



Chartered Trading
Standards Institute

Qualifications Review 2021 Consultation

CTSI Board sponsored review

Date: May 2021

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Foreword

The delivery of qualifications is key to our professional body. The building of competence in the Trading Standards profession not only delivers consumer and business confidence, it is also what connects us as a profession. The qualifications must be relevant to all Trading Standards roles, in both public and private sectors.

There has recently been a lot of changes in the Trading Standards landscape and so this is an appropriate time for a review of our qualifications. We need to continue to make the qualifications relevant to our members, prospective members, employers and our wider stakeholders.

The emphasis of this review is on evolution not revolution. Its objectives are to examine the transparency of our decision making, and to test the model to ensure it promotes inclusion and diversity. **The results of this review will have no impact on students currently engaged in the CTSI qualification.**

Our aim is to have a qualifications framework that is accessible to everyone working in trading standards roles, from those right at the start of their career, those who join Trading Standards from other disciplines through to experienced staff that may need to top up on new competencies as their role changes. This review will also encapsulate the work we are undertaking through the Membership Review, we want to attract more people to undertake our qualifications and subsequently join us as members of CTSI.

The review is commissioned jointly by the CTSI Board, Council and Executive. Phil Owen is the Executive Lead for this review, having full CTSI Board approval & authority to act. Support from the Qualifications team and those of the profession involved in the delivery of the qualifications is essential to successfully complete this review.

We hope you will have the time to consider your current experiences of the qualification attend one of the focus group sessions if you can and provide your vital feedback.

Thank you

Wendy Potts Chair of CTSI Council

Noel Hunter Chair of CTSI Board

John Herriman CTSI Chief Executive

Introduction

The Chartered Trading Standards Institute (CTSI) administers and delivers the trading standards qualifications and competency framework, including the examinations, assessment and awards processes. This enables those working in trading standards roles and their employers to have access to a comprehensive programme of study and assessment that delivers nationally recognised professional qualifications and awards. The last review of the framework and its operations started in 2014. Much has changed in the trading standards delivery landscape since then and employers, learners and other stakeholders are increasingly questioning the CTSI qualifications offer. The broad themes of their challenge relate to its relevance to current trading standards roles, employers' requirements and its attractiveness to potential learners and members. There are also challenges in relation to its deliverability, sustainability, and affordability. In addition, there are new qualifications and training opportunities in the trading standards landscape. Our qualification must relate to other professional and work-based learning such as Apprenticeships Schemes.

It is important that CTSI's qualifications adapt to meet the needs of its many stakeholders now and into the future and that the Institute has the appropriate mechanisms to deliver it in a sustainable way. In conducting this review, it is vitally important that we consult with the profession and stakeholders to seek a broad range of views and understand priorities so we can build support for any changes identified and clearly demonstrate the rationale and evidence base these have been drawn from. Members have direct understanding of what is working on the ground and we are keen to hear their experiences, understand how we can build on the positives and make the appropriate changes to resolve any barriers to participation.

It is important to emphasise that the aim of the review is evolution not revolution, any changes proposed will be built from the existing qualifications framework.

The review at a glance

The review has three principal areas of focus:

Governance – to review the governance arrangements for the qualifications, examinations, assessment, and awards processes. To ensure accountability, transparency, and responsiveness of the framework to meet changes in the trading standards workforce. Where necessary provide clarity on the respective roles of Council, the governance groups relevant to qualifications and the Institute’s Executive.

Model – to review the current qualifications model and consider developments that might make the qualifications more inclusive and relevant to the changing needs of employers and prospective learners, taking account of current and future developments in competency-based learning such as the Apprenticeship programme.

Delivery - to review the operational delivery arrangements for the qualifications, examinations and awards processes and if shortcomings are identified suggest recommendations to improve the administrative, data processing and operational aspects of the qualifications. To examine the delivery of training content (both online and face to face). The aim of any reforms would be to improve resilience, confidence and rigour in the qualifications, examinations, and awards processes.

Audience

Employers, learners and relevant stakeholders including: CTSI Council members; CTSI members; Government stakeholders, Heads of Service, trainers and examiners etc.

Consultation arrangements

Duration

April 2021 - Consultation opens to seek views on the governance arrangements and qualifications model. Consultation closes end of June 2021.

Respond

Responses and suggestions to be sent to qualification-review-2021@tsi.org.uk by **30th June 2021**.

CTSI members and stakeholders and will also have the opportunity to engage directly in the review through a series of hosted sessions:

CTSI Members: TBC	Council members: Date TBC
Employers/Heads of Service: Date TBC	Business Members: Date TBC
Government Stakeholders: Date TBC	Students: Date TBC
Trainers and Examiners/Moderators etc. Date TBC	Board members: Date TBC

Confidentiality and data protection

Information you provide in response to this call for evidence, including personal information, will be processed in accordance with all applicable UK and EU data protection laws.

CTSI will summarise all responses and publish a response to this consultation. The summary will include a list of names or organisations that responded, but not people’s personal names, addresses or other contact details.

Consultation details

Governance

Why is governance important?

CTSI is a Royal Charter body, the effective guardianship and operation of its professional qualifications sits at the heart of this. Clear and transparent governance is central to the delivery of credible qualifications, examinations, assessment, and awards processes. It is important that the governance arrangements and the processes needed for decision making are clearly established and articulated. The governance arrangements need to carry the confidence of stakeholders, as ultimately this provides the assurance to the public and businesses of the competency and professionalism of those that hold a CTSI qualification.

This assurance is built from the content of the CTSI Professional Competency Framework (CPCF) being relevant to the roles and powers that trading standards professionals exercise, the assessment and examinations processes reflecting the academic and technical standards established by the framework and being conducted with appropriate rigor and the process for certifying results and granting awards being robust.

There are in essence three essential governance processes:

- Oversight of the qualifications and competency framework, including the model and content of the qualifications.
- Oversight of the assessment and examinations processes.
- Oversight of the awards process, including the handling of appeals and the certification of results and granting of individual awards.

The governance arrangements exist to provide oversight and challenge, hold the activities of the Institute's Executive to account and formally discharge Council's role as the awarding body. Therefore, it is important that the governance and oversight arrangements, have a degree of separation from the day-to-day activities of delivering and administering the qualifications.

What is the current approach to governance?

CTSI Council, is the awarding body for the Institute's qualifications. These responsibilities are discharged by Council through the appointment of a panel comprising members of Council and other appointed experts. This panel is the 'Qualifications and Awards' Board, (QAB). It undertakes all three of the functions outlined above on behalf of Council. The activities relating to examinations and assessment are considered through an Examinations and Assessment Board (EAB), this reports to Council through the QAB. The structure of these two governance groups is set out below.

Current Qualifications and Awards Board (QAB) - reports to Council

- 4 Council members
- 2 appropriate officers of the Institute's Executive
- 2 of the Institute's Lead Officers for Education
- 1 nominated member – in an advisory capacity
- Chair with appropriate expertise or Vice Chair

Current Examinations and Assessments Board (EAB) - reports to the QAB.

- Chair and Vice-Chair appointed by the Institute's Executive
- relevant central government departments
- enforcing authorities

- business and other individuals (by invitation from the Executive to bring appropriate expertise and involvement with the training and qualification process)
- Moderators
- Examiners
- lead external verifier

Points for consideration.

Are the current governance arrangements, their purpose and responsibilities understood by those involved in delivering the qualifications framework or by stakeholders? The Institute's Regulations relevant to qualifications, establish roles for Council, Board, QAB, and the Executive have developed piecemeal over time and is it now appropriate to consider these in the round?

Does the QAB have the appropriate membership? Given the multitude of stakeholders that have an interest in the Institute's qualifications is there a need to broaden the governance relevant to the qualifications framework and model to secure effective buy in and fully consider deliverability and affordability at the design stage. Does the current EAB have sufficiently broad membership? To provide effective oversight of the examinations, assessment and awards processes, would the governance of these benefit from being separate from the governance of the framework and model? Is there a need for greater challenge and academic rigor through a more focused approach?

Council, as the Institute's principal governance forum and as the awarding body for the Institute's qualifications, must have clear line of sight of the arrangements. It must provide separation from the Executive's role in operating and administering the qualifications, examinations, assessment, and awards processes and ensure it has access to relevant advice and recommendations to ensure effective oversight and challenge. Effective governance will build confidence in the Institute's processes and assurance for learners, employers, and our stakeholders.

To deliver the objectives set out above, the following is proposed:

1. More clearly articulate the roles of Council and the Executive.
2. Establish a Qualifications Board (QB), with broad membership to oversee the Institute's qualifications framework and model and provide advice and recommendations to Council and the Executive.
3. Establish an Examinations and Assessments Board (EAB), with a tightly drawn membership, to oversee the examinations and assessments processes, to hear appeals and discharge Council's responsibilities in respect of certifying examination and assessment results and granting awards in the framework and other associated awards made by the Institute.

Proposed roles of Council

CTSI Council is the custodian of the qualification's framework and its associated governance. The Institute's regulations designate it as the 'awarding body' for qualifications. Recognising that Council is a large diverse body, it is proposed that it establishes arrangements to effectively discharge the following responsibilities:

1. establish a Qualifications Board (QB), agree its terms of reference and membership.
2. appoint appropriate representation from Council to the QB.
3. commission the Executive, in consultation with the Board, to conduct periodic reviews of the Qualification framework and model.

4. receive advice and recommendations from the QB on any significant changes or amendment to the Qualifications Framework or model.
5. establish an Examinations and Assessments Board (EAB), agree its terms of reference and membership.
6. delegate its responsibility for the granting of awards in the qualification's framework to the EAB.
7. receive reports on the granting of awards from the EAB.
8. appoint appropriate representation from Council to the EAB.

Proposed role of the Executive

CTSI Executive is responsible for the effective administration and delivery of the qualification's framework and its associated processes and procedures. The Executive oversee the day-to-day operation of the qualifications, examinations, assessment, and awards processes. Principally the Executives functions within the framework are:

1. ensuring there is access to effective provision of training and training materials for learners,
2. lead the relationships with training providers, the Institute of Apprenticeships and other professional bodies.
3. ensuring the competency of trainers, examiners, and assessors.
4. ensuring effective processes and systems are in place to effectively administer the qualifications framework.
5. lead the relationships with relevant Government departments that have an interest in the qualification's framework.
6. administer the Lead Officer for Qualifications network
7. ensuring effective processes are in place to set and administer the examinations and assessment processes and provide timely and accurate information to the EAB to enable it to certify the results of examinations and assessments and make awards.
8. providing effective secretariat for the various governance processes associated with the qualification's framework.
9. conducting periodic reviews of the framework, following commission from Council, and associated processes and making proposals for the QB to consider

Proposed role and membership of the Qualifications Board

The Qualifications Board (QB) would be a newly established body bringing together the principal stakeholders with an interest in CTSI's qualifications framework. Its role would be advisory and would provide oversight and challenge to Council and the Executive of the qualification's framework, model and its administration. It would have the ability to provide advice and make recommendations to Council on proposals for changes and improvements. It would to provide advice and make recommendations to the Executive on the operation and administration of the framework. Its membership should be broadly drawn and members of the QB would either represent their respective organisations or provide expert advice.

Proposed role and membership of the Examinations and Awards Board

The Examinations and Awards Board would also be a newly established body. Its role would be to take responsibility for the oversight of the examinations and assessment processes, the Executive would follow its advice and recommendations in how it administers the examinations and assessment processes. It would be responsible for considering and deciding on appeals made by learners. In addition, it would exercise delegated authority from Council to certify the examination and assessment results, make

awards in the framework and other associated awards granted by the Institute. Its membership would be tightly drawn. Its membership would not include individuals that are already members of the QB or those members of the Executive that are directly involved in the administration or delivery of the framework. A number of EAB members would have direct experience and knowledge of academic examinations and assessment processes.

Questions for discussion on Governance:

1. Would the proposed approach to governance deliver clear and transparent accountability to operate an effective qualifications framework for CTSI?
2. Are the roles and responsibilities outlined for Council and Executive appropriate, clear and comprehensive? Are there others that should be considered?
3. Are the proposals for a Qualifications Board (QB) appropriate to deliver effective and inclusive governance of the qualification's framework?
4. Which organisations should be represented on the QB?
5. Are the proposals for an Examinations and Assessment Board (EAB) appropriate to deliver robust challenge and oversight of the examinations, assessment and awards processes?
6. Do the EAB proposals provide confidence in the Institute's arrangements for examinations and assessments?
7. Should the EAB consider appeals?
8. Is it appropriate for the EAB to have delegated responsibility from Council to make awards?
9. Are there other factors or considerations we should take account of in making changes to the governance arrangements that would improve confidence and transparency?

Qualifications model and framework

The current CTSI professional competency framework (CPCF) can be found using the following link:

[CPCF details and announcement \(tradingstandards.uk\)](https://www.tradingstandards.gov.uk/cpcf)

Points for consideration.

Substantial changes were made to the CTSI qualifications framework in 2019. The main impact of these changes was to move away from the modular design that enabled learners and their employers to select specific areas of study and assessment to an approach that was more prescriptive. Take up of the revised framework has been low and while there are many reasons for the declining number of learners, employers report a lack of flexibility and inclusiveness in the framework. This could be a significant factor in the current low levels of participation.

Feedback shows that the requirement for legal metrology to be a core area of study and assessment coupled with the limited technical study options at stage 2 may have presented challenges to participation. An additional Legal Metrology module had to be developed for Northern Ireland students to allow them to study for stage 2.

Is the current requirement for study of legal metrology acting as a barrier to learners participating in the broader qualification's framework, particularly at stage 2 involving the higher-level skills and competencies? Does it impose unnecessary costs on employers who already have enough staff that hold qualifications and competency in legal metrology? Does its inclusion risk the Institute's commitment to diversity and inclusion and the way we demonstrate how we value all those that work in trading standards roles?

Additional qualifications that sit outside the core framework to fill gaps and to meet employer's demands for officers to be able to demonstrate competence in specific technical areas have been established. For example, another board was set up, the Competencies

and Structures Board (CSB) to develop further competency courses that do not now sit within the CPCF. This board has recently approved a Product Safety qualification for Northern Ireland and an Animal Health & Wealth qualification. Learners undertaking these specific qualifications are currently awarded either a certificate of competence or qualification. Is it sufficiently clear how these relate to the core qualifications framework or how learners gain credit for these in the Institute's qualifications?

What changes are proposed?

Trading standards roles are largely focussed on understanding and changing the behaviour of businesses and individuals to improve outcomes for consumers, the places they live and the broader environment, including the business environment. These interactions take place within the framework and powers established by the law and numerous specific regulations. Trading standards professionals work in a variety of organisational contexts and their roles focus on applying the rules, by regulating businesses, products, transactions, and processes. They need a range of skills and competencies: to gather data, information, intelligence and evidence; to carry out assessment and analysis to determine risk; to consider what interventions will be appropriate to achieve the outcome and to influence behaviour and investigate issues – the 'how'. In addition, they need technical and legal knowledge of the context they are working in and the specific subject and requirements they are applying these broader skills and competencies to – the 'what'.

The headlines of the proposals are as follows:

1. to more closely align the model to 'the how' and 'the what';
2. enable learners to be awarded a standalone 'Certificate' on successful completion of stage 1 of the model;
3. widen the study options at stage 1 to include additional technical subjects in addition to 'fair trading'; (Note: the additional technical subjects would be studied at level 5.)
4. fully recognise the Regulatory Compliance Officer Apprenticeship (RCO) programme within the model - provide credit for units 1 and 2 on successful completion of the RCO;
5. remove the requirement to study 'legal metrology' in stage 2
6. increase the technical study options in stage 2;

These represent a set of proposals for a series of evolutionary not revolutionary changes to the current model and framework. They are designed to deliver flexibility for learners and employers. This recognises that many trading standards roles, at the entry level to the profession, are often narrow and focussed. Designing a framework that encourages participation by professionals at the start of their career in Trading Standards seeks to improve the relevance of the qualification's framework and the Institute among all those working in trading standards and beyond. The proposed revisions to the framework would enable employers and learners to take full advantage of the Government funded Apprenticeship programme and see a clear route as to how it integrates with the framework. The proposed model would also enable learners and employers to add additional areas of technical study, more advanced skills and competencies as individual's roles and careers change and develop, improving inclusiveness and opportunity.

Legal metrology

The role and significance of legal metrology in trading standards qualifications is for some Institute members a totemic issue. However, a significant number of trading standards roles do not involve legal metrology and for roles that do involve legal metrology, it is rarely the totality of the role. The changes made to the qualification's framework following the review

started in 2014 meant that for a learner to achieve an award at stage 2 and obtain the Trading Standards Practitioner Diploma they are required to study legal metrology. This is also linked to the learner's access to becoming a full member of CTSI.

While there remains a need for some trading standards professionals to have the high levels of technical, scientific, and legal knowledge to undertake legal metrology functions, this does not apply across the board. The proposed changes do not mean the Institute does not continue to value legal metrology, the history and positive influence it has had on our profession. However, it is proposed that the time is right to introduce changes and build a qualification's framework for the future that continues to recognise the importance of legal metrology but also enables learners and employers to engage in a qualification that is flexible to their needs and values all the other important work that trading standards professionals are engaged in.

CTSI has had initial conversations with the Office for Product Safety and Standards (OPSS) who administer the Secretary of State's responsibilities under Section 73 of the Weights and Measures Act in respect of the qualifications and appointment of Weights and Measures Inspectors. CTSI and OPSS have formed a partnership to work collaboratively on competency-based learning and development for trading standards professionals, including how we jointly deliver the legal metrology aspects of the qualification's framework and the requirements under Section 73.

Views are sought on how the legal metrology qualifications should continue to be delivered under the qualifications framework and whether there is value and interest in splitting the legal metrology unit into two parts. CTSI and OPSS recognise that the current legal metrology unit is large and contains a range of content – some of which is simple through to the highly complex and technical.

There is a continuing need for officers in every local authority to be able to interface with local businesses about weights and measures issues. These officers will need a level of technical knowledge and skills to make checks on the types of weights and measures equipment in common usage. It is recognised that to carry out verifications of complex equipment and provide advice to manufacturers and packers requires high levels of technical and legal knowledge. Are there benefits in concentrating this knowledge and expertise in a smaller number of officers who are more regularly involved in doing this type of work?

Suggested DRAFT Qualification Stages

On successful completion of all units under Stage 1 candidates would be eligible to be awarded The Trading Standards Practitioner Certificate (TSPC)

UNIT 1	Regulatory Environment & Enforcement	2-hour written exam	2,000 - word reflective statement
UNIT 2	Business & Consumer Legal Frameworks	2-hour written exam	2,000 - word case study
UNIT 3: Candidates choose one option from:	Candidates choose one option: Fair Trading Weights & Measures Part 1 Food Standards Feed Product Safety Animal Health	2-hour written exam	2,000 - word report OR Practical, Oral exam Portfolio (depending on subject)

On successful completion of all units under Stage 2 candidates will be awarded:
The Trading Standards Practitioner Diploma (TSPD)

UNIT 4: Candidates select two options from:	Weights & Measures Part 1		Practical and Oral exam Portfolio
	Weights & Measures Part 2	2-hour written exam	Practical and Oral exam Reflective statement Professional interview Portfolio
	Food Standards	2-hour written exam	Oral exam Portfolio
	Feed	2-hour written exam	Oral exam Portfolio
	Fair Trading	2-hour written exam	Oral exam Portfolio
	Animal Health	2-hour written exam	Oral exam Portfolio
	Product Safety	2-hour written exam	Oral exam Portfolio
UNIT 5	Investigations		Portfolio Professional interview
UNIT 6	Regulating Markets		Portfolio Professional interview

Questions for discussion on the Model

1. As an employer -, would the proposed model deliver the flexible approach that you could use in your organisation to develop existing staff and recruit new entrants?
2. As a prospective learner -, would the proposed model enable you to participate in the profession's qualification that would have relevance to your job role?
3. As a training provider - would the proposed model enable you to develop course content and learning programmes to deliver to?
4. Do you see the value in learners being able to achieve a qualification at the successful completion of stage 1 of the framework?
5. Does the proposed stage 2 provide adequate flexibility to reflect current trading standards roles?
6. Do you see value in further exploring with OPSS splitting legal metrology into two parts?
7. What aspects of legal metrology would best be delivered in part 1?
8. What aspects of legal metrology would best be delivered in part 2?
9. Other suggestions are welcome to make the qualifications framework and model more inclusive, relevant and flexible for employers and prospective learners.

Delivery

Does the administration and delivery of the qualification's framework need review?

The current practical operation of the qualifications relies on many manual processes that might lead to errors in delivery, including in the granting of awards. Confidence in robust administrative processes and practices lie at the centre of any successful qualification's framework. Any failure in these might have significant consequences for the Institute's reputation and credibility.

Local Authority training budgets remain under extreme pressure. Heads of Service in England report they have used the apprenticeship levy for training. The delivery of the CPFC may not be able to rely only on direct funding from local authorities in the future. Is it timely to explore a delivery of the CPFC alongside the delivery of relevant Apprenticeships that would deliver for employers and provide a sustainable qualification?

What is proposed?

CTSI will make improvements to its examinations, assessment and awards processes and procedures and make an investment in appropriate IT infrastructure to underpin these.

Establishment of appropriate arrangements to quality assure the materials used and the competency and capability of those delivering CTSI qualification training delivered as part of the framework.

To note: A higher-level apprenticeship is being put together that proposes to map and align itself with Stage 2 and 3 of CPFC. This would have the distinct advantage of helping to build sustainability for the CPFC.

For discussion on Delivery

Your suggestions and recommendations would be valued to make sure the delivery of the Qualifications is robust to encourage confidence in its administrative processes and practices.

Also, your suggestions and recommendations to make ensure the establishment of appropriate arrangements to quality assure and to improve the delivery of the Qualifications training.