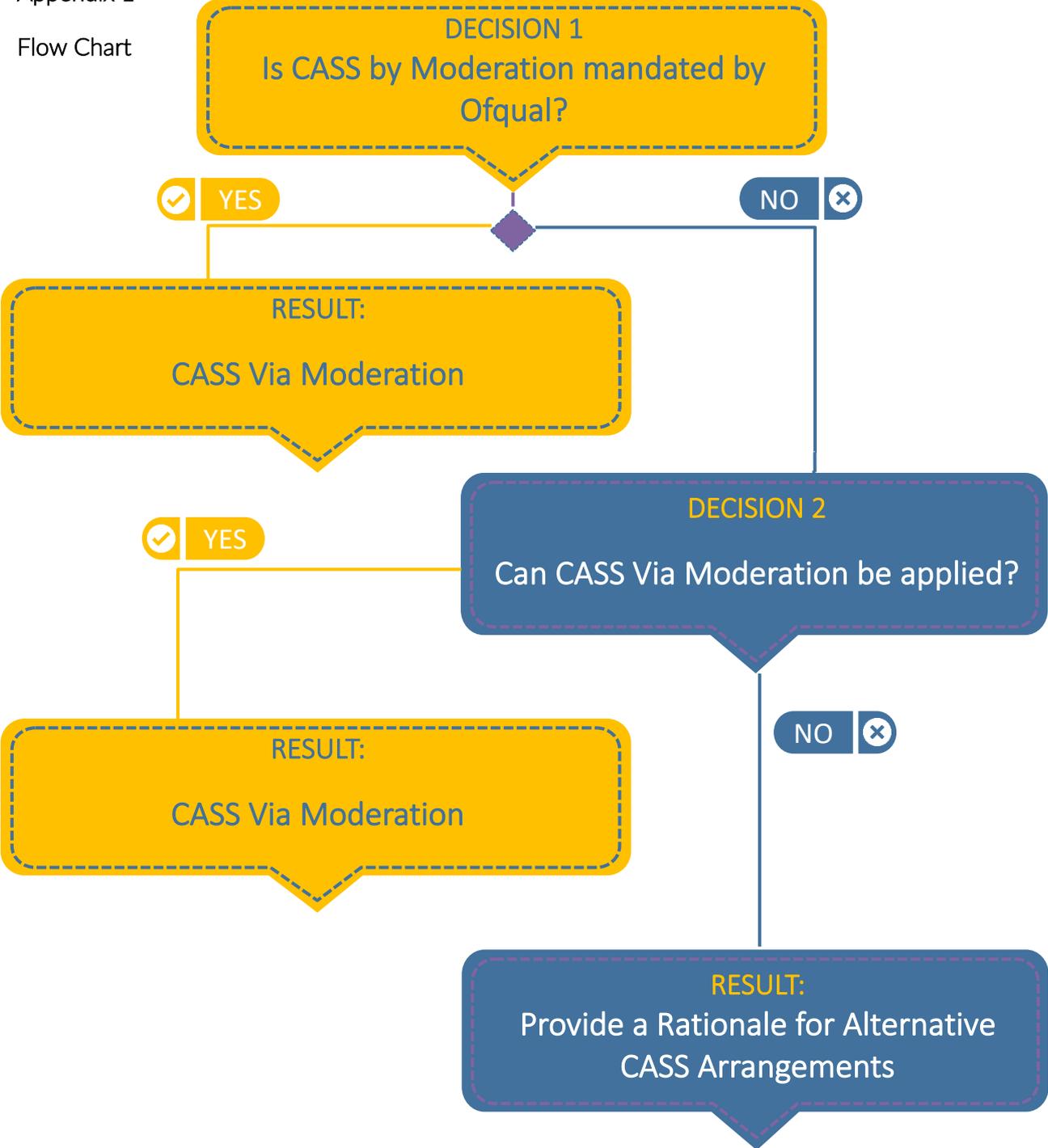
- The impact on the candidate who has been issued with an incorrect result: we will consider whether allowing an incorrect result to stand or correcting the result could prejudice the candidate. For example, prejudice may be caused if the result is corrected where the original result has already been used to make decisions, such as whether to re-take a qualification, enrol in further or higher education, or enter employment. Conversely, in some situations allowing a candidate to rely on a result which he/she has not actually achieved may prejudice that candidate.
- The impact on other candidates: we will consider whether allowing an incorrect result to stand could prejudice other candidates. For example, Candidate A could miss out on a progression opportunity to Candidate B because Candidate B has incorrectly been given a higher result than his/her performance merited.
- Public confidence: we will consider the impact on public confidence in regulated qualifications of it issuing an incorrect result and of the action it takes in response.
- Standards: we will consider the impact on the standard of the qualification if we do not correct the error.
- The number of candidates affected: the impacts on other candidates, on standards and on public confidence are likely to be greater where a higher number of candidates are affected.
- Reliance on the incorrect result by third parties: where third parties have relied on, or are likely to rely on, the incorrect result, we will consider whether that increases the possibility of an Adverse Effect. For example, if a qualification is a licence to practise, we will consider whether allowing a candidate who may not have demonstrated the level of competence indicated by the incorrect result to keep that result could have an Adverse Effect.
- Timing: the length of time since the result was issued and any indication given by the centre that the result may or may not be final.
- Malpractice: whether the candidate's own actions (including malpractice) contributed to the incorrect result being issued.

The extent to which each factor is relevant, and whether there are any others that should be considered, will vary. This could depend, for example, on the purpose of the qualification and

how it is used by the candidate or other users of qualifications. Consideration of all the factors may not all point towards one action.

We will determine which factors are relevant and give appropriate weight to these in each case when deciding on our course of action.

Appendix 1
Flow Chart



Document Specification:	
Purpose	To comply with the Ofqual requirement that all Awarding Organisations put in place a Centre Assessment Standards Scrutiny (CASS) strategy arrangement for all qualifications which are assessed via centre-devised (internal) assessment.
Accountability	GA Governing Body
Responsibility	Compliance Manager
Version	V2.1
Effective from	November 2021
Indicative review date	November 2023
Links to Ofqual GCR	Section H
Other relevant documents	Quality Assurance Policy/ Moderation Policy/Complaints Policy/Malpractice & Maladministration Policy/Centre Handbook/Sanction Policy/Centre Risk Register/Direct Claims Policy/Qualification Specifications/Centre Approval Process/EQA visit form/Appeals Process/Conflict of Interest Policy/Design of Qualification & Assessment Policy/Design of Unit Qualification Checklist/EQA Handbook