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run *by* counsellors
for counsellors

2024 - 2025

CPCAB Internal Assessment Appeals and Complaints Guidance for Centres



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1. Introduction

We hope that every learner enjoys their training experience and every centre is able to provide the service they wish to. However, we understand that disagreements happen and we want to help you offer a fair and supportive process to deal with these disagreements.

Registered candidates are entitled to make an appeal against an internal assessment decision and they can also make a complaint about any aspect of their learning experience that they find unsatisfactory. Centres must have published internal assessment appeals and complaints processes which are available to learners, usually as part of their student handbook.

These disagreements tend to fall into two categories:

Complaints

Learners may raise a complaint about any aspect of their learning experience which they feel has fallen short of their expectations. Any complaints process must be fair to the learner and include at least one person who is independent of the complaint and competent to make a fair judgement on the complaint. It is not acceptable to offer a process where those involved have a vested/personal interest or are too closely linked with the person being complained against e.g. a family member, close friend or colleague.

Internal Assessment Appeals

Learners can appeal against an internal assessment decision if they believe that the processes and procedures which led to this decision have been unfair or discriminatory in some way (not just because they disagree with the decision). A staged process, similar to that of complaints, is advised. However, the person making the decisions should be a subject specific specialist who is suitably qualified to make an accurate judgement on the work which is under scrutiny.

If you are a centre that is new to CPCAB you will need to provide a robust complaints policy and assessment appeals policy as part of your centre recognition process. If you make significant changes to your complaints policy or internal assessment appeals policy after recognition, we recommend resubmitting these to CPCAB for review before making them available to candidates. This ensures that both centres and candidates can continue to be assured that they are fit for purpose.

2. Complaints Guidance

It is typical for a complaints policy to identify its scope and purpose, including a definition of a complaint, and the centre's commitment to handle complaints fairly and promptly. It is wise to include your typical timeframes for responding to a complaint, and acknowledge where timeframes may need to be extended, for example in the case of complex complaint with multiple strands to address. We would expect a complaints policy to include a minimum of three stages and the following suggested text may be useful in composing/reviewing your own complaints policy:

Stage 1: INFORMAL: *If possible, you should try to resolve your complaint informally by discussing it with the person concerned or with your tutor.*

Stage 2: FORMAL COMPLAINT: *If you are not satisfied with the outcome of Stage 1 or if Stage 1 is not appropriate for your circumstances, you should put your complaint in writing to (named person). Your complaint will be investigated, and a written response given within (28) working days.*

Stage 3: COMPLAINT APPEAL: *If you are not satisfied with the outcome of Stage 2 and want to appeal the decision you should raise your appeal in writing with supporting evidence to substantiate your reason for appeal within (14) working days of the outcome of Stage 2. The complaint processes and procedures will be reviewed by a panel made up of people not involved with the complaint including an independent person. A final written response will be given within (28) working days. This decision is final.*

If you feel at the conclusion of this process that your complaint has not been properly handled in accordance with this policy, you may raise this for review with the awarding organisation CPCAB www.cpcab.co.uk

(end)

When applying to become a CPCAB approved centre, your complaints policy will be reviewed for its suitability by a CPCAB Counselling Qualifications Professional; should you later introduce changes to your approved policy you will need to submit the revised version for approval as well, without delay. There is no charge for this process.

Whilst CPCAB is obliged to ensure that centres have robust appeals and complaints procedures in place, we normally have no role in individual centre complaints. However, should a complaint against a centre progress through all stages, including the appeals stage, without a satisfactory resolution, and it is requested by the complainant, we are obliged to review the centre's handling of the complaint to ensure that the centre has followed its published procedures and CPCAB guidelines appropriately, and that there has been no malpractice or serious maladministration relating to the CPCAB qualification.

Managing complaints can be very demanding physically, emotionally and financially. You cannot charge for complaints to be investigated so you will need to ensure you have systems in place to accommodate these processes. Providing learners with adequate course information and employing a robust selection process will ensure learners access the course that is right for them. This will minimise the risk of complaints further down the line.

Common causes of complaint against a centre include:

- Failure to assess an individual's learning needs and apply appropriate reasonable adjustments, either in the classroom or for assessments
- Providing fewer than the advertised number of guided learning hours
- Breakdown of relationship between tutor(s) and learner or challenging classroom interaction that is not sufficiently managed by the tutor(s)

- Learners being withdrawn from a course without clear explanation, or where this has not been documented or discussed
- Course cancellations or disruptions to learning caused by tutoring arrangements falling through without sufficient centre contingency
- Learners being assessed as not-proficient due to contraindications (which should be addressed through the centre's IA appeals process)
- Disagreements over the outcome of internal assessments (which should be addressed through the centre's IA appeals process)

Factors that increase the likelihood of a positive outcome from a complaint:

- Clear and prompt response from a centre and a readily available centre complaints policy
- Willingness to engage in early discussions with a complainant to work to mediate and resolve the complaint before it becomes formal
- Well documented processes and decision making (if a complaint is escalated to CPCAB we will ask to see this)
- Evidence of where a centre's own published processes have been followed and legislation, such as equalities legislation, has been upheld
- Willingness to acknowledge where failings have occurred, and taking appropriate action including reparative steps, if it is possible to do so without invalidating the award of the qualification

3. Internal Assessment Appeals Guidance

It is typical for an internal assessment appeal policy to identify its scope and purpose, including the definition of an appeal, and the centre's commitment to handle appeals fairly and promptly. It is important to include your typical timeframes for responding to an appeal, and acknowledge where timeframes may need to be extended, for example in the case of complex appeals with multiple strands to address. We would expect an appeals policy to include a minimum of three stages and the following suggested template may be useful in composing/reviewing your own appeals policy.

Timeframes and text are suggested only, and centres are able to compose a policy which fits the remit of the centre, so long as it provides a fair opportunity to appeal. It is not unusual for a centre to make a nominal charge to a candidate for raising an assessment appeal, however this fee should be clearly published and returned to the candidate if the appeal is upheld.

Below is a suggested template for centres. [Blue text is provided as guidance for centres and should be removed before using the template to draft/review your own policy.](#)

Template - Internal Assessment Appeals Policy

Scope

(Centre Name) is committed to achieving the highest of professional standards based on impartial, reliable and valid assessment judgments when assessing candidate work submitted for the purpose of achieving a CPCAB qualification. Whilst we endeavour to execute our responsibilities with openness and fairness there may be times when candidates wish to question assessment decisions.

(Centre Name) is committed to ensuring that candidates' work is assessed by staff who have appropriate knowledge, understanding and skill, who have been trained in this activity, and are approved by the awarding organisation as a tutor for the qualification. Whenever its staff mark candidates' work this is done fairly, consistently and in accordance with the awarding organisation's specification and associated documents. Where more than one tutor is involved in marking candidates' work, internal quality assurance processes and standardisation will ensure consistency of marking.

This policy scope covers assessment decisions made by centre tutors in relation to Internal Assessment of CPCAB qualifications only. Internal Assessment decisions remain a centre responsibility, and appeals are carried out by the centre. CPCAB does not have a role in conducting Internal Assessment appeals.

This policy does not cover assessment decisions made externally, for example CPCAB External Assessment (exams), which are dealt with directly by CPCAB.

This policy scope does not cover disagreements about other aspects of a candidate's learning experience, which should be addressed via the centre complaints policy.

Purpose

The purpose of this policy is to acknowledge the right to appeal of all candidates who feel disadvantaged by an assessment decision they believe to be incorrect and to clearly identify the process of appeal.

Definition

Appeals allow registered candidates to question an assessment decision. An appeal is a process through which the outcome of an assessment decision may be challenged.

Centre Responsibilities

To protect the interests of all candidates and the integrity of the qualification (Centre Name) will:

- *inform the candidate at induction, or via the use of a Student Handbook, of the internal assessment appeals policy.*
- *ensure that candidates are provided with formative assessment feedback throughout the course, and are informed of their internal assessment outcomes so that they may submit an appeal before results are submitted to the awarding organisation.*

- *operate a clear and staged appeals procedure.*
- *provide a clear deadline for candidates to submit a request for an appeal. Requests will not be accepted after this deadline.*
- *allow sufficient time for the appeal to be carried out, and to make any necessary changes to the assessment.*
- *ensure that any review of marking is conducted by an assessor who has appropriate competence, has had no previous involvement in the assessment of that candidate for the component in question and has no personal interest in the outcome of the review.*
- *ensure that any review of marking checks that the candidate's assessment is consistent with the standard set by the centre, and consistent with the awarding organisation's specification and associated documents.*
- *inform the candidate in writing of the outcome of the appeal.*
- *keep appeals records for review by the awarding organisation.*
- *take appropriate action to protect the interests of other candidates and the integrity of the qualification, when the outcome of an appeal questions the validity of other results.*
- *monitor appeals to inform quality improvement.*

Candidate Responsibilities

- *familiarise themselves with the centre's appeals policy.*
- *inform the centre of their intention to appeal at the earliest possible opportunity, and raise an appeal before any centre appeal deadline has passed.*
- *make an appeal request in writing and candidates must explain on what grounds they wish to request an appeal.*
- *Follow the staged process for appeals provided by the centre.*

Grounds

Where a candidate questions an assessment decision they should identify grounds for an appeal. Appeals against internal assessment decisions for CPCAB qualifications typically fall into three categories:

1. *An appeal questioning the standard/level of tutor assessment of evidence submitted by a candidate to meet the specified Assessment Criteria.*

CPCAB guidance to centres

In cases of appeal in this category it is typical to:

- *conduct a remark/review of the tutor assessment, (or a sample of), to check that assessment levels are consistent with the standard of the centre and consistent with the awarding organisation's specification and associated documents.*

- these may be cross checked with External Verification reports from CPCAB and centre IQA records to check that assessment standards are within expected levels.
 - It should be made clear to the re-marker/reviewer, the tutor(s) and the candidate that no-one is permitted to alter the work, or add new assessment material/evidence after the initial tutor(s) have provided a result to the candidate.
 - The reviewer should provide, in writing, a reason for upholding or changing any part of the assessment outcome awarded by the tutor(s).
2. *An appeal questioning the application of contraindications, or the tutor(s) overall decision of proficiency, at the conclusion of the course.*

CPCAB guidance to centres

In cases of appeal in this category it is typical to review:

- the documented history of potential for contraindications, failure to achieve the Learning Outcomes/Assessment Criteria, or failure to meet any identified action plans/deadlines provided by the tutor(s).
 - any evidence provided by a candidate's placement agency, supervisor, personal therapist which supports a case for contraindications (where applicable).
 - any evidence provided by the candidate to demonstrate tutor bias or malpractice.
3. *An appeal questioning the application of assessment requirements, or reasonable adjustments in internal assessment.*

CPCAB guidance to centres

In cases of appeal in this category it is typical to review:

- documentation relating to any learning contract, assessment schedule, Student Handbooks, or other guidance provided on assessment requirements.
- the documented history of any requests for reasonable adjustments, including any initial assessments of need.
- any evidence provided by the candidate to demonstrate a misapplication of the assessment requirements or failure to respond to requests for reasonable adjustments.

Process

Stage 1 – INFORMAL: *the candidate consults with their tutor(s) within a period of 2 weeks following an assessment decision, to raise an enquiry and discuss the assessment decision. If this informal stage does not resolve the enquiry, then the issues are documented before moving to stage 2.*

Stage 2 – APPEAL: *the candidate must raise an appeal request in writing within a period of 2 weeks following the Stage 1 discussion. The grounds for appeal are reviewed and where appropriate a review/re-mark of assessment decisions takes place by an individual suitably*

qualified to make an assessment decision for that qualification. The candidate will be notified of findings and is required to agree or disagree, in writing, with the outcome within a period of 1 week. If unresolved, move to stage 3.

Stage 3 – APPEAL HEARING: *A panel (people not previously involved and without a personal interest in the outcome) will hear the appeal within a period of 2 weeks of the candidate's written response. The grounds for appeal, any remarked assessments and any supporting documentation will be reviewed to determine if the initial outcome is to be upheld or overturned. This will be communicated to the candidate in writing within 2 weeks. The decision of the stage 3 appeal hearing is final.*

Recording appeals: each stage will be recorded, dated and show either agreement or disagreement with decisions.

(end)

Positive Indicators

Examples that would suggest a centre has robust assessment systems and suitable internal assessment appeals process in place.

The centre/tutor(s):

- Have in place clear and comprehensive group/learning contracts with candidates which outline the assessment requirements, and the consequences of a candidate not fulfilling their responsibilities.
- Have in place clear assessment schedules and deadlines which are available to, and understood by, candidates.
- Have in place robust Internal Quality Assurance (IQA) processes which support the standardisation of tutor assessment decisions over time and across cohorts.
- Make use of CPCAB formative assessment templates (or have designed their own) to clearly document and communicate the progress of candidates, including areas for development and the tracking of concerns that may indicate a contraindication, e.g. tutorial records, Self-Reviews, CAS sheets.
- Engages with the CPCAB External Verification and Independent Verification processes. Putting into action any identified areas for development and utilising EV/IV feedback to ensure consistency of assessment standards.
- Attend CPCAB standardisation events in line with the minimum attendance and cascade requirements.
- Have in place an internal assessment appeals policy for the benefit of learners which includes a staged appeals process.
- Have in place an internal assessment appeal process which includes suitably qualified individuals without a personal interest in the outcome of an appeal. For this reason it is likely not appropriate for a centre manager/owner to conduct an appeal re-mark/review unless they are also a trained tutor and have no conflict of interest resting on the outcome of the appeal, e.g. financial or reputational.

Negative Indicators

Examples that would suggest an internal assessment appeals policy is not suitable or puts a centre at risk of assessment decisions being questioned and potentially overturned via the appeals process.

The centre/tutor(s):

- Have no written agreements with candidates outlining the schedules for assessment or potential impact of failing to meet the minimum requirements.
- Have IQA processes and schedules but do not follow them.
- Do not have an accessible internal assessment appeals policy, or a fully understood internal assessment appeals process.
- Have an internal assessment appeals policy but fail to follow it.
- Fail to document the progress of individual candidates, do not keep records of tutorials, or communicate to candidates where they may have concerns about their potential to gain a proficient outcome, or communicate potential contraindications.
- Use outdated CPCAB Tutor Guides, Candidate Guides and associated assessment documentation.
- Does not engage with the CPCAB EV/IV processes, or fails to share EV/IV feedback with tutors.
- Falls below minimum attendance requirements for CPCAB standardisation.
- Appeals processes/re-marks/reviews are conducted by individuals with a personal interest in the outcome.
- Appeals processes/re-marks/reviews are conducted by individuals who are not suitably qualified or who do not understand the qualification or assessment processes.
- Appeals for internal assessment are referred directly to CPCAB, who are not able to take a role in internal assessment appeals.

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