



Centre Assessment Standards Scrutiny Strategy

The Learning Machine

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Section 1: Regulatory requirements

The Learning Machine (TLM) is regulated by Ofqual and Qualifications Wales, and they require us to have in place arrangements for the approval of Centres delivering our qualifications and for the management and appropriate quality assurance of the delivery of those qualifications by our Centres. We must also ensure that the administrative requirements for our Centres are as clear and simple as possible.

So please read this document alongside our policies:

[Policy Download Centre – Welcome to the Ingot Family of Awards provided by TLM](#)

The purpose of this document is to set out:

- TLM's external quality assurance monitoring of our Centres.
- Our Centre Assessment Standards Scrutiny (CASS) strategy that is applied to our qualifications.
- Commitments required of our Centres for quality assurance monitoring activities.
- Our support and service to Centres.

TLM Centres must support us in our external quality assurance monitoring activities. In particular, you will also make available upon request any records, documentation or information required in the delivery/moderation of our qualifications. Your obligations are detailed fully in our TLM Centre Agreement:

[Terms and Conditions of Service – Welcome to the Ingot Family of Awards provided by TLM](#)

Failure to support TLM in these quality assurance monitoring activities may break your Centre Agreement with us and we may act in line with our sanctions Policy:

[Sanctions Policy – Welcome to the Ingot Family of Awards provided by TLM](#)

Section 2: Overall Approach

TLM will apply the CASS as set out in this document.

Qualifications with skills, behaviour and/or knowledge criteria

The majority of TLM's qualifications are based on Learners passing a coursework element, with grading options available through on-line examinations/assessments for performance table points. We offer on-demand examinations/assessments and 'formative sampling' of coursework with constant support and feedback. Our range of qualifications are also fully progressive with routes from Entry Level through to Level 3.

On-demand checking – formative assessment sampling

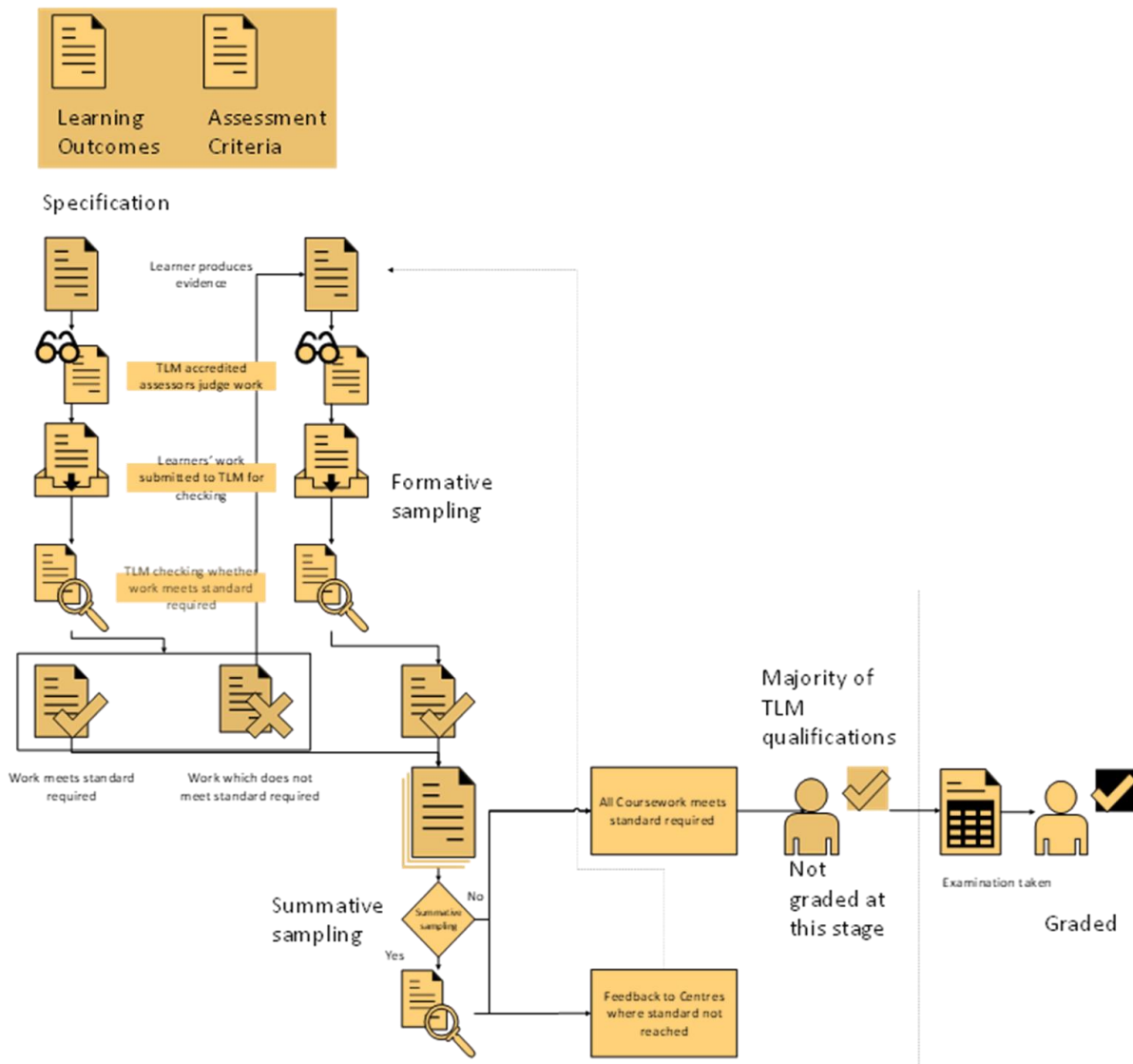
TLM operates an on-demand 'checking service' as this is most convenient for Adult Education Providers, Colleges and Schools. We aim to turn around evidence to be checked within a week of evidence provided by the centre, but we cannot guarantee to do this at the most pressured times. We advise our Centres to spread these checks as an on-going part of the course. Getting some work formatively checked early in the course is advised because the feedback from this will help you know if you are assessing Learners at the right level from the outset.

Since TLM do not grade coursework, this makes programmes of study much easier to manage.

Qualifications with Knowledge Criteria Only

Where TLM qualifications require the demonstration of knowledge and understanding only (with no practical skills assessment) - the assessment of this will be through multiple choice questions and/or some short answer questions, externally marked by us.

Centre marking will be subject to external quality assurance.



Section 3: Centres marking coursework

Centre approval

Centres need to contact TLM to arrange initial training. This will form part of your risk assessment. You must also read, understand, and electronically sign our policies concerning Malpractice, Maladministration and Conflict of Interest.

Centres must also send to TLM copies of their own policies covering Malpractice, Maladministration and Conflict of Interest. Each Centre has to have a Principal Assessor who is also an assessor trainer and can confer assessor status to suitably experienced colleagues. This again saves costs and time because you can become largely self-sufficient in managing your accredited assessors. Our model is based on economies of scale so the larger the Centre the less expensive per capita certification will be.

The TLM Centre agreement is here:

[Terms and Conditions of Service – Welcome to the Ingot Family of Awards provided by TLM](#)

TLM's External Quality Assurer (EQA) carries out an initial risk assessment at the Centre recognition stage ... and then annually on an on-going basis using our risk assessment criteria and gives a 'high/medium/low' risk rating.

Training and guidance for Centres delivering and marking coursework

There are a number of methods in which Centres are trained and receive guidance:

- Provision of on-line exemplar materials/qualifications' handbooks and support/guidance materials.
- EQA monitoring and support sessions.
- TLM annual Centre training/standardisation sessions.
- On-line formative sampling checks of Learners' work available 'on demand'.

TLM offer regular free workshops to Centres where they can discuss each other's work and at these workshops it provides sample materials and outcomes to ensure Centres evaluate Learners' work to the correct standards and level. The submitted judgements and required outputs will be checked by us and any issues brought up with you immediately if required.

Those Centres who consistently fail to meet the standard will be called in for additional training until they meet the standards.

TLM have a comprehensive training and on-boarding process for Centres that wish to offer our qualifications:

<https://theingots.org/community/train>

Staff from Centres will have access to bespoke online support sessions as required - where typically, they might be guided through the standards required by looking at exemplar work.

TLM produce a range of materials, including a ~~printed~~ and an online handbook, as well as other digital systems to assist Centres in the delivery of all our qualifications. We will provide you with effective and comprehensive guidance about our CASS, including the minimum expectations that you must meet.

Formative Sampling

In addition to the 'on-demand' formative sampling that Centres can request of TLM, EQAs will undertake formative sampling during monitoring activities in order to be able to provide timely advice and guidance to your assessment team to enable internal assessment decisions to be adjusted *in-flight* if necessary, and as a mechanism to manage any risk of disagreed assessment decisions at point of claim for certification.

Section 4: Monitoring

TLM's ongoing monitoring of a Centre once it starts delivering and marking coursework assessments, including the frequency of monitoring sessions and what we monitor - for example, Centre processes and procedures and/or Centre capability/capacity, as well as marking, is detailed below.

TLM External Quality Assurance Monitoring Procedure

TLM monitor our Centres using a combination of desktop review, 'face-to-face' and/or video/telephone conference call meetings – typically through Zoom/MS Teams.

The frequency and purpose of these monitoring sessions will be risk-based. In addition, an EQA may request that Learner coursework assessments where monitoring activity is not taking place 'face-to-face', are all uploaded to TLM's secure server on Next cloud.

This is in addition to any 'on-demand' formative sampling.

Copies of assessor and IQA documentation should be retained at the Centre.

Monitoring Activity Report

A Centre Monitoring Report will be produced by the EQA once the monitoring activity is complete, and this will include:

- Key Findings.
- Areas of Good Practice.
- Recommendations.
- Advice of any Sanctions or restrictions.



Centre Action Plan

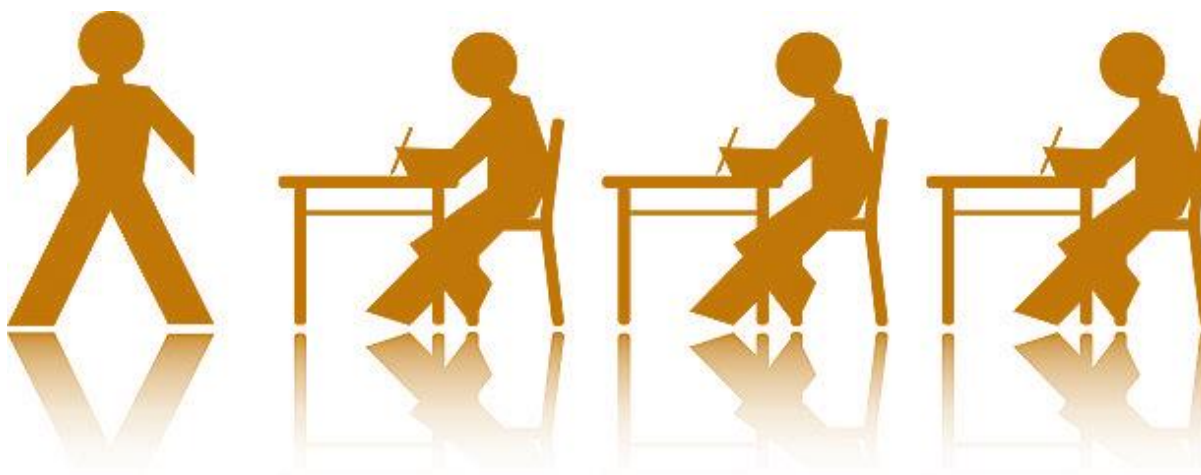
EQAs may well set actions to ensure Centres comply with TLM's standards and requirements. These required actions will be recorded in the approved Centre Action Plan which will be sent to your Head of Centre along with the Centre Monitoring Report following the monitoring session.

The EQA will monitor the completion of any actions set and may arrange a follow up activity for additional support and/or monitoring.

Heads of Centres are responsible for ensuring that findings from the Monitoring Report and Centre Action Plan are communicated to their staff and actions are completed within the set timescale.

Sampling

EQAs may sample a Centre's marking of Learners' coursework assessments prior to certification to ensure that your internal assessment decisions meet the required standards and may adjust your assessment decisions to ensure that results meet the required standards.



Sampling Strategy

EQAs will examine the marking/internal coursework assessment and internal quality assurance practices of Centres once coursework has been internally marked/assessed and internally quality assured by you prior to claim for certification.

The approach to monitoring will be supported by our sampling strategy – recorded and tracked through a Sampling Plan.

We will determine the sampling approach for each Centre based on previous findings, risk factors and Centre activity.

The TLM Markbook already has an automated system to show us the required amount of sampling based on a number of factors associated with the individual Centre. We will keep the criteria under review – but to illustrate:

Volume of learners registered on a grouping of qualifications	Selected units from a minimum number of learner coursework portfolios will be sampled, taken from all assessment sites, and including all assessors and IQAs
15 or less learners	10
16 – 50 learners	15
51 + to 1000 learners	25
1001 + learners	Discussion with TLM to manage sampling

Sample Size

All Learner coursework and related assessment documentation must be retained and made available to the Centre’s EQA. Learner assessment/portfolios must not be released prior to receipt of written confirmation from the EQA.

We will ensure that we scrutinise an appropriate sample of coursework marking by the Centre – in line with the minimum numbers set out above.

EQAs will apply a risk-based strategy, to Centres and qualifications, which may result

in the criteria selected for sampling being adjusted in light of any identified risks.

The EQA will determine the exact size of the sample and sampling frequency for both formative and summative sampling dependent on the risks as defined in this document, but as a guide the size of the sample will depend on a number of factors that may include (but are not limited to):

- Risk rating of the approved Centre – considering any specific risks that relate to that Centre, size, assessment, or qualification.
- The number (and where applicable type) of registered Learners and/or claims for certification
- The type, range, and number of qualifications and/or units being assessed.
- The number of Assessors (involved in marking the relevant coursework assessments) and IQAs and their familiarity with TLM's requirements and their history of successful outcomes during EQA sampling.
- The type and range of assessment methodologies and evidence types.
- The number of assessment sites/locations (where applicable).
- Range of achievement demonstrated by those Learners (where applicable).
- Changes in delivery of assessment.
- Changes in qualification requirements.

The EQA will undertake a minimum sample (as set out above) of any claim for certification or within any monitoring period and reserves the right to request a 100% sample or additional sample at any time.

We will allow Centres to select examples of coursework for consideration, but we will also where we consider it necessary in light of any risks that we have identified, select for scrutiny examples of additional coursework marked by you which go beyond those suggested by yourself. This may in effect mean that we then take random but statistically proportionate samples of coursework marking from you.

We will ensure that coursework marking undertaken by the Centre in respect of all Components for a qualification is subject to scrutiny, although each Component may not need to be the subject of scrutiny every year.

We will keep under review our monitoring and sampling approaches based on specific risks relating to each approved Centre or qualification and adjust our approaches accordingly.

Section 5: Risk based approach

TLM take a risk-based approach to CASS and have arrangements in place which go beyond our regulator's minimum requirements where we consider it appropriate to do so both as part of our obligation under Condition D3.1 to keep our approach under review and, under Conditions A6 and A7, in response to any particular risk identified or incident which has occurred.

Factors considered

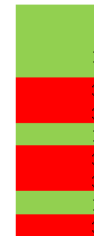
Factors that TLM consider when determining our approach to conducting CASS include the following:

- The typical course of study for the qualification – for example, whether it is sessional or whether it is roll-on/roll-off and whether there are fixed start or end points for the qualification.
- The typical duration of the course of study – for example, the number of terms a Learner typically takes to complete the qualification.
- The typical Learner for the qualification and type of Centre delivering it – for example, whether these are school/college students, or employees taking qualifications through a training provider or employer.
- The number of coursework components in the qualification and the number of these that are marked by a Centre.
- The typical evidence generated by a Learner in assessments for the qualification – for example, a portfolio of evidence, a performance, or a task/assignment.
- The assessment model – for example, whether coursework components are graded or marked.
- The number of Learners taking the qualification – the overall number and whether these are following the same course of study or are part of different intakes per term.



We use these factors to determine risk:

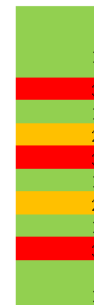
Qualification	Risk factor judgement
Course of study	Sessional
Start/end-points	Variable
Duration	Shorter than 1 term
Evidence	Performance or a task/ assignment
Assessment model	Graded
New type of qualification?	Not established type, dissimilar to those already offered
Occupational?	Not occupational
Data/ evidence suggests particular approach?	High attention/ controls



Qualification risk (8-24)
18

Combined risk (18-54)
36

Centre	Risk factor judgement
Typical learner	Employees/ adults (>19)
Centre type	Training provider
Components	<3
% components marked by Centre	50%
Learner numbers	High
Learner intake type	Single cohort intake
Centre previously marked assessments?	Yes, limited number
Staff overseeing marking?	Established
Profile of entries?	Variable and unpredictable
Issues with Centre (mp/ mp, marking/ results accuracy)?	No issues recorded



Centre risk (10-30)
18

Consideration of these risk factors influences the controls we put in place as part of our CASS arrangements, for example in relation to:

- The typical frequency and type of monitoring activities it conducts in respect of the Centre – as set out below.
- The timings of such monitoring activities – for example, whether these happen during or after each term.
- The number of samples of coursework marking sampled and the method, during monitoring activities – the number of samples of coursework marking and also which parts are sampled, for example whether these relate to Learners that have started the course of study at different times.
- The time period over which all aspects of coursework marking for a qualification are sampled – for example, whether every aspect of coursework marking is sampled every year.
- The number of Learners sampled during each activity for each aspect of coursework marking.
- Whether samples of coursework marking checking involves Learners that have already received results for their qualification or only those that have yet to receive results.
- Whether all or some Learners are sampled prior to receiving results, and the intended outcome of activities – for example, whether it would be likely to inform future changes to processes, require reassessment of Learners that have not yet received results, or lead to revocation of certificates that have already been issued.

Qualification risk factors

As part of our overall assessment (see risk grid above), TLM consider risk factors for our qualifications. These include but are not limited to:

- Where the qualification is substantially different in type or content from any which TLM has made available before.
- Where the professional standard for a qualification (for example, a licence to practise) has changed.

Where TLM's analysis of data and evidence suggests that a particular approach is necessary.

Risk assessment of Centres

We will monitor Centres and our qualifications based on our risk assessment using quantitative and qualitative data gathered over time.

Risk will be determined by a Centre's performance against a number of risk indicators. These include, but are not limited to:

- Size of Centre.
- Number of Learners.
- Range of qualifications offered.
- Sanctions or Restrictions placed on a Centre.
- Malpractice or maladministration issues.
- Performance over time.
- Attendance at TLM Induction/Standardisation events.

New Centres and/or TLM Centres delivering new qualification types or using new methods of assessment will be deemed 'high risk' and may well be subject to greater scrutiny.

Our risk rating of Centres is an internal measurement to assist us in planning appropriate monitoring activity and will not be shared outside of TLM.

We will decide upon monitoring activities following our internal guidance and procedures; however, the frequency, type, and duration of our checks will reflect a Centre's risk rating and may include a range of activities.

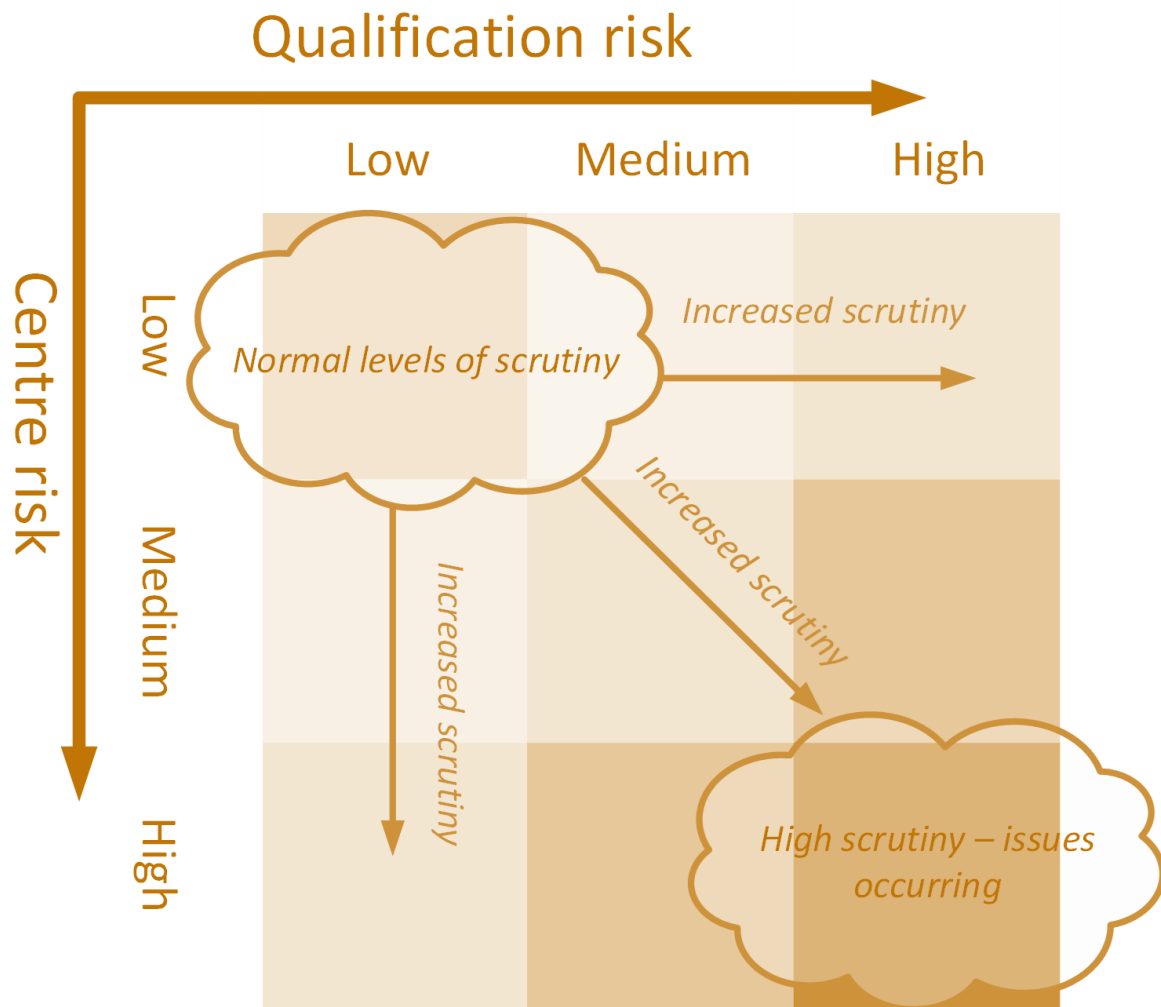
These include, but are not limited to:

- Learner progression and achievement.
- Compliance with TLM centre requirements.
- Formative sampling.
- External Moderation (summative sampling) of Centre assessment decisions prior to certification.

Combining risk considerations to determine CASS regime

In considering all these factors, TLM has ensured that our approach to risk in relation to CASS is based on appropriate evidence.

The table below sets out the minimum monitoring activity and shows the type of monitoring activity a Centre may experience dependent on its risk profile:



The other main risk factors that we combine and then consider are the numbers of Learners from a Centre and the complexity/nature of interactions with a Centre (see previous section).

These factors together help us to determine our overall approach. They also help us to decide whether we might move away from our standard pricing policy. The following scenarios illustrate our approach.

Scenarios

1. A **new Centre** with low numbers of Learners offering higher-risk qualifications.

In this scenario you might experience a few more checks on your assessments to ensure that for the qualifications that you are offering, the assessments are being delivered appropriately. As your numbers are low the monitoring of other aspects of your operations by TLM might be lighter touch, i.e., a monitoring session might be done remotely. The Pricing approach might also need to be agreed using a bespoke model for you.



2. An **established Centre** offering low-medium risk qualifications in high numbers.

Here our standard CASS approach would be adopted with our standard pricing applied. Typically, this would entail:

Minimum **one EQA Monitoring Session** p.a. (virtual or face-to-face) to include:

- One formative sampling activity, to be agreed with Centre (in addition to those requested by Centre 'on demand')
- One Assessor observation (where applicable) – and where appropriate, observation of the marking by the Centre of the coursework assessments

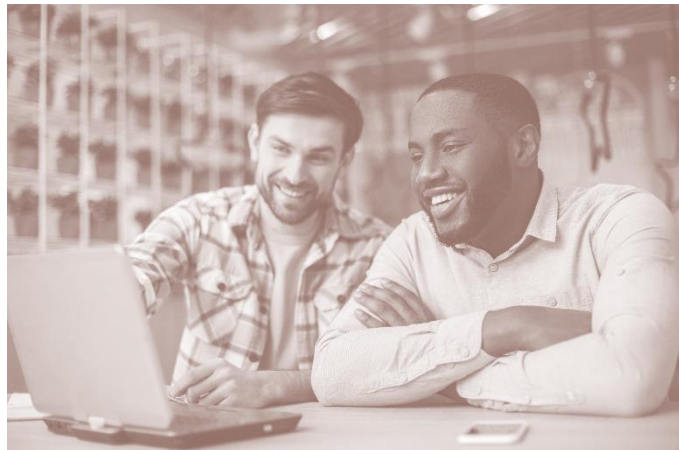


observed

- Audit against TLM approved Centre Agreement every year – normally remotely

3. A centre that has had *difficulties with a malpractice issue* that has required intervention by TLM.

In this scenario you may be subject to an increased number of checks for a brief period of time until we are collectively satisfied that no further issues remain. This might look like this:



Minimum **three EQA Monitoring Sessions** (Interims + Annual) p.a. (virtual or face-to-face) to include:

- Two formative sampling activities (in addition to those requested by Centre 'on demand')
- Two assessor observations (where applicable) – and where appropriate, observation of the marking by the Centre of the coursework assessments observed
- Summative sampling activity prior to certification
- Two audits against TLM approved Centre Agreement every year (one remote, one site session)