



**HFMA Qualifications**

Qualifications in healthcare business and finance



# **The HFMA Awarding Organisation advanced learner handbook**

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## Foreword

As the Head of The HFMA Awarding Organisation I am delighted to welcome you to the HFMA Qualifications.

This Learner handbook is intended to give you a clear understanding of what to expect from The HFMA Awarding organisation and its staff and to outline what we expect of you as a learner. Perhaps the most important point is that we recognise you are independent, adult learners with professional work roles and we respect that you will wish to make your own decisions about how and when you study.

Our central administration and technical support teams are also available to help you when necessary.

Good luck with your studies.

Jayne Rowland

Head of Awarding Organisation

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# HFMA qualifications

## Introduction

The HFMA has developed a set of qualifications specifically focussed on business and finance in healthcare, providing a unique opportunity to explore and examine how finance works in the NHS at both a local and national level. These qualifications are aimed at a wide range of learners including finance staff, healthcare professionals, general managers, clinicians, GPs, practice managers and non-executive directors. They are also relevant to individuals working outside the NHS.

The HFMA qualifications have been designed to:

- (a) align to HFMA's vision, mission and strategic objectives;
- (b) be in line with the HFMA's qualifications development manual following its processes for ensuring qualification validity, reliability, comparability, manageability and minimising bias;
- (c) provide a learning opportunity which will give all learners a fair and reasonable chance of achieving the academic standards required for successful completion;
- (d) ensure that the final programme content and assessment methods are inclusive and are in line with the HFMA equality and diversity policy and are accessible to learners with protected characteristics (Equality Act 2010)
- (e) take into account feedback from key stakeholders such as learners, qualifications experts NHS professionals and professional and statutory bodies

These qualifications are designed to meet requirements at a post-graduate level (level 7), although learners do not have to be graduates to embark at any stage.

As of May 2018, HFMA Awarding organisation has one delivery centre which delivers content for the qualifications. Further details on the delivery methods and dates for programme start dates are available at from the HFMA Academy details on the HFMA website.

# Learner's handbook

## HFMA Level 7 qualifications structure

Qualifications	Structure	Credits	Entry Requirements
HFMA Advanced Certificate in Healthcare business and finance	Choice of six optional and one core module  Learners can complete a maximum of two individual certificates	20 (per module)	Demonstration of ability to work at masters-level (through application form)
HFMA Advanced Diploma in Healthcare business and finance	core module  choice of two optional modules  Learners must successfully complete three x 20 credit modules. Any of the modules can be selected but one of these must be the core module.	60 (cumulative)	Anyone who can demonstrate through their application that they can study at master's level. If you have less than two years' experience in healthcare, you will need to complete the level 7 core certificate first
HFMA Advanced Higher diploma in Healthcare business and finance	Choice of three optional modules  Learners must successfully complete a further three 20 credit modules in addition to the three modules that they completed at the diploma stage (six 20 credit modules in total)	120 (cumulative)	Successful completion of HFMA Diploma (60 credits) <i>or</i> CCAB or CIMA qualified accountants with at least two years recent post-qualification experience in healthcare or a related field will automatically be awarded a 60-credit transfer and will therefore be eligible to gain direct entry to the Higher Diploma. Learners in this category can choose to study three modules from the optional modules available

## Eligibility for credit transfer

Professionally qualified accountants\* with at least two years recent post-qualification experience in healthcare or a related field may be eligible to be awarded a 60 credit transfer and gain direct entry to the Higher Diploma. Learners in this category can choose to study three modules from the optional modules available (currently O1-5). However, they cannot choose module C1.

\*Professionally qualified accountants must be fully qualified members of any of the following professional accounting bodies:

- CIMA
- CIPFA
- ACCA
- ICEAW, ICAS

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### Compulsory and optional modules

Modules		Credits
Core	L7C1: How finance works in the NHS	20
Optional	L7O1: Managing the healthcare business	20
	L7O2: Personal effectiveness and leadership	20
	L7O3: Tools to support decision making	20
	L7O4: Creating and delivering value in healthcare	20
	L7O5: Comparative healthcare systems	20
	L7O6: Supporting quality care with patient level costing	20

## Module specifications

The following pages outline the content, the learning outcomes and the assessment activity required for each of the HFMA modules in Healthcare business and finance. Each of the modules is offered at Level 7, each has 20 credits attached to it, and the total qualification time for each module is 200 hours.

### Module L7C1: How finance works in the NHS

Level 7, 20 credits

Total Qualification Time: 200 hours

In a rapidly changing NHS, this module gives the context for understanding healthcare business and finance. This is key to recognising how finances and financial pressures can affect patients. The NHS must do things differently – this means working increasingly closely with social care, finding new ways of delivering care and, in England, the urgent implementation of the Five Year Forward View. This module will help learners to understand who does what and why in the NHS and how the money flows from HM Treasury to NHS organisations. It will also provide insight into what needs to change and the barriers to making that happen.

#### Module content:

- NHS finance – structure, funding, revenue and capital allocations and reimbursement
- Understanding of how the four home nation systems compare and contrast
- NHS service planning, joint working across local health economies
- Primary care finance
- The provider financial regime
- Integration of the various health services and their relationship with social care.

	Learning outcomes. The learner will...	Assessment criteria The learner can...
C1.1	Critically analyse and evaluate the ways that healthcare in the UK is structured and funded	<ul style="list-style-type: none"> <li>• Critique the linkage between politics, Government policy including taxation and the NHS</li> <li>• Assess the current financial challenges of the NHS</li> <li>• Describe the internal market for healthcare in the NHS in England</li> <li>• Evaluate the role of commissioners in the internal market</li> <li>• Critically appraise the process of commissioning</li> <li>• Appraise the primary care system in the NHS in England</li> </ul>

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		<ul style="list-style-type: none"> <li>• Critically examine the role of NHS and private providers operating in the NHS internal market</li> <li>• Critically evaluate the work of arms length bodies and how they exert overall control on the system</li> </ul>
C1.2	Critically appraise how the English system compares with that of other home nations	<ul style="list-style-type: none"> <li>• To understand the origins of the NHS</li> <li>• Critique how the health service operates in each of the three devolved nations</li> <li>• Critically compare the structure of the NHS in devolved nations against that in England</li> <li>• Evaluate the integration agenda in England and the devolved nations</li> </ul>
C1.3	Evaluate the approach taken by the NHS to revenue and capital allocation	<ul style="list-style-type: none"> <li>• Compare and contrast the difference between revenue and capital funding</li> <li>• Critically appraise the separate planning processes for revenue and capital</li> </ul>
C1.4	Research, assess and critique the strengths and weaknesses of funding flows within a local health economy	<ul style="list-style-type: none"> <li>• Appraise how funding moves through the NHS system</li> <li>• Critically evaluate the contracts and payments system operating between NHS providers and commissioners</li> <li>• Appraise the funding of local government and social services</li> </ul>
C1.5	Critique how finance works within the NHS in the UK and recommend improvements to the current system.	<ul style="list-style-type: none"> <li>• Appraise the linkage between taxation and the funding of the NHS</li> <li>• Critique the health and social care integration agenda</li> <li>• Critically evaluate the link between social care funding and the funding of healthcare</li> </ul>

### Assessment process:

Learners will complete an assignment with a total word count of 4000 words based on a local health economy within the UK.

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## Module L7O1: Managing the healthcare business

Level 7, 20 credits

Total Qualification Time: 200 hours

In the NHS today there is increasing demand and greater patient and public expectations, but this usually comes at a higher financial cost. Indeed, many healthcare providers are running significant deficits. However, the public sector cannot continue to spend more money than it has available without significant system-wide consequences. When having to 'do more' with no additional resources, managing the money that is available efficiently and effectively is vital in demonstrating that public money has been used wisely and well, for its intended purpose. All public sector organisations have a duty to plan how their resources will be used to meet their objectives and an accountability to report what actually happens to the Government and the public.

This module will help learners to understand how planning, reporting and governance arrangements in the NHS help organisations to: establish an agreed way forward; set aims and objectives, how these will be achieved and by when; develop a framework for day-to-day decisions; and be accountable for their performance.

### Module content:

- Introduction to business finance and planning
- Introduction to interpreting accounts and costing
- Business and financial challenges and planning
- Facilitating approaches to budgets and financial analysis
- Charitable funds
- Attaining a micro perspective on financial accounting
- Attaining a macro perspective on financial accounting
- Local collectivised governance and audit
- Governance models and their effectiveness
- Risk management and assessment framework.

	Learning outcomes. The learner will...	Assessment criteria The learner can...
O1.1	Critically evaluate the strategic and operational financial planning and budget management within a healthcare organisation in the UK	<ul style="list-style-type: none"><li>• Evaluate the essential elements of the NHS business planning process</li><li>• Critically evaluate the effectiveness of the budget systems in your local NHS organisation and another NHS organisation</li></ul>

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		<ul style="list-style-type: none"> <li>• Critically evaluate how forecasting aids effective decision-making within an NHS organisation within the UK</li> <li>• Critically analyse charitable funds annual accounts, comparing them with the previous year's and reflecting on the variances and the reasons behind them</li> <li>• Critically evaluate the economic benefits of various types of investment</li> <li>• Assess the main financial risks locally and their management</li> </ul>
O1.2	Critically analyse the effectiveness of financial management in healthcare organisations across the UK	<ul style="list-style-type: none"> <li>• Assess the financial challenges in the NHS and how these might affect your local organisation</li> <li>• Compare and contrast the financial performance of your local healthcare organisation with one other healthcare organisation in the UK</li> <li>• Based on a critical appraisal of how cash flow is managed in either your organisation or another local NHS organisation and recommend improvements to cash flow</li> </ul>
O1.3	Critically compare the annual report and financial accounts of healthcare organisations across the UK	<ul style="list-style-type: none"> <li>• Critically evaluate, compare and contrast the financial performance within your local healthcare organisation and one other</li> <li>• Critically appraise an NHS annual report and accounts, including how alignment with the organisation's strategic objectives and recommended improvements</li> <li>• Use trend analysis and accounting ratios to critically analyse the movements between two year's NHS annual accounts</li> </ul>
O1.4	Evaluate the effectiveness of governance policy, structure and processes in a healthcare organisation in the UK	<ul style="list-style-type: none"> <li>• Recommend areas for improvement following review of a local NHS governing body or board report</li> </ul>

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		<ul style="list-style-type: none"> <li>Using recommended actions from an NHS inquiry, critically analyse the extent to which recommended actions have been embedded in your own organisation and/ or other local provider organisations</li> </ul>
O1.5	Evaluate risk management techniques and develop risk management strategies, including recommending how risks can be identified and managed more effectively	<ul style="list-style-type: none"> <li>Compare risk management techniques and strategies</li> <li>Evaluate the impact on healthcare organisations of a key risk not being effectively managed</li> <li>Formulate recommendations for improved risk identification and management techniques in an identified healthcare organisation</li> <li>Formulate a strategy to manage any significant risks that have been omitted from local risk management identification</li> </ul>

### Assessment process:

Learners will complete a 4,000-word portfolio based assessment.

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## Module L7O2: Personal effectiveness and leadership

Level 7, 20 credits

Total Qualification Time: 200 hours

Leaders and aspiring leaders in today's NHS face immense challenges that require particular personal and professional characteristics. As part of the management structure, faced by multiple and competing demands and priorities and as pressure on public finances increases, innovative approaches, drive and the ability to make things happen are paramount.

In a world of media, regulator and public scrutiny, this module will help the learner to greater self-awareness, an understanding of approaches to personal effectiveness and leadership in order to support the overriding objective of the NHS to deliver high quality care for all.

### Module content:

- Different leadership theories and approaches
- Leadership in context
- Leadership competencies and behaviours
- Motivation and handling conflict
- The role of communication
- Presenting effectively
- Managing teams
- Approaches to influencing
- Self-management and prioritisation
- Commitment and confidence

	Learning outcomes. The learner will...	Assessment criteria The learner can...
O2.1	Assess, critically evaluate and reflect on how the performance and delivery of services by an organisation can be affected by:  a. The influence and role of leaders and individuals  b. Leadership styles, competencies and behaviours  c. Approaches to communication  d. Strategies to engage, motivate and performance manage teams	<ul style="list-style-type: none"><li>• Formulate criteria which define an effective leader</li><li>• Evaluate alternative leadership styles in different situations</li><li>• Evaluate strategies to manage the engagement, motivation and performance of your team</li><li>• Appraise the causes and types of conflict and ways of resolving them</li><li>• Appraise communication techniques and evaluate the link between communication and culture</li></ul>

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	<p>and individuals</p> <p>e. Sources of conflict and resolution techniques.</p>	<ul style="list-style-type: none"> <li>• Apply techniques to construct an effective presentation based on analysis of audience needs</li> <li>• Appraise the factors that make a team work well, what can go wrong in a team and what leaders can do to improve team working</li> <li>• Critique personal effectiveness and its effectiveness in leadership</li> <li>• Evaluate the importance of influencing and the various approaches to influencing that leaders can use</li> </ul>
O2.2	Critically evaluate and reflect on their leadership style, personal effectiveness and leadership skills	<ul style="list-style-type: none"> <li>• Design a competence framework for your own position and assess your competence against it</li> <li>• Evaluate how leadership culture and style affect healthcare delivery</li> <li>• Prepare a plan to develop own leadership skills based on own competence framework assessment</li> <li>• Formulate an action plan to improve your own personal effectiveness at work</li> </ul>

### Assessment process:

Each learner is required to complete an assessment based on his/her personal effectiveness and/or leadership in a current/ recent work context. This will require creation of a personal development plan (not submitted) on which the learner must draw in writing the assessment.

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## Module L7O3: Tools to support decision-making in healthcare

Level 7, 20 credits

Total Qualification Time: 200 hours

Better data and better use of that data are vital in a complex healthcare system needing to deliver more for less year on year. Data is used to improve services, better understand patient needs, support new payment approaches and to plan, monitor and manage performance. To determine the best course of action and what is best for the patient, both for individual and organisational decisions, high quality data is needed and needs to be used. All decisions should be well-informed - for example, at what point should a service be 'switched off'? Is a service or an organisation operationally and financially sustainable? Which pathway of care is best for this person?

This module will enable the learner to examine tools to support decision-making in terms of information, data, performance indicators and benchmarking – the NHS is underpinned by a plethora of data, not all of which is used to maximum advantage.

### Module content:

- Information systems and how they can support decision-making in healthcare
- Primary sources of comparative data and other valuable information
- Compiling and presenting information
- Performance indicators and benchmarking
- Investment/ disinvestment process and governance
- Business planning tools
- Ethical and professional considerations
- Negotiating and managing internal and external relationships.

	Learning outcomes The learner will...	Assessment criteria The learner can...
O3.1	Critically analyse the information systems and information available within a local health/ health and social care economy	<ul style="list-style-type: none"><li>• Appraise the need and availability of comparative data to enable sound decisions to be made</li><li>• Appraise how aggregated data is used for planning purposes as well as costing and pricing</li><li>• Interpret the application of policies and regulations that protect patient data</li><li>• Critique the differences between strategic and operational plans as they interact to improve services to patients</li></ul>

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O3.2	Evaluate the effectiveness of information systems in supporting decision-making in healthcare	<ul style="list-style-type: none"> <li>• Assess what drives the decision-making of individuals and organisations within the complexities of the NHS</li> <li>• Appraise the role of ethics and professional considerations in healthcare decision-making</li> <li>• Evaluate the impact of sustainability and transformation partnerships on patient care services across England</li> <li>• Critique the roles of integrated care systems (ICSs) and accountable care organisations (ACOs) in the decision-making process</li> </ul>
O3.3	Compare alternative approaches to presenting information to management groups within a local health/ health and social care economy	<ul style="list-style-type: none"> <li>• Compare methods of compiling and presenting information for the decision-making process of differing groups</li> <li>• Assess the impact of NHS Digital as the custodian of data across the NHS in England on the presentation of information</li> <li>• Evaluate the on-line tools that assist a range of stakeholders; from patients to commissioners</li> <li>• Draft recommendations for good practice in the presentation of information</li> </ul>
O3.4	Critically analyse the use of performance indicators and benchmarking approaches and their effectiveness in improving organisation performance, providing assurance and managing risk	<ul style="list-style-type: none"> <li>• Critique the use of key performance indicators in board rooms to monitor performance and assist in decision-making</li> <li>• Assess the use of clinical evidence in formulating strategies and in commissioning</li> <li>• Appraise the value of benchmarking in reviewing the comparative performance of the NHS</li> </ul>

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		<ul style="list-style-type: none"> <li>Evaluate the use of benchmarking on decision making both personally and organisationally</li> </ul>
03.5	Assess the effectiveness of governance methods in supporting investments and disinvestments	<ul style="list-style-type: none"> <li>Appraise the role of business planning as a fundamental component of good decision-making</li> <li>Appraise the alternative approaches to investment and disinvestment together with the governance arrangements for each</li> </ul>
03.6	Evaluate the importance of risk and uncertainty in decision-making and their use in improving healthcare/ health and social care decisions	<ul style="list-style-type: none"> <li>Critique the role of good governance in addressing conflicts that may occur for professionals complying with Codes of conduct</li> <li>Evaluate various negotiation techniques for decision-making</li> <li>Assess how negotiating and managing internal and external relationships contribute to decision-making</li> </ul>

### Assessment process:

Learners will complete a 4,000-word portfolio based assessment centred on a case study.

## Module L7O4: Creating and delivering value in UK healthcare

Level 7, 20 credits

Total Qualification Time: 200 hours

Improving value is a high priority in the NHS faced with delivering more each year within limited resources. This module will address important issues affecting contemporary healthcare systems in relation to value. These include variation in access to services and the associated quality, cost and outcomes; overuse which results in waste i.e. anything that does not add value to the outcome for patients; and underuse, especially on harnessing the potential of technology. In a climate where there is a rising need and demand for healthcare with no additional resources, the focus must be on delivering better value for individuals and populations. This module will explore issues raised by health economics, the allocations process and patient-level cost and outcome data. It will help learners understand how the NHS, using scarce resources, can improve the quality of care to sustainably deliver the best possible outcomes for patients. The important role of the board in driving this change and in balancing competing priorities and seeking better value in healthcare will be explored.

### Module content:

- Defining value in healthcare finance – the role of health economics
- Allocation policy and its impact on value
- The use of NHS payment systems to drive value and change behaviours
- NHS cost behaviour analysis and its contribution to generating value
- NHS improvement techniques – efficiency, productivity and quality
- Investment and disinvestment decision-making in the NHS
- Working with the private sector to add value to the NHS
- Measuring outcomes and taxpayer value
- Board level decision-making for value.

	Learning outcomes. The learner will...	Assessment criteria The learner can...
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O4.1	Propose and defend the concept of value in contemporary UK healthcare and evaluate opportunities for the NHS to increase value	<ul style="list-style-type: none"> <li>• Critique the concept of value in contemporary UK healthcare</li> <li>• Evaluate opportunities for the NHS to increase value in healthcare through deployment of the techniques and discipline of economics.</li> <li>• Understand and compare the principle methods used when considering investment/ disinvestment</li> <li>• Compare the different models of joint working and collaboration with the private sector including public/ private initiatives (PPI), public/ private partnerships (PPP) and franchising models in the delivery of healthcare</li> </ul>
O4.2	Assess and evaluate different approaches to allocating scarce resources nationally and locally	<ul style="list-style-type: none"> <li>• Compare different approaches to allocating scarce resources in the NHS</li> <li>• Appraise and evaluate how NHS boards make key decisions on the allocation of resources given competing demands</li> </ul>
O4.3	Assess and evaluate different approaches to the ways that providers are reimbursed for delivering healthcare services and how behaviours might be changed	<ul style="list-style-type: none"> <li>• Compare the different types of contractual relationships typically employed in the NHS</li> <li>• Critically evaluate the charging methodologies/ approaches to reimbursement used by the NHS in England</li> <li>• Compare and contrast different reimbursement mechanisms and articulate the benefits and limitations of the various payment systems</li> <li>• Appraise payment mechanisms as agents of change</li> </ul>
O4.4	Evaluate the current NHS approach to costing and recommend ways to make the NHS costing process more efficient and effective	<ul style="list-style-type: none"> <li>• Appraise the principal classifications of costs in NHS organisations and of the usage of cost behaviour analyses in NHS planning and management</li> <li>• Evaluate the processes and benefits of patient-level costing and NHS service level reporting</li> </ul>

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O4.5	Evaluate the effectiveness of cost reduction methods and service transformation activities within a local health economy in the UK nations	<ul style="list-style-type: none"> <li>• Evaluate quality based and process focussed programmes and more recent system-wide or place-based planning initiatives to improve efficiency and productivity in the NHS</li> <li>• Evaluate demand side change initiatives such as examples of cross system working for their impact on cost reduction as well as service transformation</li> </ul>
O4.6	Critique the available outcome measures and propose how these may be used to influence payment arrangements to improve service delivery	<ul style="list-style-type: none"> <li>• Critique the inevitable and inherent tensions between the delivery of competing objectives and developments to measure service outcomes in healthcare services</li> <li>• Assess charging methodologies in the English NHS including the operation of payments by results (PBR) and the national tariff and commissioning for quality and innovation (CQUIN) payments in England</li> <li>• Assess the use of quality improvement techniques to improve outcomes</li> <li>• Critique the limitations and advantages of payment mechanisms as agents of behavioural change</li> </ul>
O4.7	Assess the role of the NHS board in balancing priorities and performance objectives	<ul style="list-style-type: none"> <li>• Critically evaluate the ways that NHS organisations choose or are required by regulators to measure their performance</li> <li>• Evaluate how NHS boards are held publically accountable for the holistic performance of their organisations</li> </ul>

### Assessment process:

Learners will complete a 4,000-word portfolio based assessment, including a case study and essay questions.

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## Module L7O5: Comparative healthcare systems

Level 7, 20 credits

Total Qualification Time: 200 hours

A healthcare system is a 'dynamic network of agents acting in parallel, constantly reacting to what the other agents are doing, which in turn influences behaviour and the network as a whole'. Across the world healthcare systems are faced with tackling how to meet increasing healthcare needs with limited resources in a way that is both qualitatively and financially sustainable. Sustainability needs to be addressed in terms of individual organisations, local geographical areas and for the healthcare system overall. This module will explore how this issue is tackled in the United Kingdom and elsewhere in the world, identifying both success and failure and contemplating where the NHS goes next when it is clear that it cannot provide everything for everyone for ever.

### Module content:

- Elements of a healthcare system
- Financing healthcare
- Classification of healthcare systems and their funding
- Country reviews of national healthcare systems
- International comparisons of health expenditure and their sensitivity to global/ local recession and growth
- The impact of lifestyle, ageing and technology on health spending
- The fiscal sustainability of health systems
- Global trends in healthcare – universal coverage, performance and payment systems
- Integrated care
- Issues facing emerging countries.

	Learning outcomes. The learner will...	Assessment criteria The learner can...
05.1	Critically analyse and evaluate a range of global health systems (of high, middle and low income countries) and their financing arrangements with respect to: a) global health expenditure and the impact of demography, recession and growth  b) healthcare issues facing	<ul style="list-style-type: none"><li>• Classify global healthcare systems and critique the process of assessing system performance</li><li>• Compare and contrast the advantages and disadvantages of four models of healthcare delivery and their variants</li><li>• Assess comparative health expenditure internationally and its</li></ul>

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	<p>emerging countries</p> <p>c) global trends in healthcare</p> <p>d) integration.</p>	<p>sensitivity to global/ local recession and growth</p> <ul style="list-style-type: none"> <li>• Assess the impact of factors such as geography, infrastructure, politics and culture on the economics of healthcare in emerging countries</li> <li>• Appraise the implementation of integrated care in the UK and other parts of the world</li> </ul>
05.2	<p>Critically appraise the financial sustainability of healthcare systems and the likely impact of lifestyle, aging and technology.</p>	<ul style="list-style-type: none"> <li>• Evaluate the sustainability of health systems in the context of the global economy</li> <li>• Critique global trends in healthcare through comparison of what is driving those trends</li> <li>• Appraise the impact of lifestyle, ageing and technology on demand for healthcare</li> </ul>

### Assessment process:

Learners will complete a 4,000-word portfolio based assessment, including a case study and essay questions.

## Module L706: Supporting quality care with patient-level costing

Level 7, 20 Credits

Total Qualification Time: 200 hours

### Module overview:

In a rapidly changing NHS, this module gives an understanding of costing fundamentals and the importance of costing in healthcare. This is key to recognising how clinical decisions affect the consumption of resources used to treat patients. Costing has a major role to play in identifying variation in health services, in particular when linked to outcomes and quality improvement initiatives. In the current financial context, the NHS must do things differently – this means clinical and financial staff working increasingly closely, finding new ways of delivering care and delivering the best possible value for the taxpayer. This module will help learners to understand how costing works in the NHS and the challenge of capturing complex data to facilitate accurate costing. They will explore how NHS organisations and local health economies can use costing data as operational intelligence, and link it with outcomes, to support evidence-based decision making. It will also provide insight into what needs to change and the barriers to making that happen.

### Module content:

- Costing fundamentals and the importance of costing in healthcare
- Costing at the patient level
- Collecting and using activity data
- Working with others in the creation and use of cost data
- Capturing and measuring outcomes
- Linking costs and outcomes
- The use of costing data for identifying variation and informing decision-making
- Using costing data as operational intelligence in healthcare – organisational/ service/ patient level
- Using costing data as operational intelligence in healthcare – wider health economy
- Harnessing the power of clinical and financial collaboration.

	Learning outcomes. The learner will...	Assessment criteria The learner can...
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O6.1	Analyse the role of cost data in the delivery of effective healthcare	<ul style="list-style-type: none"> <li>• Critique the basic fundamentals of costing and how these have evolved in response to the need to better understand costs and produce better quality data</li> <li>• Examine how costs can be classified and cost behaviour analysed</li> <li>• Evaluate the range of costing methods that may be adopted</li> <li>• Assess the processes and benefits of activity-based costing in the NHS</li> <li>• Appraise how cost data can be used to inform decisions and improve patient services</li> <li>• Analyse the role of cost data in the delivery of effective healthcare</li> </ul>
O6.2	Evaluate the quality of data used in the costing process	<ul style="list-style-type: none"> <li>• Evaluate/ assess the worth of data sources used in the costing process in the NHS</li> <li>• Recommend means to overcome data quality issues</li> <li>• Critique the role of information governance and how it affects data for costing</li> </ul>
O6.3	Evaluate the importance of linking costs and outcomes	<ul style="list-style-type: none"> <li>• Critique the theory behind value-based healthcare and why there has been a drive to link outcomes and costs</li> <li>• Evaluate the importance of linking costs and outcomes</li> </ul>
O6.4	Critique the technical and organisational challenges associated with implementing patient-level costing	<ul style="list-style-type: none"> <li>• Assess why understanding the cost of delivering healthcare is important and why costing shouldn't be seen as merely a 'finance' function</li> <li>• Critique the process of patient level costing in the NHS</li> <li>• Evaluate the benefits of costing at the patient level</li> <li>• Appraise how patient level information and costing systems (PLICS) data is reported and used</li> </ul>

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		<ul style="list-style-type: none"> <li>• Critique the technical and organisational challenges associated with implementing patient level costing</li> </ul>
O6.5	Critique how costing data is used within your trust	<ul style="list-style-type: none"> <li>• Assess alternative ways to measure outcomes</li> <li>• Critique the practical delivery of value-based healthcare</li> <li>• Evaluate the importance of linking costs and outcomes</li> <li>• Appraise how costing data is used in an organisation</li> </ul>
O6.6	Identify effective engagement techniques with key stakeholders to the costing process	<ul style="list-style-type: none"> <li>• Identify the internal and external key stakeholders and their role in the costing process</li> <li>• Defend the belief that costing should be more than an exercise that only concerns finance staff</li> <li>• How to collaborate with clinical colleagues and projects</li> </ul>
O6.7	Identify how best to communicate costing data within your organisation, as well as the wider health economy	<ul style="list-style-type: none"> <li>• Evaluate alternative means of presenting and communicating costing data</li> <li>• Appraise ways of engaging with clinicians in the costing process</li> <li>• Recommend communication methods of costing data to audiences within your organisation and in the wider health economy</li> </ul>

### Assessment process:

Learners will complete a 4,000 word case study based assessment

# HFMA Awarding organisation fees for learners

## HFMA qualifications fee list

### HFMA Diploma in Healthcare business and finance (60 credits):

Total cost: £1,650 + VAT. This includes:

- HFMA Registration fee: £400 (*payable as a deposit after application has been approved*)
- Assessment and certification: £1,250

### HFMA Higher diploma in Healthcare and business finance (60 credits):

Total cost: £1,650 + VAT. This includes:

- HFMA Registration fee: £400 (*payable as a deposit after application has been approved*)
- Assessment and certification: £1,250

### HFMA Certificate (20 credits):

Total cost: £675 + VAT. This includes:

- HFMA Registration fee: £150 (*payable as a deposit after application has been approved*)
- Assessment and certification: £525

**NOTE: Currently training for HFMA qualifications is only available through the HFMA Academy. Details of fees for access to their supported online training programme are available on the HFMA website.**

## Fees and invoicing

Full payment is required before the start of your course. Each learner is charged a registration fee at the time of registration for each qualification.

Registration fees are set by the Awarding organisation (HFMA Awarding organisation) and may change from time to time. The registration fee covers registration, enrolment and assessment for the specific qualification for which the learner is enrolled.

Fees are subject to annual review.

## Learner responsibility for fees

When a learner registers and is accepted on an HFMA Qualification they assume responsibility for the payment the above fees.

A learner must therefore have sufficient financial resources available to meet the fees, maintenance and other expenses that may be incurred throughout their programme of study.

**Further details regarding fees and responsibilities are provided in the copy of terms and conditions sent to you following your application to undertake an HFMA qualification.**

# The assessment process

## Introduction

This guidance gives useful information to learners for all HFMA qualifications.

## The assessment

HFMA qualifications are assessed via an assignment. The assessment can take a range of forms either singly or in combination:

- Case study: You will be given a scenario and supporting information which you use to respond to the question asked.
- Essay: You will respond directly to a question set by HFMA. You will provide an essay which has an introduction, main section and conclusion.
- Work-related written document: You will respond directly to a question set by HFMA. Unlike an essay, some questions may ask you to provide a report, action plan or other work-related written document.

## Submitting your work

HFMA qualification assessments will be submitted via the online environment and will be put through plagiarism software to identify any matches with other sources.

When submitting your completed assessment, you will be required to agree to the following declaration:

“I certify that this is all my own work and that use of material from any other source has been properly and fully acknowledged in the text. I have read the HFMA plagiarism policy and the HFMA Academy's advice on good academic practice. I understand that the consequence of committing plagiarism, if proven and in the absence of mitigating circumstances, may include failure in the assessment and/or removal from the HFMA qualification programme. I also certify that neither this piece of work, nor any part of it, has been submitted in connection with another assessment via HFMA or any other course provider.”

When submitting your work through Turnitin, you should also keep your own copy of the assessment submitted.

## Anonymity

All assessments are marked using your candidate number. Name and other identifying features other than your candidate number should not appear on submitted work. If referring to your own work context within your assessment, the organisation and any people referred to should be anonymized.

# Learner's handbook

## Submission dates

The required submission dates for each assessment are included on the assessment documents themselves.

## Requests for extensions

In the unlikely event that an extension is sought, requests should be made by email to [qualifications@hfma.org.uk](mailto:qualifications@hfma.org.uk) at least 5 working days before the assessment submission date giving reasons for your request. Your request will be acknowledged and responded to within 2 working days of receipt of the request. In the meantime, make sure you continue to work on your assessment as you may not be granted an extension. Please note extensions will not normally be granted for more than one week. Evidence may be required to support your request for extension.

## Late submission of assessments

Where assessments are submitted after the due date and an extension has not been granted, this will result in the reduction of the grade available for assessment submission. No submissions will be accepted once 10 working days after the submission date has been exceeded – these assignments will automatically be graded as Unsuccessful.

## Non-submission of assessments

Non-submission of assessments will result in an Unsuccessful grading – the failure of an assessment.

## Getting your assessment results

Your assessment results will be returned to you by email within 20 working days of the advertised original submission date.

## Resubmitting your work

Should your assessment submission unfortunately not reach the required pass grade, there may be the opportunity to resubmit a reworked assignment for marking. All resubmission grades will be capped at Pass. Details will be provided on timescales and processes along with your provisional assessment grading should this be applicable.

## Guidance for responding to the assessment questions

Make sure that you show thorough exploration of the question you have been asked. If the question and *all* of its implications are not understood, you will possibly not undertake sufficient and appropriate research. The result is an assessment that, at best, *partially* addresses the question. So:

- a) Spend time thinking about the question — what it asks you to address, and if there are any implicit arguments.
- b) The module you are completing is vocationally based, the quality of the work you submit should be as expected in the workplace. If it is a Board report, the content and quality should be as would be expected in your workplace; if it is a letter in response to an external stakeholder, the language used should be appropriate for that

## Learner's handbook

audience; if the requirement is a Communications plan, you should consider the needs of all stakeholders in developing the plan.

- c) Consider the learning outcomes for the Module you are studying (found as the Module Specification in the HFMA Academy Online Learning Environment) which highlight the skills you should be exhibiting in your response (such as critical analysis or evaluation).
- d) Fully understand the question. Make sure you frequently refer back to the question to help guide further research and the structure of your response. In some assessment submissions submitted, learners have not been able to achieve the marks they would have hoped (or even worse, have been unsuccessful in the assessment) because they have not addressed the specific requirements of the assessment. As an example, if the assignment asks you to “critically appraise” an approach to system planning or to “evaluate” why something happened, but the response given is a description of the approach, the grading of the answer will, at best, only be at Pass level.
- e) Review the grading criteria given on the back two pages of this document – these will guide on the approaches used in your answer that make the difference between submitting an answer which is Unsuccessful, to one which receives a Distinction grading. For example, in the Argument section b:

An Unsuccessful grading would consist of (b) “An argument with sustained weaknesses, significant gaps and/or is unconvincing. May include evidence of information gathered but this is not sufficient to sustain the argument and may even indicate a distinct lack of awareness”

A Distinction grading would consist of (b) “Strong and consistent argument that convincingly addresses issues, including uncertainties and conflicts, with evidence of originality. Comprehensive use of information gathered to support and further the argument”

- f) Compile a reference list of available material.
- g) Make a plan starting with the main points required to address the question. Thereafter, flesh these headings out to provide greater guidance to your argument. It is essential that these headings flow in a logical manner — if not, the assignment will not have a logical structure.
- h) Begin writing. It is important that your introduction and conclusion directly address the question's content. The introduction should be used to introduce the argument and its scope: it should tell the reader what they are about to read. The conclusion must round off the assignment, often in a summative manner. You should not use the conclusion to address or present any argument essential to the question that has not been addressed in the body of the assignment.
- i) You should use quotes and/or references to illustrate and substantiate your points, and underwrite the validity of your argument.

## Using referencing in your submission - avoiding plagiarism

Failing to reference the sources of information used in your assessment, may result in your failing to achieve the grade you worked for. Accurate referencing is required, and failing to do this may result in receipt of a lower grade and/or in investigations that plagiarism may be the reason.

Reports of plagiarism are taken extremely seriously and we will investigate any reports

## Learner's handbook

received from learners, tutors or assessors of suspected plagiarism. Additionally, all work submitted for assessment will be scrutinized by plagiarism detection software to identify potential cases for further investigation.

Further investigation may result in:

- you being required to resubmit the assessment,
- in the grading for the assessment being lowered, or
- in the rejection of the assessment and receipt of an Unsuccessful grade.

Plagiarism can be defined as:

- stealing and passing off (the ideas or words of another) as one's own
- using (another's production) without acknowledging the source
- committing literary theft
- presenting as new and original an idea or product derived from an existing source

Examples of plagiarism can be:

- submitting someone else's work as your own
- copying words or ideas from someone else, including from the internet, without giving credit
- failing to put a quotation in quotation marks
- giving incorrect information about the source of a quotation
- changing words but copying the sentence structure of a source without giving credit
- copying so many words or ideas from a source that it makes up the majority of your work, whether you give credit or not

NOTE: It is not acceptable to include in your answer text you have written which has been submitted for another qualification. Such text will show up as through the plagiarism detection software. Although this work was originally produced by you – it cannot be submitted here as your response as this would result potentially in you receiving double credit in your academic history for the same piece of work.

A very simple way of avoiding plagiarism is to quote the sources you use so that you give credit to the person who wrote the original text. If you want to use a piece of source material directly in your own work, you can do this by making it clear that you are quoting it rather than passing it off as your own text. You do need to be clear about which bit of the text comes from that source.

There are a number of publications and websites giving information about plagiarism and advice on quoting sources and constructing a reference list.

## Formatting and presentation

Assignments should be typed, double-spaced and have generous margins. Use 12 point text with a font that is easily legible (e.g. Calibri, Arial).

Type your candidate number at the top of the first page and every subsequent page (usually in the header). Do not include your name.

On the first page type the full title of the module and the date you started studying the module, eg September 2017. Clearly indicate which questions/ assignment elements are included in your submitted work. In assignments with multiple parts or questions clearly indicate which question you are answering throughout your script, eg essay title/ case study/ question number.

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Make sure that each page has the **page number** on the **bottom right-hand side**.

The paragraph formatting should be consistent throughout. Paragraphs should consist of more than one sentence, but avoid over-long paragraphs.

Heading and sub-headings may be used, particularly if your assignment is a report.

You should not use footnotes.

NOTE: Make sure you check the assignment upload instructions so that you are able to upload your work as the required number of files.

### Word count

The word count of each assignment should not vary by more than plus or minus 10%. The word count includes all content which you wish to be marked, including tables and appendices. The contents page, bibliography and reference list are not included in the word count, nor, if you are producing a Board report in your response, is the Executive Summary.

Assignments which exceed the 10% tolerance may be penalised for exceeding the advised word count either by reduction in the grade awarded, or by words exceeding the required count not being considered for marking.

Please note the word count for your assessment submission on the document before submission

### Illustrations and figures (tables, graphs, charts, etc.)

Illustrations should be clear and of good quality: you should use them to elucidate your argument and therefore refer to them in your text. They should be **numbered** and accompanied by a figure **caption** and the source cited if not your original work. Avoid lengthy discussions in figure captions.

You may insert illustrations into the main text or add them as a separate section at the end of your text as an appendix. Place appendices after the reference list.

Tables and other figures should be numbered, headed, and a source cited. Always ensure that presentation is clear and that you explain the relevance of the illustration or information in the main body of the text.

### Numbers, dates, etc.

Dates should take the form 11 October 1996 (**not** October 11th, etc.).

Numbers up to a **ten** should be written as a word; for larger numbers use figures. When referring to percentages in the text use 'per cent', not '%'.

### Quotations

All quotations and in-text references should use the Harvard referencing system, as detailed in the learner handbook and in "HFMA Academy guide to Harvard Referencing" directly via the following link <https://academy.hfma.org.uk/mod/book/view.php?id=2435> . In particular, note the guidance given on how to present short and long quotations. Your text must include the page number for all quotations, however short. A page number is not required when you

## Learner's handbook

paraphrase/ completely rewrite the author's words combining them with an original point of your own – however, you must still reference other authors' work alongside the relevant text.

### Reference list

You must append a reference list to the end of your assignment, using the Harvard referencing system. The Reference list is a list of works cited. It should give full details of each book, article or other source that you have used. You should not separate books from articles, etc. The list must be arranged in **alphabetical order by author, with the surname first.**

(See page below)

# Learner's handbook

Achieving a mark for criteria which include sub-criteria				
Criteria	Grade bands			
	Distinction	Merit	Pass	Unsuccessful
<b>1. Knowledge &amp; Understanding</b>				
<b>2. Argument</b> (a) Analysis, Synthesis & Evaluation b) Argumentation c) Reflection (d) Independent Research	If: <ul style="list-style-type: none"> <li>2 out of the 4 sub-criteria a) to d) are distinction and</li> <li>3 of the 4 sub-criteria are merit or above and</li> <li>No sub-criteria is unsuccessful</li> </ul> Argument criteria scores distinction overall	If: <ul style="list-style-type: none"> <li>2 out of the 4 sub-criteria a) to d) are marked at merit and</li> <li>No sub-criteria is unsuccessful</li> </ul> Argument criteria scores merit overall	If: <ul style="list-style-type: none"> <li>At least 3 of the sub-criteria are marked at pass</li> </ul> Argument criteria scores pass overall	If: <ul style="list-style-type: none"> <li>2 out of the 4 sub-criteria a) to d) are unsuccessful</li> </ul> Argument criteria scores unsuccessful overall
<b>3. Application to practice</b>				
<b>4. Presentation</b> (a) Assessment guidelines b) Structure (c) Referencing (d) Use of Language (e) Word count	If: <ul style="list-style-type: none"> <li>2 out of the 5 sub-criteria a) to e) are distinction and</li> <li>3 of the 5 sub-criteria are merit or above and</li> <li>No sub-criteria is unsuccessful</li> </ul> Presentation criteria scores distinction overall	If: <ul style="list-style-type: none"> <li>2 out of the 5 sub-criteria a) to e) are marked at merit and</li> <li>No sub-criteria is unsuccessful</li> </ul> Presentation criteria scores merit overall	If: <ul style="list-style-type: none"> <li>At least 3 of the sub-criteria are marked at pass</li> </ul> Presentation criteria scores pass overall	If: <ul style="list-style-type: none"> <li>2 out of the 5 sub-criteria a) to e) are unsuccessful</li> </ul> Presentation criteria scores unsuccessful overall

Achieving an overall grade mark				
Grade award	Distinction criteria	Merit criteria	Pass criteria	Unsuccessful criteria
<b>Distinction</b>	Minimum of 2 criteria	Minimum of 3 criteria	Maximum of 1 criteria	None permitted
<b>Merit</b>		Minimum of 2 criteria	Maximum of 2 criteria	None permitted
<b>Pass</b>			Minimum of 3 criteria passed	Maximum of 1 criteria
<b>Unsuccessful</b>				2 or more criteria

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Criteria	Grade bands			
	Distinction	Merit	Pass	Unsuccessful
	<i>The work displays:</i>	<i>The work displays:</i>	<i>The work displays:</i>	<i>The work displays:</i>
<b>1. Knowledge &amp; Understanding</b>	Strong evidence of a comprehensive and systematic understanding of an extensive range of appropriate issues, concepts, theories and research.	Clear evidence of a comprehensive and systematic understanding of all major - and some minor - issues, concepts, theories and research.	Evidence of a systematic understanding of all major - and some minor - issues, concepts, theories and research, which may contain some gaps.	Evidence of a limited understanding of issues, concepts, theories and research.
<b>2. Argument</b> <i>(a) Analysis, Synthesis &amp; Evaluation</i> <i>(b) Argumentation</i> <i>(c) Reflection (where relevant)</i> <i>(d) Independent Research</i>	<p>(a) Consistently precise, accurate and reasoned analysis, synthesis and/or evaluation, which may include numerical methods; addressing issues with insight or originality</p> <p>(b) Strong and consistent argument that convincingly addresses issues, including uncertainties and conflicts, with evidence of originality. Comprehensive use of information gathered to support and further the argument</p> <p>(c) Excellent awareness of the effect of personal influence on the values, ideas, assumptions and ways forward shown in the assignment</p> <p>(d) Strong evidence of considerable personal research which is critically evaluated for key conceptual and methodological issues.</p>	<p>(a) Clear evidence of precision, accuracy and clear reasoning throughout the analysis, synthesis and/or evaluation, which may include numerical methods; addressing all issues appropriately</p> <p>(b) Clear evidence of an argument that is generally convincing and addresses most issues. Very good use of information gathered to support and further the argument</p> <p>(c) Very good awareness of the effect of personal influence on the values, ideas, assumptions and ways forward shown in the assignment</p> <p>(d) Clear evidence of considerable personal research which is critically evaluated for key conceptual and methodological issues, with only minor omissions.</p>	<p>(a) Adequate levels of precision, accuracy and reasoning in analysis, synthesis and/or evaluation, which may include numerical methods; and which mainly address key issues</p> <p>(b) Evidence of a mainly convincing argument which may lack consistency. Clear use of information gathered but may fail to support and further the argument at times</p> <p>(c) Awareness of the effect of personal influence on the values, ideas, assumptions and ways forward shown in the assignment</p> <p>(d) Appropriate use of personal research which is critically evaluated for key conceptual and methodological issues, although this may not be consistent throughout.</p>	<p>(a) Errors or a lack of precision, accuracy or reasoning which affect the consistency of the analysis, synthesis or evaluation and/or key gaps in the issues addressed</p> <p>(b) An argument with sustained weaknesses, significant gaps and/or is unconvincing. May include evidence of information gathered but this is not sufficient to sustain the argument and may even indicate a distinct lack of awareness</p> <p>(c) Limited or no awareness of the effect of personal influence on the values, ideas, assumptions and ways forward shown in the assignment</p> <p>(d) Limited evidence of personal research. Methodological or conceptual evaluation may be limited and/or used in inconsistent or inappropriate ways.</p>

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Criteria	Grade bands			
	Distinction	Merit	Pass	Unsuccessful
	<i>The work displays:</i>	<i>The work displays:</i>	<i>The work displays:</i>	<i>The work displays:</i>
<b>3. Application to practice</b>	Sustained, precise and well-judged application of thoughts and practices at the forefront of the discipline – showing credible and relevant links with professional practice to an exceptional level.	Consistent evidence of the application of thoughts and practices at the forefront of the discipline – showing credible and relevant links with professional practice.	Mainly clear evidence of an understanding of thoughts and practices at the forefront of the discipline – showing mainly competent links with professional practice. There may be a few minor gaps, lack of clarity or imprecision.	Significant gaps or repeated lack of clarity or precision in the understanding of thoughts and practices at the forefront of the discipline – showing limited or irrelevant links with professional practice.
<b>4. Presentation</b> <i>(a) Assessment guidelines</i> <i>(b) Structure</i> <i>(c) Referencing</i> <i>(d) Use of Language</i> <i>(e) Word count</i>	(a) Excellent interpretation of the assessment requirements (b) Excellent presentation with a highly logical, coherent structure (c) Precise, full and appropriate referencing throughout (d) Subtle and precise use of language expressing highly nuanced thought with clarity and precision (e) Adherence to the word count.	(a) Very good interpretation of the assessment requirements (b) Very good presentation with a logical, coherent structure (c) Full and appropriate referencing with minor or insignificant errors (d) Clear and precise use of language allowing a complex argument to be easily understood and followed (e) Adherence to the word count.	(a) A competent interpretation of the assessment requirements (b) Adequate presentation with a generally coherent structure (c) Appropriate referencing with some minor inconsistencies, errors or omissions (d) Generally clear use of language sufficient for arguments to be readily understood and followed (e) Adherence to the word count.	(a) Limited or very limited interpretation of the assessment requirements (b) Poor presentation and lacks a coherent structure (c) Inadequate referencing which contains repeated inconsistencies, errors or omissions (d) Poor use of language with significant errors in expression affecting overall clarity (e) Unsatisfactory adherence to the word count.

### Assessment extensions and re-sits

A learner who fails a first submission of an assessment will usually be allowed to make a resubmission using the feedback received on their first assessment opportunity. All resits will be permitted on payment of the resubmission fee of £175 + VAT.

Where a learner fails a core module following a resubmission, they will usually be ineligible to continue with the Qualification. A learner who fails an optional module may be allowed to attempt one further optional module, at the discretion of the Awarding organisation.

A learner who fails more than one optional module will usually be ineligible to continue with the qualification.

#### Appeals

There is no right of appeal against a provisional grade. If you believe you have grounds to appeal against a ratified grade/ mark awarded following an Awards board you will need to submit this in writing to:

HFMA Qualifications - Appeals  
1 Temple Way  
Bristol  
BS2 0BU

Or email [qualifications@hfma.org.uk](mailto:qualifications@hfma.org.uk). Please see our Appeals Policy (Appendix A to this document) for further information.

#### Extenuating circumstances

If you will be unable to submit an assessment by the submission deadline due to extenuating circumstances, i.e. significant personal or family problems, an accident or illness you will need to submit a statement in writing, in advance of the submission date, to [qualifications@hfma.org.uk](mailto:qualifications@hfma.org.uk) which will then be considered by the Awarding organisation team.

## Appendices

### HFMA Awarding organisation qualification policies

A wide range of policies and procedures govern the work of HFMA Awarding organisation all of which are designed to ensure an equitable, consistent, transparent process of assessment for each and every learner for a qualification. The list below identifies the range of policies and a short outline of what each is about – full copies of each policy are provided as appendices to this document.

- **Appeals policy - See Appendix A**  
This policy outlines the process which applies where learners wish to appeal the decisions resulting after application of the Reasonable adjustments and considerations policy, the Malpractice and maladministration policy or the Enquiries about results policy. It sets out the process you should follow when submitting appeals to us and the process we will follow when responding to enquiries and appeals.
- **Complaints policy – See Appendix B**  
This policy outlines the processes and procedures to be adopted where a learner has a complaint about the provision of an examination or other service provided by the awarding organisation. For complaints about assessments, please also see the Appeals policy and Enquiries about results policy for the most appropriate route to follow.
- **Enquiries about results policy – See Appendix C**
- This policy relates to situations where candidates learners may wish to query Final results achieved in assessments. It should be read in conjunction with the Appeals policy and the Complaints policy as they may be the appropriate policies to adopt depending on circumstances. **Equality and diversity policy – See Appendix D**  
This policy covers the actions of everyone acting for HFMA ensuring that they do not discriminate in any situation against another individual or group, directly or indirectly, because of age, sex, disability, gender re-assignment (whether proposing to undergo, is undertaking or has undergone the process), marriage and civil partnership, pregnancy and maternity, race, religion and belief and sexual orientation. The equal opportunities policy applies at all times and influences the way individuals treat their colleagues, clients, learners, visitors, third parties and contacts
- **Malpractice and maladministration policy - Appendix E**  
This policy covers any practice which compromises the quality and integrity of the qualifications HFMA offers as a result of malpractice or maladministration. Malpractice covers any deliberate actions, neglect, default or other practice that compromises or could compromise assessment and the integrity of HFMA qualifications. Maladministration is any activity or practice which results in non-compliance with administrative regulations and requirements and includes the application of persistent mistakes or poor administration.
- **Plagiarism policy - Appendix F**  
The HFMA AO Plagiarism policy covers occasions when learners for qualifications submit work including the ideas of another as their own without full acknowledgement of the source. Learners are required to agree a declaration that their work is original

## Appendices

when submitting work for assessment and any identified cases of plagiarism (whether intentional or through lack of awareness are treated very seriously. Guidance on Harvard referencing is available to HFMA learners.

- **Reasonable adjustments and special considerations policy – Appendix G**  
The purpose of this policy is to set out the procedures that learners, assessors and tutors should follow when implementing reasonable adjustments and special considerations. The policy also gives details of the service provided by HFMA for these arrangements. This policy is informed by the guidance provided by the Joint Council for Qualifications. Further information and guidance about reasonable adjustments can be found at [www.jcq.org.uk](http://www.jcq.org.uk)
- **Whistleblowing Policy – Appendix H**  
This policy outlines how HFMA aims to establish and maintain a culture of openness and encourages learners to raise issues which concern them in relation to the delivery of our qualifications and services. This policy is designed provide learners with information about the Public Interest Disclosure Act as well as the process by which you may whistleblow. It also explains that there are certain protections in place to protect whistle-blowers

# Appendices

## Appendix A - Appeals policy

### Introduction

This policy is aimed at our customers, including learners, who are delivering/enrolled on or have taken an HFMA approved qualification or module. It sets out the process you should follow when submitting appeals to us and the process we will follow when responding to enquiries and appeals.

It is also for use by our staff to ensure they deal with all appeals in a consistent manner.

### Centre's responsibility

It's important that your staff involved in the management, assessment and quality assurance of our qualifications and your learners are aware of the contents of the policy.

In addition, you must have internal appeal arrangements which learners can access if they wish to appeal against a decision taken by your centre. If an individual wishes to appeal against a decision taken by a centre it must first of all go through the centre's appeals process before bringing the matter to HFMA.

### Review arrangements

We'll review the policy annually as part of our self-evaluation arrangements and revise it as and when necessary in response to customer and learner feedback or requests from, or good practice guidance issued by, the regulatory authorities (eg to align with any appeals and complaints process established by the regulatory authorities such as Ofqual).

If you would like to feedback any views please contact us via the details provided at the end of this policy.

### Fees

We will **not** charge you or your learners a fee to cover the administrative and personnel costs involved in dealing with appeals.

### Areas covered by the policy

This policy covers:

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- Appeals from learners and/or centres in relation to an assessment decision on the basis that we did not apply procedures consistently or that procedures were not followed properly and fairly
- Appeals from centres in relation to an HFMA decision concerning a centre's application to offer an HFMA qualification.
- Appeals from centres concerning the contents of a centre monitoring report.
- Appeals from centres and/or learners relating to an HFMA decision to decline a centre's request to make reasonable adjustments or give special considerations
- Appeals from centres or learners in relation to the application by HFMA of a sanction/action on a centre resulting from a verification visit or an investigation into malpractice or maladministration or a decision to amend a learner/set of learners results following a malpractice or malpractice investigation
- Appeals from centres relating to a decision made by HFMA following an investigation into a complaint about a centre.
- Appeals if you believe we have not applied our procedures consistently or that procedures were not followed properly, consistently and fairly.

### Process for raising an appeal

You (and your learners) have 20 working days from the date we notified you of the decision you are appealing against in which to log an appeal against our decision - this includes assessment results; hence please advise your learners/staff to retain their course evidence until they receive their result.

If you appeal on behalf of your learners you must ensure that you have obtained the written permission of the learner(s) concerned as grades/results can go down as well as up as a result of an investigation.

Learners who wish to appeal about their assessment results or about a related decision should either be supported by their centre and should have exhausted their centre's own appeals process before appealing to us. In the latter case, learners must provide us with evidence that they have first appealed to their centre. It's expected that learners will only appeal directly to us in exceptional circumstances.

Centres should complete the Appeals form at the end of this policy in order to submit an Appeal on behalf of a learner and or the centre and in doing so supply relevant supporting information such as the following where relevant:

- learner's name and learner number
- date(s) you or the learner received notification of HFMA's decision
- title and number of the HFMA qualification affected or nature of service affected (if appropriate)

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- full nature of the appeal
- contents and outcome of any investigation carried out by you relating to the issue

### Situations brought to our attention by the regulatory authorities

Where the regulators notify us of failures that have been discovered in the assessment process of another awarding organisation we will review whether or not a similar failure could affect our own assessment processes and arrangements.

### Initial review of the appeal details

Upon receipt of all appeals our Head of Awarding Organisation will acknowledge receipt of the appeal within 48 hours and aim to respond fully to the initial review of the potential appeal within 4 weeks. Please note that in some cases the review processes may take longer, for example, if a centre visit is required. In such instances, we'll contact all parties concerned to inform them of the likely revised timescale.

At all times we will ensure that HFMA personnel assigned to the appeal investigation have the appropriate level of training and competence and they have had no previous involvement or personal interest in the matter. If the Head of Awarding Organisation has an involvement in the appeal matter they will not be responsible for allocating a member of staff to carry out the investigation or for overseeing and managing the investigation.

The first stage will be for us to undertake an initial, informal assessment of all potential appeals to ensure the application is complete and to ascertain if the issue can be resolved before it goes to a formal appeal. In all instances we will ensure that the person carrying out this initial check will not have a personal interest in the decision being appealed.

Following the initial review of the potential appeal we will write to the appellant with details of our decision to either:

1. amend our original decision in light of the new rationale/evidence being put forward and which has now been reviewed
2. to confirm we stand by our original decision and in doing so the rationale for this decisions and request that you confirm, within 3 weeks, whether you now accept this decision or if wish to formally proceed to our formal appeals process which will be carried out by an independent party.

### Seeking an independent review

If you decided to proceed to the independent appeal stage we will arrange for an independent review to be carried out.

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This will be carried out by someone who is not an employee of ours, an assessor working for us, or otherwise connected to our organisation. They will also be someone with the relevant competence to make a decision in relation to the appeal and will have not a personal interest in the decision being appealed.

The Independent Reviewer will review all the evidence which took place in the above stages and review if we've applied our procedures fairly, appropriately and consistently in line with our policy.

The independent review process may involve:

- a discussion with the appellant or the learner and HFMA personnel
- a request for further information from the appellant, the learner or HFMA personnel
- a centre visit by authorised HFMA personnel.

The Independent Reviewer's decision is final in relation to how HFMA will consider such appeals and we'll let you know the outcome of the review within 4 weeks of receipt of the third appeal. If the centre/learner is still unhappy with the outcome at this stage they are entitled to raise the matter with the relevant qualification regulator (eg Ofqual in England).

### Successful appeals and/or issues brought to our attention by Ofqual

In situations where an appeal has been successful, or where an investigation following notification from Ofqual indicates a failure in our processes, HFMA will give due consideration to the outcome and will as appropriate take actions such as:

- amend the profile of the centre concerned in the Parnassus system
- identify any other learners who have been affected correct or, where it cannot be corrected, mitigate as far as possible the effect of the failure (eg and amend the results for the learner(s) affected following an appropriate investigation)
- review our associated processes and policies to ensure that the 'failure' does not occur again or mitigate the situation as far as possible if the failure that occurred cannot be corrected

We will also cooperate with any follow-up investigations required by the qualifications regulators and if appropriate agree any remedial action with them.

### Contact us

If you've any queries about the contents of the policy, please contact our Head of Awarding Organisation via email [jayne.rowland@hfma.org.uk](mailto:jayne.rowland@hfma.org.uk).

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## Appeals form

Learner's name:

Learner number:

Date(s) you or the learner received notification of HFMA's decision:

Title and number of the HFMA qualification affected or nature of service affected (if appropriate):

Full nature of the appeal:

Contents and outcome of any investigation carried out by you relating to the issue:

## Appendix B - Complaints Policy

### Introduction

This document sets out our complaints policy and procedure and is aimed at our centres, learners and all interested parties who encounter a direct or indirect service from HFMA.

We value all the centres delivering our qualifications and the learners who undertake them and our aim every day is to exceed the expectations of our customers.

We are confident of providing a high quality service and would be extremely disappointed if this is not the case.

Therefore, it is important should you feel you have encountered a level of service that is below both yours and our expectations that you raise any concerns you may have with us immediately so that we may address them and learn lessons.

### Scope

This policy covers complaints learners, members of the public or centres may wish to make in relation to the qualifications and associated services offered by HFMA.

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It is not to be used to cover appeals in relation to decisions made by HFMA. These areas are covered by our Appeals Policy. Should a complaint be submitted which is in fact an enquiry or an appeal we will respond to inform the relevant party that the issue is being considered, where appropriate, in accordance with the approach outlined in our Customer Service statement or Appeals policy.

If you are unhappy about the way an examination or assessment was delivered and conducted and you suspect malpractice or maladministration may have occurred you should send your concern to us in accordance with the arrangements in our Malpractice and Maladministration Policy.

### Centre's responsibility

Centres should take all responsible steps to ensure that their staff involved in the management, assessment and quality assurance of our qualifications, and your learners, are aware of the contents of this policy and that your centre has a complaints handling procedure and appeals process in place to deal with complaints from learners about the services they provide from your centre. If an individual is unhappy about a service or activity being delivered by a centre it must first of all go through the centre's complaints process before bringing the matter to HFMA.

### Review arrangements

We'll review the policy and its associated procedures annually as part of our self-evaluation arrangements and revise it as and when necessary in response to customer, learner or regulatory feedback (eg to align with any appeals and complaints process established by the regulators) and any trends that may emerge in the subject matter of complaints received.

If you would like to feedback any views please contact us via the details provided at below.

### How should I complain?

All of our staff have been trained to help our customers and they all like to help, so you should first try to sort out any problem at the earliest opportunity by speaking to the person who dealt with you. Alternatively centres can raise and/or submit a compliant form found at the end of the policy.

If they cannot help or you wish to speak to someone else, you can ask to speak to the manager in charge.

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If this is not possible, or if you are not satisfied with the help provided by the manager, please send a written complaint, normally within one month of the event you are complaining about, and address it to us at the contact details outlined at the end of policy.

Learners and/or members of the public who wish to complain about a level of service provided by the centre at which they have taken a HFMA qualification should have exhausted their centre's own complaints process before bringing the complaint to us. However, learners can make the complaint directly to us in exceptional circumstances where they feel there was a significant breach by the centre of our various procedures (contact details are contained at the end of this policy).

### If I complain what details do I have to give?

When you contact us, please give us your full name, contact details including a daytime telephone number along with:

- a full description of your complaint (including the subject matter and dates and times if known);
- any names of the people you have dealt with so far;
- copies of any papers or letters to do with the complaint

Sometimes a complainant will wish to remain anonymous. However, it is always preferable to reveal your identity and contact details to us, and if you are concerned about possible adverse consequences please inform us that you do not wish for us to divulge your identity.

While we are prepared to investigate issues which are reported to us anonymously we shall always try to confirm an allegation by means of a separate investigation before taking up the matter with those the complaint/allegation relates.

### Complaints brought to our attention by the regulators

Where the regulators notify us about failures that have been discovered in the assessment process or other activities of another awarding organisation, these will be reviewed in the same manner as other external complaints in accordance with the procedures below to ascertain if the same issue could affect HFMA qualifications.

### What will happen to my complaint?

We will acknowledge receipt of your complaint within 48 hours, letting you know who is investigating your complaint.

Our Head of Awarding Organisation will be responsible for ensuring the investigation is carried out in a prompt and effective manner and in accordance with the procedures in this

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policy and will allocate a relevant member of staff to lead the investigation and establish whether or not issue relating to the complaint has occurred.

At all times we will ensure that HFMA personnel assigned to the investigation have the appropriate level of training and competence and they have had no previous involvement or personal interest in the matter. If the Head of Awarding Organisation has an involvement in the complaint matter they will not be responsible for allocating a member of staff to carry out the investigation or for overseeing and managing the investigation.

We aim to investigate the complaint within 5 working days. If your complaint is more complex, or involves people who are not available at the time, we may extend this to 10 working days. We may contact you within this period to seek further information or clarification (in some instances we may recommend a meeting). At the end of the investigation we shall write/email to inform you of our decision.

### Successful complaints and/or issues brought to our attention by Ofqual

If any part of your complaint is upheld we will of course respond to the complainant accordingly and give due consideration to how we can improve our service and arrangements. For example, by reviewing our procedures to assess the impact on our qualification development, delivery or awarding arrangements and assessment process (if relevant) or arranging for staff training. In extreme circumstances, internal disciplinary procedures may be exercised where the performance or behavior of our staff is deemed in appropriate.

In situations where a complaint has been successful, or where an investigation following notification from the regulators indicates a failure in our processes, we will give due consideration to the outcome and will take appropriate actions such as:

- identify any other learner and/or centre who has been affected by that failure,
- correct, or where it cannot be corrected, mitigate as far as possible the effect of the failure, and
- review and amend our arrangements, where appropriate, to reduce the likelihood that the failure will reoccur in the future.
- start internal disciplinary procedures against a member of our staff if we found their behaviour was not appropriate in accordance with our internal procedures and arrangements

### What if I am not happy with the reply?

If you disagree with the decision the first point of call is the Head of Awarding Organisation.

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If you are still unhappy with the decision taken by HFMA in reviewing the complaint you can, where relevant, take the matter through our Appeal arrangements which are outlined in our Appeals Policy. If after you have exhausted our Appeals arrangements and you are still unsatisfied with the outcomes, you can complain/appeal directly to the relevant regulatory authority for the qualification (eg Ofqual in England)

### Contact us

If you have any queries about the contents of the policy, please contact our Head of Awarding Organisation via email [jayne.rowland@hfma.org.uk](mailto:jayne.rowland@hfma.org.uk)

### Complaints form

Full name:

Email address:

Daytime telephone number:

Full description of your complaint (including the subject matter and dates and times if known);

- any names of the people you have dealt with so far;
- copies of any papers or letters to do with the complaint

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## Appendix C - Enquiries about results policy

### Introduction

The purpose of this policy is to set out the procedures that learners should follow if they wish to make an enquiry about a result to HFMA.

HFMA has three policies available for learners who wish to make enquiries about the assessment process or the marks and awards given.

### Enquiries about results

If you have an enquiry about the marks or award given please refer to this policy. This policy is used to carry out initial checks on the marks awarded.

### Complaints

If you have a complaint to make about the service provided by HFMA which does not affect results or grades, please refer to HFMA's Complaints Policy.

### Appeals

If you are dissatisfied with the mark or award given and wish to formally appeal against decisions made, please use the appropriate HFMA Appeals Policy.

All policies are available on our website at [www.hfma.org.uk](http://www.hfma.org.uk)

Applications for enquiry about results must be submitted in writing to HFMA's head office no later than two weeks after the receipt of the results.

**HFMA will not consider any telephone requests for enquiries about results.**

### Issue and review

The date of issue of this policy is August 2018. This policy will be reviewed annually.

### Types of enquiry

At the enquiry stage, a learner may request the following to be carried out:

#### **Clerical Re-check**

A full clerical re-check including the provision of a statement of the marks for an individual learner where applicable. The Head of Awarding Organisation will undertake this free of charge for the learner. Requests for a clerical re-check for an individual learner will be responded to within 7 working days of receipt.

#### **Review and re-mark**

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A review of the mark records and a re-mark of the assessment for an individual learner by a different assessor and a full clerical re-check and statement of marks awarded.

This incurs a cost of £25 per learner. Requests for a review and re-mark for an individual learner will be responded to within 14 working days of receipt.

### **Review and moderation**

Review and moderation of all the mark records for a group of learners or a single assessment session by a designated member of the assessment team who did not carry out the original assessment, together with a full clerical re-check and statement of marks awarded by category.

This incurs a cost of £50 per learner to cover administration costs. Requests for a review and moderation for a group of learners will be responded to within a 6 week period from receipt.

### **Outcomes and informing learners**

A written response to the learner with the outcome of the enquiry will be provided. If the outcome of an enquiry is considered to bring into question the accuracy of the results for other learners in that or other sessions, the outcome of the original enquiry will be notified to the learner and will extend to include any other learners who may have been affected. Learners will be notified of the further investigation and the outcome.

As a consequence of a change to marks awarded following an enquiry, HFMA will:

- (a) notify the learner at once in writing;
- (b) issue a revised statement of results and/or issue a revised certificate where necessary, when the original certificate has been returned.

In cases where a clerical check, review, re-mark or moderation reveals inaccurate marking or a clerical error, marks for examination components may be confirmed, lowered or raised and the award of a Pass, Merit or Distinction may also be confirmed, lowered or raised. Learners must be aware of and accept the possible outcomes of an enquiry.

### **Appeals against the Outcome of Enquiries About Results**

After the outcome of an enquiry about results has been reported, the learner may appeal against the decision. All appeals must be made in writing and in accordance with the requirements set out in the appropriate Appeals Policy.

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## Appendix D - Equality and Diversity policy

### Introduction

This policy is aimed at our centres and learners, who are delivering/enrolled on or have taken a HFMA approved qualification or module

It sets out our intention to deliver a service and range of qualifications that are fair, accessible and do not include any unnecessary barriers to entry.

### Centre's responsibility

It's important that your staff involved in the delivery of our qualifications and your learners are fully aware of the contents of the policy (eg via their induction when first embarking on HFMA qualifications).

### Review arrangements

We'll review the policy annually and revise it as and when necessary in response to customer and learner feedback, changes in our practices, actions from the regulatory authorities or external agencies or changes in legislation.

If you would like to feedback any views, please contact us via the details provided at the end of this policy.

### Areas covered by the policy

- HFMA staff

HFMA commits to incorporating specific and appropriate duties in respect of implementing the equal opportunities policy into job descriptions and work objectives of all staff.

HFMA will provide equality training and guidance as appropriate to our staff; including as part of staffs' induction training as well as further on-going courses as identified via our internal staff performance review arrangements.

- Qualification Development

HFMA will ensure that there are no features that could disadvantage any groups of learners that share a particular characteristic or barriers to entry other than those directly related to the purpose of the units or qualifications. The nature of any such

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features or barriers will be stated and the inclusion of the requirements that create the barrier justified in terms why they are required for the particular unit or qualification.

- Centres

HFMA expects its centres to enable learners to have equal access to training and assessment for qualifications irrespective of their sex, marital status, age, religion, colour, race, nationality or ethnic origin or disability. Assessment must similarly be undertaken without discrimination. Centres are required to have in place a policy to ensure that such discrimination does not occur either directly, indirectly or as a result of pressure from other bodies. This policy should apply to all satellite/associated venues and there should be arrangements in place to monitor its application and effectiveness.

Where complaints relating to issues of inequality cannot be satisfactorily resolved by the centre, learners must be made aware of their right to appeal to HFMA via the arrangements outlined in our Appeals Policy.

### Monitoring the success and relevance of our arrangements

HFMA is committed to complying with all current and relevant legislation and, which at the time of writing includes, but is not limited to the Equality Act 2010 and Northern Ireland Equality Law.

As part of the learner registration and certification processes for qualifications and units HFMA may collect information on diversity, requests for special considerations, access arrangements and feedback from learners, centres and other stakeholders.

All relevant issues identified that suggests that our provision or services may have unnecessarily impacted on learners will be reported back to our Head of Awarding Organisation who will be responsible for ensuring that relevant staff introduce, as appropriate, amendments to provision and/or services where necessary and in accordance with our documented procedures for developing and reviewing units and qualifications.

Details of our ongoing reviews will be made available to the qualification regulators upon request.

### Contact us

If you've any queries about the contents of the policy, please contact our Head of Awarding Organisation via email [jayne.rowland@hfma.org.uk](mailto:jayne.rowland@hfma.org.uk)

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## Appendix E - Malpractice & Maladministration policy

### Introduction

This policy is aimed at our customers, including learners, who are delivering/registered on HFMA approved qualifications or units within or outside the UK and who are involved in suspected or actual malpractice/maladministration – and also applies to HFMA staff who are suspected of being involved in such cases. It is also for use by our staff to ensure they deal with all malpractice and maladministration investigations in a consistent manner.

It sets out the steps your centre, and learners or other personnel must follow when reporting suspected or actual cases of malpractice/maladministration and our responsibilities in dealing with such cases. It also sets out the procedural steps we will follow when reviewing the cases.

### Centre's responsibility

It is important that your staff involved in the management, assessment and quality assurance of our qualifications, and your learners, are fully aware of the contents of the policy and that your centre has arrangements in place to prevent and investigate instances of malpractice and maladministration.

A failure to report suspected or actual malpractice/maladministration cases, or have in place effective arrangements to prevent such cases, may lead to sanctions being imposed on your centre (see our Sanctions policy for details of the sanctions that may be imposed).

If you wish to receive guidance/advice from us on how to prevent, investigate, and deal with malpractice and maladministration then please contact us (details below) and we will happily provide you with such advice and/or guidance.

Your centre's compliance with this policy and how it takes reasonable steps to prevent and/or investigate instances of malpractice and maladministration will be reviewed by HFMA periodically through our ongoing centre monitoring arrangements.

Should an investigation be undertaken into your centre, the head of centre must:

- ensure the investigation is carried out by competent investigators who have no personal involvement in the incident or interest in the outcomes

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- ensure the investigation is carried out in an effective, prompt and thorough manner and that the investigator(s) look beyond the immediate reported issues to assure your centre that arrangements at the centre are appropriate for all qualifications
- respond speedily and openly to all requests relating to the allegation and/or investigation
- cooperate and ensure their staff cooperate fully with any investigation and/or request for information

### Review arrangements

We will review the policy annually as part of our annual self-evaluation arrangements and revise it as and when necessary in response to customer and learner feedback, changes in our practices, actions from the regulatory authorities or external agencies, changes in legislation, or trends identified from previous allegations.

In addition, this policy may be updated in light of operational feedback to ensure our arrangements for dealing with suspected cases of malpractice and maladministration remain effective.

If you would like to feedback any views please contact us via the details provided at the end of this policy.

### Definition of Malpractice

Malpractice is essentially any activity or practice, which deliberately contravenes regulations and compromises the integrity of the internal or external assessment process and/or the validity of certificates. It covers any deliberate actions, neglect, default or other practice that compromises, or could compromise:

- the assessment process;
- the integrity of a regulated qualification;
- the validity of a result or certificate;
- the reputation and credibility of HFMA ; or,
- the qualification or the wider qualifications community.

Malpractice may include a range of issues from the failure to maintain appropriate records or systems to the deliberate falsification of records in order to claim certificates.

For the purpose of this policy this term also covers misconduct and forms of unnecessary discrimination or bias towards certain or groups of learners.

### Definition of Maladministration

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Maladministration is essentially any activity or practice, which results in non-compliance with administrative regulations and requirements and includes the application of persistent mistakes or poor administration within a centre (eg inappropriate learner records).

## Examples of maladministration

The categories listed below are examples of centre and learner maladministration. Please note that these examples are not exhaustive and are only intended as guidance on our definition of malpractice:

- Persistent failure to adhere to our learner registration procedures.
- Persistent failure to adhere to our centre recognition and/or qualification requirements and/or associated actions assigned to the centre.
- Late learner registrations (both infrequent and persistent).
- Unreasonable delays in responding to requests and/or communications from HFMA.
- Inaccurate claim for certificates .
- Failure to maintain appropriate auditable records, eg certification claims and/or forgery of evidence.
- Withholding or the delaying of information, by deliberate act or omission, from us which is required to assure HFMA of the centre's ability to deliver qualifications appropriately.
- Misuse of our logo and trademarks or misrepresentation of a centre's relationship with HFMA and/or its recognition and approval status with HFMA.
- Poor administration arrangements and/or records.
- Persistent mistakes in relation to our delivery arrangements.
- Failure to adhere to, or to circumnavigate, the requirements of our Reasonable Adjustments and Special Considerations Policy.

## Examples of malpractice

The categories listed below are examples of centre and learner malpractice. Please note that these examples are not exhaustive and are only intended as guidance on our definition of malpractice:

- Denial of access to premises, records, information, learners and staff to any authorised HFMA representative and/or the regulatory authorities.
- Deliberate misuse of our logo, brand, name and trademarks or misrepresentation of a centre's relationship with HFMA and/or its recognition and approval status with HFMA.
- Deliberate failure to continually adhere to our centre recognition and/or qualification approval requirements or actions assigned to your centre.

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- Intentional withholding of information from us, which is critical to maintaining the rigour of quality assurance and standards of qualifications.
- Deliberate failure to carry out internal assessment, internal moderation or internal verification in accordance with our requirements.
- The unauthorised use of inappropriate materials / equipment in assessment settings (eg mobile phones).
- A loss, theft of, or a breach of confidentiality in, any assessment materials.
- Insecure storage of assessment materials.
  
- Inappropriate circulation/distribution of assessment materials.
  
- Unauthorised amendment, copying or distributing of exam/assessment papers/materials.
- Inappropriate assistance/support to learners by centre staff (eg unfairly helping them to pass a unit or qualification).
- Deliberate failure to adhere to, or to circumnavigate, the requirements of our Reasonable Adjustments and Special Considerations Policy.
- Plagiarism by learners/staff.
- Copying from another learner.
- Cheating by learners/staff.
- Personation - assuming the identity of another learner or having someone assume their identity during an assessment.
- Collusion or permitting collusion in exams/assessments.
- Deliberate contravention by learners of the assessment arrangements we specify for our qualifications.
- Fraudulent claim for certificates and/or deliberate submission of false information to gain a qualification or unit.
- False records.
  
- Deliberate failure to adhere to our learner registration and certification procedures.
- Deliberate failure to maintain appropriate auditable records, eg certification claims and/or forgery of evidence.
- Learners still working towards qualification after certification claims have been made.
- Selling certificates for cash.
  
- Selling papers/assessment details.
  
- Extortion.
  
- Fraud.
  
- Threatening or abusive behaviour that threatens the safety of staff and/or is intended to put undue influence on the outcomes of an assessment/award.

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## Process for making an allegation of malpractice or maladministration

Anybody who identifies or is made aware of suspected or actual cases of malpractice or maladministration at any time **must immediately notify HFMA**. In doing so they should put them in writing/email and enclose appropriate supporting evidence (centres can submit details of potential/actual cases of malpractice via the Malpractice form in our Share point online system).

All allegations must include (where possible):

- centre's name, address and number
- learner's name and HFMA registration number
- centre/HFMA personnel's details (name, job role) if they are involved in the case
- details of the HFMA course/qualification affected or nature of the service affected
- nature of the suspected or actual malpractice and associated dates
- details and outcome of any initial investigation carried out by the centre or anybody else involved in the case, including any mitigating circumstances

In addition we ask that the person making the allegation declares any personal interest they may have in the matter to us at the outset.

If a centre has conducted an initial investigation prior to formally notifying us, the centre should ensure that staff involved in the initial investigation are competent and have no personal interest in the outcome of the investigation. We would expect that such investigations would normally involve the Head of Centre (if there is an investigation into allegations of malpractice or irregularities against the Head of the Centre or the management of the centre then such investigations should be carried out by the Chair of the Governing Body of the centre or his/her nominee). However, it is important to note that in all instances the centre must immediately notify us if they suspect malpractice or maladministration has occurred as we have a responsibility to the regulatory authorities to ensure that all investigations are carried out rigorously and effectively.

## Confidentiality and whistle blowing

Sometimes a person making an allegation of malpractice or maladministration may wish to remain anonymous. Although it is always preferable to reveal your identity and provide us with your contact details. However, if you are concerned about possible adverse consequences that may occur should you identify be revealed to another party then please inform us that you do not wish for us to divulge your identity and we will work to ensure your details are not disclosed.

We will always aim to keep a whistleblower's identify confidential where asked to do so

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although we cannot guarantee this and we may need to disclose your identity should the complaint lead to issues that need to be taken forward by other parties. For example:

- the police, fraud prevention agencies or other law enforcement agencies (to investigate or prevent crime, including fraud)
- the courts (in connection with any court proceedings)
- other third parties such as the relevant regulatory authority (eg Ofqual in England).

The investigator(s) assigned to review the allegation will not reveal the whistleblower's identity unless the whistleblower agrees or it is absolutely necessary for the purposes of the investigation (as noted above). The investigator(s) will advise the whistleblower if it becomes necessary to reveal their identity against their wishes.

A whistleblower should also recognise that he or she may be identifiable by others due to the nature or circumstances of the disclosure (eg the party which the allegation is made against may manage to identify possible sources of disclosure without such details being disclosed to them).

Once a concern has been raised we have a duty to pursue the matter. It will not be possible to prevent the matter being investigated by subsequently withdrawing their concern as we are obliged by the regulators to follow-up and investigate allegations of malpractice or maladministration.

In all cases, we will keep you updated as to how we have progressed the allegation (eg we have undertaken an investigation) and the whistle-blower will have the opportunity to raise any concerns about the way the investigation is being conducted with the investigator(s). However, we won't disclose details of all of the investigation activities and it may not be appropriate for us to disclose full details of the outcomes of the investigation due to confidentiality or legal reasons (eg disclose full details on the action that may be taken against the parties concerned). While we cannot guarantee that we will disclose all matters in the way that you might wish, we will strive to handle the matter fairly and properly.

Please see our Whistleblowing Policy for further information in relation to our whistleblowing arrangements.

### Responsibility for the investigation

In accordance with regulatory requirements all suspected cases of maladministration and malpractice will be examined promptly by HFMA to establish if malpractice or maladministration has occurred and we will take all reasonable steps taken to prevent any adverse effect from occurring as defined by the regulator Ofqual.

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All suspected cases of malpractice and maladministration will be passed to our Head of Awarding Organisation and we'll acknowledge receipt, as appropriate, to external parties within 48 hours.

Our Head of Awarding Organisation will be responsible for ensuring the investigation is carried out in a prompt and effective manner and in accordance with the procedures in this policy and will allocate a relevant member of staff (eg a member of our quality assurance team) to lead the investigation and establish whether or not the malpractice or maladministration has occurred, and review any supporting evidence received or gathered by HFMA .

At all times we will ensure that HFMA personnel assigned to the investigation have the appropriate level of training and competence and they have had no previous involvement or personal interest in the matter.

### Notifying relevant parties

In all cases we will tell the person who made the allegation who will be handling the matter, how they can contact them, what further assistance we may need from them and agree a timetable for feedback (see the above section on 'Confidentiality and whistleblowing for possible limitations in relation to the feedback and the section below – 'Investigation timelines and summary process – for details of our anticipated response times).

In cases of suspected or actual malpractice or maladministration at a centre, we'll notify the Head of your Centre involved in the allegation (except when the head of centre or management is under investigation; in which case communication may be with the Chair of Governors, Local Authority officials or other appropriate authorities) that we'll be investigating the matter.

In the case of learner malpractice, we may ask your centre to investigate the issue in liaison with our own personnel. We will only ask the centre to investigate the matter where we have confidence that the investigation will be prompt, thorough, independent and effective.

In all cases we may withhold details of the person making the allegation if to do so would breach a duty of confidentiality or any other legal duty.

We may engage and communicate directly with members of centre staff who have been accused of malpractice if appropriate (eg the staff member is no longer employed by the centre) and/or communicate directly with a learner or their representative (eg if there is a contradiction in the evidence provided during an investigation or where the centre is suspected of being involved in malpractice).

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Where applicable, our Responsible Officer will inform the appropriate regulatory authorities if we believe there has been an incident of malpractice or maladministration, which could either invalidate the award of a qualification, or if it could affect another awarding organisation. In particular we will keep them informed of progress in large and/or complex cases.

Where the allegation may affect another awarding organisation and their provision we will also inform them in accordance with the regulatory requirements and obligations imposed on HFMA by the regulator Ofqual and/or seek to undertake a joint investigation with them if appropriate. If we do not know the details of organisations that might be affected we will ask Ofqual to help us identify relevant parties that should be informed.

If fraud is suspected and/or identified we may also notify the police.

### Investigation timelines and summary process

Where possible, we aim to complete the investigation within 10 working days of receipt of the allegation. Please note that in some cases the investigation may take longer; for example, if a centre visit is required. In such instances, we'll advise all parties concerned of the likely revised timescale.

The fundamental principle of all investigations is to conduct them in a fair, reasonable and legal manner, ensuring that all relevant evidence is considered without bias. In doing so investigations will be underpinned by terms of reference and based around the following broad objectives:

- To establish the facts relating to allegations/complaints in order to determine whether any irregularities have occurred.
- To identify the cause of the irregularities and those involved.
- To establish the scale of the irregularities and whether other qualifications may be affected.
- To evaluate any action already taken by the centre.
- To determine whether remedial action is required to reduce the risk to current registered learners and to preserve the integrity of the qualification.
- To ascertain whether any action is required in respect of certificates already issued.
- To obtain clear evidence to support any sanctions to be applied to the centre, and/or to members of staff, in accordance with our Sanctions Policy.
- To identify any adverse patterns or trends.

In carrying out any investigation HFMA will be sensitive to the effect on, and reputation of, a centre and/or those members of staff who may be the subject to investigation. We will strive to ensure that the investigation is carried out as confidentially as possible and the organisation/person who is the subject of the allegation will have the opportunity to raise any

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issues about the both about the proposed approach and the conduct of the investigation with the investigator(s) during the investigation.

The investigation may involve a request for further information from relevant parties and/or interviews with personnel involved in the investigation. In any interviews carried out with the person(s) accused of malpractice/maladministration they can choose to be accompanied by a work colleague, trade union representative, or other party.

In addition we will:

- Ensure all material collected as part of an investigation is kept secure. All records and original documentation concerning a completed investigation that ultimately leads to sanctions against a centre will be retained for a period of no less than five years. If an investigation leads to invalidation of certificates, or criminal or civil prosecution, all records and original documentation relating to the case will be retained until the case and any appeals have been heard and for five years thereafter.
- Expect all parties, who are either directly or indirectly involved in the investigation, to fully co-operate with us.

Either at notification of a suspected or actual case of malpractice or maladministration and/or at any time during the investigation, we reserve the right to impose sanctions on the centre in accordance with our Sanctions Policy in order to protect the interests of learners and the integrity of the qualifications. The Head of Awarding Organisation will be responsible for regularly reviewing the application and maintenance of sanctions to ensure they continue to be appropriate and proportionate to the incident(s) and risk of future incidents occurring.

We also reserve the right to withhold a learner's, and/or cohorts, results for all the HFMA course/qualifications and/or units they are studying at the time of the notification/investigation.

If appropriate, we may find that the complexity of a case or a lack of cooperation from a centre means that we are unable to complete an investigation. In such circumstances we will consult the relevant regulatory authority in order to determine how best to progress the matter.

Where a member of HFMA's staff is under investigation we may suspend them or move them to other duties until the investigation is complete.

Throughout the investigation our Head of Awarding Organisation will be responsible for overseeing the work of the investigation team to ensure that due process is being followed, appropriate evidence has been gathered and reviewed and for liaising with and keeping informed relevant external parties.

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## Investigation report

If we believe there is sufficient evidence to implicate an individual/centre in malpractice/ and/or maladministration we will:

- Inform them (preferably in writing) of the allegation
- Inform them of the evidence we found to support our judgment
- Inform them that information in relation to the allegation and investigation may be, or has been, shared with the regulators and other relevant bodies (eg police)
- Provided them with an opportunity to consider and respond to the allegation and our findings
- Inform them of our Appeals policy should they wish to appeal against our decision

After an investigation, we'll produce a draft report for the parties concerned to check the factual accuracy (centres will normally receive this via email). Any subsequent amendments will be agreed between the parties concerned and ourselves. The report will cover the following areas:

- Identify where the breach, if any, occurred.
- Confirm the facts of the case (and any mitigating factors if relevant)
- Identify who is responsible for the breach (if any)
- Contain supporting evidence where appropriate (eg written statements)
- Confirm an appropriate level of remedial action to be applied.

We'll make the final report available to the regulatory authorities and other external agencies as required.

If it was an independent/third party that notified us of the suspected or actual case of malpractice, we may also inform them of the outcome – normally within 10 working days of making our decision - in doing so we may withhold some details if to disclose such information would breach a duty of confidentiality or any other legal duty.

If it's an internal investigation against a member of our staff the Head of Awarding Organisation will agree the report with the relevant internal managers and appropriate internal disciplinary procedures will be implemented. In some circumstances the police or other external authorities may need to be alerted.

## Investigation outcomes

If the investigation confirms that malpractice or maladministration has taken place we will consider what action to take to:

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- Minimise the risk to the integrity of certification now and in the future.
- Maintain public confidence in the delivery and awarding of qualifications.
- Discourage others from carrying out similar instances of malpractice or maladministration.
- Ensure there has been no gain from compromising our standards.

The action we may take include (this list is indicative only and is not meant to form an exhaustive list):

- impose actions in relation to your centre with specified deadlines in order to address the instance of malpractice/maladministration and to prevent it from reoccurring such as:
  - Undertaking additional/increased visits to a centre to provide them with a greater level of support and/or monitoring depending on their needs and performance.
  - Requiring specific centre staff to undergo additional training and/or scrutiny by the centre if there are concerns about their ability to undertake their role in the delivery of HFMA qualifications effectively.
  - Not permitting specific centre staff to be involved in the delivery or assessment of HFMA qualifications (eg not permitting an individual to invigilate HFMA examinations or assessments)
  - Altering the way, and the period in which, centres receive examination/assessment materials from HFMA if there are concerns around their ability to maintain the security and confidentiality of such materials.
  - Appointing independent invigilators to observe an exam at the centre if there are concerns around the centre's arrangements and/or the centre is unable to resource particular exams.
  - Appointing independent assessors to undertake assessments at the centre if there are concerns around the centre's arrangements or resource levels.
- Impose sanctions on your centre – if so these will be communicated to you in accordance with our sanctions policy along with the rationale for the sanction(s) selected.
- Take action against learner in relation to proven instances of maladministration or malpractice such as some or all of the following (which may be communicated to the learner by HFMA and/or the learner's centre):
  - Issuing a written warning that if the offence is repeated further action may be taken
  - Loss of all marks/credits for the related work/unit
  - Disqualification from the unit(s)/qualification
  - Placing a ban from taking any further qualifications with us (eg for a set period of time)

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- In cases where certificates are deemed to be invalid, inform centre(s) concerned and the regulatory authorities why they're invalid and any action to be taken for reassessment and/or for the withdrawal of the certificates. We'll also ask the centre(s) to let the affected learners know the action we're taking and that their original certificates are invalid and ask the centre – where possible – to return the invalid certificates to HFMA . We'll also amend our database so that duplicates of the invalid certificates cannot be issued and we expect the centre to amend their records to show that the original awards are invalid.
- Amend aspects of our qualification development, delivery and awarding arrangements and if required assessment and/or monitoring arrangements and associated guidance to prevent the issue from reoccurring.
- Inform relevant third parties (eg funding bodies) of our findings in case they need to take relevant action in relation to the centre.
- Carry out additional, related investigations if we suspect the issue may be more widespread at the centre and/or at other centres.

In proven cases of malpractice and/or maladministration by a centre HFMA reserves the right to charge the centre for any resits and reissuing of certificates and/or additional quality assurance activities/centre monitoring visits. The fees for which will be the current HFMA prices for such activities at the time of the investigation.

In addition, to the above the Head of Awarding Organisation will record any lessons learnt from the investigation and pass these onto relevant internal colleagues to help HFMA prevent the same instance of maladministration or malpractice from reoccurring.

If the relevant party(ies) wishes to appeal against our decision to impose sanctions, please refer to our Appeals Policy.

### Contact us

If you've any queries about the contents of the policy, please contact our Head of Awarding Organisation via email, [jayne.rowland@hfma.org.uk](mailto:jayne.rowland@hfma.org.uk)

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## Appendix F – HFMA Plagiarism policy

### Overview

Learner actions in the completion of assignments and their submission for marking towards the achievement of HFMA qualifications are governed by a series of guidelines, rules and regulations available in the HFMA Awarding Organisation learner handbook and on the HFMA website. This Plagiarism policy with the attendant procedures form an important component of this.

University of Oxford defines plagiarism as “...presenting someone else’s work or ideas as your own, with or without their consent, by incorporating it into your work without full acknowledgement.”

As in the definition here, plagiarism in text documents does not only include individual phrases, but may also cover the individual words and phrases, sentence structure or paraphrasing (where for example some words have been changed but the content is essentially the same as that found elsewhere). Text sources in publications, on the web and the work of other learners will also be considered in plagiarism checks.

Plagiarism may arise because of inexperience or lack of confidence on the part of the learner as well as in a deliberate attempt to mislead. Whatever the reasons, plagiarism constitutes academic malpractice and is not acceptable in completion of HFMA qualifications.

### Purpose

The purpose of this Policy is to maintain academic standards accepted in materials submitted for assessment towards achievement of HFMA qualifications. This policy is supported by documented procedures to maintain these standards.

### Scope

The scope of this Policy includes all learner submissions for HFMA qualifications. Knowledge of the policy contents and use in working practices apply to learners submitting work for assessment as well as employees, all contractors, consultants, temporary employees and business partners with any involvement in preparing learners for and the marking of HFMA qualifications.

### Similarity reports

All scripts submitted for assessment on HFMA qualifications will be subject to electronic checks of content through Turnitin. This results in a production of a similarity report identifying instances of potential plagiarism found in the document.

Once generated, the similarity report will be used as part of a process of review by the marking team to check possible instances of plagiarism and to instigate action where required.

### Exceptions

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Any exceptions to this policy must be approved in writing by the CEO and the records kept by the Awarding Organisation. All exceptions to policies should be reviewed on an annual basis.

## Enforcement

Any learner for an HFMA qualification or member of the marking team found to have breached this policy may be subject to disciplinary action.

## Review and monitoring

This policy is monitored by the Head of Awarding Organisation and reviewed by the Quality Assurance Committee for recommendations to the Board of Trustees on an annual basis.

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## Appendix G - Reasonable adjustments and special considerations policy

### Introduction

This policy is primarily aimed at our customers (centres) and learners who are delivering/registered on or have taken a HFMA approved qualification or unit. It is also for use by our staff to ensure they deal with all reasonable adjustment and special consideration requests in a consistent manner.

This policy outlines:

- our arrangements for making reasonable adjustments and special considerations in relation to our qualifications
- how learners qualify for reasonable adjustments and special considerations
- the reasonable adjustments we will permit and those where permission is required in advance before they are applied
- what special considerations will be given to learners

### Centre's responsibility

It is important that your staff involved in the management, assessment and quality assurance of our qualifications and your learners are fully aware of the contents of the policy.

On their centre visits, our Head of Awarding Organisation may check that your relevant colleagues and learners are aware of its contents and purpose.

### Review arrangements

We will review the policy annually as part of our self-evaluation arrangements and revise it as and when necessary in response to customer and learner feedback, changes in our practices, actions from the regulatory authorities or external agencies or changes in legislation.

If you would like to feedback any views please contact us via the details provided at the end of this policy.

### Arrangements not covered by this policy

Circumstances for both internal and external assessment not covered in this policy should be discussed with HFMA before assessment takes place. Please contact us via the details provided at the end of this policy.

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## Appeals

If you wish to appeal against our decision to decline requests for reasonable adjustments or special consideration arrangements, please refer to our Appeals Policy.

## Policy overview

HFMA is committed to complying with all current and relevant legislation in relation to the development and delivery of our qualifications and, which at the time of writing includes, but is not limited to the Equality Act 2010. We seek to uphold human rights relating to race relations, disability discrimination and special educational needs of our learners and to provide equal reasonable adjustments and special considerations for all learners registered on our qualifications.

As a recognised centre, we expect you to have a fair access to assessment policy in operation, which reflects the following principles and guidelines.

Assessment should be a fair test of learners' knowledge and what they are able to do, however, for some learners the usual format of assessment may not be suitable. We ensure that our qualifications and assessments do not bar learners from taking our qualifications.

We recognise that reasonable adjustments or special considerations may be required at the time of assessment where:

- learners have a permanent disability or specific learning needs
- learners have a temporary disability, medical condition or learning needs
- learners are indisposed at the time of the assessment.

The provision for reasonable adjustments and special consideration arrangements is made to ensure that learners receive recognition of their achievement so long as the equity, validity and reliability of the assessments can be assured. Such arrangements are not concessions to make assessment easier for learners, nor advantages to give learners a head start.

There are 2 ways in which access to fair assessment can be maintained:

- through reasonable adjustments and
- through special considerations.

## Process for requesting reasonable adjustments and/or special considerations

If a centre is making a request on behalf of its learners it should complete a Reasonable adjustments and special consideration request form (centres will find this in our Share point system) and in doing so supply relevant supporting information. For example:

- learner's name and HFMA registration number
- nature of, and rationale for, the request

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- supporting information/evidence (eg medical evidence or a statement from the invigilator or any other appropriate information)

Learners can, in exceptional circumstances, make requests direct to HFMA by phoning or emailing our Head of Awarding Organisation on 0117 929 4789 or emailing them at [jayne.rowland@hfma.org.uk](mailto:jayne.rowland@hfma.org.uk)

Requests for reasonable adjustments should be submitted no later than 30 days before the assessment due date.

Requests for special consideration should be submitted as soon as possible after the assessment and not later than 5 working days after the assessment. Requests for special consideration may only be accepted after the results of assessment have been released in the following circumstances:

- application has been overlooked at the centre and the oversight is confirmed by the centre co-coordinator
- medical evidence comes to light about a learner's condition, which demonstrates that the learner must have been affected by the condition at the time of the assessment, even though the problem revealed itself only after the assessment
- for onscreen assessments where results are immediately available.

If the application for special consideration is successful, the learner's performance will be reviewed in the light of available evidence. It should be noted that a successful application of special consideration will not necessarily change a learner's result.

### How HFMA will deal with requests

We will aim to respond to all requests within 5 working days of receipt. If we are unable to respond on the same day we will provide you with an estimated response date.

### Definition of reasonable adjustments

A reasonable adjustment is any action that helps to reduce the effect of a disability or difficulty that places the learner at a substantial disadvantage in the assessment situation. They are made to an assessment for a qualification to enable a disabled learner to demonstrate his or her knowledge, skills and understanding of the levels of attainment required by the specification for that qualification.

Reasonable adjustments must not affect the integrity of what needs to be assessed, but may involve:

- changing usual assessment arrangements, for example allowing a learner extra time to complete the assessment activity
- adapting assessment materials, such as providing materials in Braille
- providing assistance during assessment, such as a sign language interpreter or a reader

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- re-organising the assessment room, such as removing visual stimuli for an autistic learner
- changing the assessment method, for example from a written assessment to a spoken assessment
- using assistive technology, such as screen reading or voice activated software
- providing the mechanism to have different colour backgrounds to screens for onscreen assessments or asking for permission for copying to different coloured paper for paper-based assessments
- providing and allowing different coloured transparencies with which to view assessment papers

Reasonable adjustments are approved or set in place before the assessment activity takes place; they constitute an arrangement to give the learner access to the programme. The use of a reasonable adjustment will not be taken into consideration during the assessment of a learner's work.

HFMA and centres are only required by law to do what is 'reasonable' in terms of giving access. What is reasonable will depend on the individual circumstances, cost implications and the practicality and effectiveness of the adjustment. Other factors, such as the need to maintain competence standards and health and safety, will also be taken into consideration.

### Definition of special considerations

Special consideration can be applied after an assessment if there was a reason the learner may have been disadvantaged during the assessment.

For example, special consideration could apply to a learner who had temporarily experienced:

- an illness or injury
- some other event outside of their control and which has had, or is likely to have had, a material effect on that learner's ability to take an assessment or demonstrate his or her level of attainment in an assessment.

Special consideration should not give the learner an unfair advantage, neither should its use cause the user of the certificate to be misled regarding a learner's achievements. The learner's result must reflect his / her achievement in the assessment and not necessarily his / her potential ability.

Special consideration, if successful, may result in a small post-assessment adjustment to the mark of the learner. The size of the adjustment will depend on the circumstances and reflect the difficulty faced by the learner.

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Centre's should note that

- where an assessment requires the learner to demonstrate practical competence or where criteria have to be met fully, or in the case of qualifications that confer a License to Practice, it may not be possible to apply special consideration.
- in some circumstances, for example for on-demand assessments, it may be more appropriate to offer the learner an opportunity to take the assessment at a later date.

### Contact us

If you've any queries about the contents of the policy, please contact Jayne Rowland  
Telephone 0117 929 4789 or via email [jayne.rowland@hfma.org.uk](mailto:jayne.rowland@hfma.org.uk)

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## Section 1 - Making reasonable adjustments

### Principles of making reasonable adjustments

These principles should be followed when making decisions about a learner's need for adjustments to assessment:

- should not invalidate the assessment requirements of the qualification
- should not give the learners an unfair advantage
- should reflect the learner's normal way of working
- should be based on the individual need of the learner

We and our centres have a responsibility to ensure that the process of assessment is robust and fair and allows the learner to show what they know and can do without compromising the assessment criteria.

When considering whether an adjustment to assessment is appropriate, HFMA and our centres need to bear in mind the following (where appropriate for the related qualification):

- Adjustments to assessment should not compensate the learner for lack of knowledge and skills. The learner must be able to cope with the content of the assessment and be able to work at the level required for the assessment.
- Any adjustment to assessment must not invalidate the assessment requirements of the qualification or the requirements of the assessment strategy. Competence standards should not be altered. Whilst we will take all reasonable steps to ensure that a learner with a disability or difficulty is not placed at a substantial disadvantage, in comparison with persons who are not disabled, in terms of access to assessment, there is no duty to make any adjustment to a provision, criterion or practice which is defined as a competence standard. All learners' performance must be assessed against set standards. These standards cannot be altered, but it may be possible to change the delivery or process of assessment so that each learner has an equal opportunity to demonstrate what they know, understand and can do.
- Any adjustment to assessment must not give the learner an unfair advantage or disadvantage over other learners. The qualification of a learner who had an adjustment to assessment must have the same credibility as that of any other learner. As vocational qualifications may lead to employment, achievement of such qualifications must give a realistic indication to the potential employer of what the holder of the certificate can do.
- Any adjustment to assessment must be based on the individual need of the learner. Decisions about adjustments to assessment should be taken after careful consideration of the assessment needs of each individual learner, the assessment requirements of the qualification and the nature and extent of the support given as

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part of normal teaching practice. A centre should not assume that the same adjustment will be required for all assessments. Different qualifications and different methods of assessments can make different demands on the learner. The learner should be consulted throughout the process.

- Any adjustment to assessment should reflect the learner's normal way of working providing this does not affect what is being assessed in any way. The learner should have experience of and practice in the use of the adjustment.
- Any adjustment to assessment must be supported by evidence which is sufficient, valid and reliable.
- All adjustments to assessment must be authorised by the Head of Centre or a member of staff with delegated authority.

### The process for making the adjustment

There are three routes through which a learner may be granted adjustments to assessment. These routes are to:

- Use reasonable adjustments permitted at the discretion of the centre

In some cases HFMA may permit the centre to implement reasonable adjustments without seeking prior permission. In these cases HFMA requires centres to keep records for inspection (including any declaration that are signed and dated by a member of the centre staff who has formally been given delegated authority for this by the Head of Centre).

- Apply to HFMA for permission
- Agree the adjustment with the Head of Awarding Organisation to the centre

Centres should keep records of adjustments they have permitted and those they have requested from HFMA. These records should normally be kept for 3 years following the assessment to which they apply.

It is recommended that centres nominate members of staff to take responsibility for demonstrating the implementation and recording of adjustments to assessments for monitoring by HFMA or the regulatory authorities.

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## Qualification specific information

### Assessments which are not taken under examination conditions

With these types of assessments the centre has greater flexibility to be responsive to an individual learner's needs and choose an assessment activity and method that will allow the learner to demonstrate attainment.

These types of assessments may include, for example, coursework, set assignments which are researched in the learner's own time, assessment activities devised by HFMA , assessments where the learner has to collect, present or describe evidence, information or opinion in order to demonstrate competence.

The assessment requirements for many vocational qualifications fall into the above.

In these types of assessments the learner may meet the specified assessment criteria in any way that is valid. To facilitate access where there is evidence of need, the centre may:

- allow the learner to use any mechanical, electronic or other aids in order to demonstrate achievement as long as the aids:
  - are generally commercially available
  - reflect the learner's normal way of working
  - enable the learner to meet the specified criteria
  - do not give the learner an unfair advantage.
- present assessment materials or documents in a way that reflects the learner's normal way of working and enables him or her to meet the specified assessment criteria, for example, materials do not have to be in written or spoken format, unless specified by the assessment requirements.
- allow the learner to present their answers or evidence in any format as long as it enables them to demonstrate that they have met the assessment criteria, for example, answers or evidence do not have to be in written or spoken format unless specified by the assessment criteria.

The centre is advised to adopt a flexible approach in identifying alternative ways of achieving the assessment requirements. The centre is advised to contact HFMA to discuss alternative arrangements that may be appropriate for specific situations.

The outcome produced by the learner must at all times:

- meet the requirements of the specifications regardless of the process or method used
- be assessable
- be able to be moderated or verified.

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In the case of long-term illness of an individual learner or when a permanent health condition/disability means a learner's completion of assessment takes additional time it may be possible to permit an extension to the deadline for the submission of work for certification. A centre should note that it will not be possible to allow time extensions for all qualifications.

Where reasonable adjustments are put in place for these types of assessments, the centre should check whether permission needs to be obtained from HFMA . The centre should ensure that they adhere to HFMA 's requirements for record keeping and supporting evidence.

### Assessments for externally verified qualifications

Some qualifications require learners to compile a portfolio of evidence which can consist of a mixture of work products, observation reports, witness statements, knowledge tests, etc. Making appropriate access arrangements in qualifications of this type can be more straight forward than in qualifications where the mode of assessment is more firmly fixed.

The benefits of being able to vary the assessment evidence and choose the most appropriate method of obtaining evidence should be considered when the learner is first accepted onto a programme.

Where there is an identified need, the learner may present their evidence in any format as long as it enables them to demonstrate that they have met the specified assessment criteria. For example, a learner may present their evidence through the medium of Braille, on audio cassette or on video. Alternatively, oral questioning or witness statements may replace written responses or signed delivery.

Where evidence is produced in Braille or signed onto video, it is the centre's responsibility to ensure that a person who is suitably qualified in Braille or sign language is available to translate the material for the internal and external verifier/assessor if this is required.

Where the learner uses alternative means of providing evidence, the method must have equal rigour to those used for other learners.

The learner must fulfill the demands of the criteria consistently over a period of time, regardless of method used to obtain the evidence. The assessment criteria may not be amended, re-worded or omitted.

The learner may use any mechanical or electronic aids which are available in the workplace or which are commercially available in order to demonstrate competence. For example, these may include specially adapted equipment or assistive technology. The centre is required to ensure that a learner has the necessary and appropriate resources to enable the learner with access-related needs to produce evidence of developing the portfolio.

All adjustments should be consistent with the learner's normal way of working and must not give the learner an unfair advantage over others.

While assessors, internal and external verifiers normally prefer to see a portfolio made up of evidence which is varied, the centre should be prepared to accept a more restrictive variety

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of evidence as a means of enabling access. It is sensible, however, to discuss this matter with the internal and/or external verifier at an early stage.

Where reasonable adjustments are put in place for verified types of assessments, the centre should check whether permission needs to be obtained from HFMA or the external verifier. The centre should ensure that they adhere to HFMA's requirements for record keeping and supporting evidence.

### Identifying learners who are eligible for reasonable adjustments

Learners will only be eligible for reasonable adjustments if their disability or difficulty places them at a substantial disadvantage in the assessment situation, in comparison to a person who is not disabled or affected.

Any adjustment to assessment will be based on what the learner needs to access the assessment. Below are some examples of learner needs that may be eligible for adjustments to assessments. This list is not exhaustive and it should be noted that some learner needs will fall within more than one of the categories set out below.

#### Communication and interaction needs

A learner with communication and interaction difficulties may have problems with reading or writing, the effects of which could be reduced through the use of a reader, word processor, scribe, British Sign Language (BSL)/English interpreter, screen reading software or voice activated software. They may also benefit from extra time during assessments that are time-constrained to allow them to demonstrate their skills and knowledge.

#### Cognition and learning needs

A learner with learning difficulties and difficulties with comprehension may benefit from extra time in time-constrained examinations. They may also need assistance with reading and writing.

#### Sensory and physical needs

A learner may need to have assessment material modified for hearing impairment and visual impairment. They may also need to use a BSL/English interpreter, practical assistant, reader and scribe. In addition they may benefit from the use of assistive technology and extra time to complete assessments.

#### Behavioral, Emotional and Social needs

The learner may benefit from supervised rest breaks and separate accommodation, either within the centre or at an alternative venue. A learner with attention difficulties may need the use of a prompter.

#### Learners for whom English is an additional language

A learner may benefit from extra time during assessments that are time constrained or who are using a bilingual dictionary.

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The learner's need of the dictionary does not in itself justify allowing the learner extra time, unless the learner has to refer to the dictionary so often that examination time is used for this purpose instead of answering the questions.

## Identifying learners' needs

Any adjustment to assessment should be based on the individual learner's needs to access the assessment.

The centre has a responsibility to ensure it has effective internal procedures for identifying learners' needs and that these procedures comply with the requirements of disability and equal opportunity legislation.

A centre may choose to use the following guide:

- Identify those learners who are having difficulties or are likely to have difficulties accessing assessment

A learner should be encouraged to make any access-related assessment needs known to the centre at the earliest opportunity, and preferably before they are registered or entered for a qualification. To assist with the early identification of learners with access-related assessment needs, the centre should ensure that all staff who recruit, advise or guide potential learners have had training to make them aware of access-related issues. Once the learner's need has been identified, it should be documented for audit purposes.

- Identify whether reasonable adjustments may be needed

Relevant centre staff should decide, in conjunction with the learner, whether he or she will be able to meet the requirements of the assessment or whether adjustments will be required. It is important that the learner is involved in this discussion as he or she knows best what the effect of their particular disability or difficulty is on how they do things. Where the implications of a particular difficulty are unclear, the centre should make use of specialist advice in order to determine how the difficulty will affect the learner's performance in the assessment. The centre should avoid making assumptions, on the basis of previous experience, about whether adjustments may be necessary. Judgments should be made on the basis of individual need. If an adjustment is needed, it should be documented for audit purposes.

- Identify the appropriate adjustment

When identifying which adjustments the learner will need in the assessment, centre staff should take into consideration the learner's normal way of working, history of provision during teaching and during informal assessments and the assessment requirements of the qualification. Certain simple adjustments may be all that is required, eg adjusting seat height or providing an arm rest, etc. The same learner may not require the same adjustment for all types of assessment. Different qualifications make different demands. For example, a dyslexic learner may need

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extra time to complete a written test, but may not need extra time for a purely practical activity. Once the adjustment has been identified, it should be documented for audit purposes.

- Ensure that the adjustment is in accordance with the guidelines in this policy

The centre must ensure that the adjustment will not impair the ability to assess the learner's performance, skill or knowledge fairly in each assessment.

### Identifying and obtaining supporting evidence

Any application for an adjustment to assessment must be supported by evidence which is valid, sufficient and reliable using the form at the back of this policy.

In order to ensure that any adjustment to assessment will only provide the learner with the necessary assistance without giving him or her an unfair advantage over others, the centre must be clear about the extent to which the learner is affected by the disability or difficulty.

Where the centre can verify evidence of the disability or difficulty and where the implications are clear, such as for a learner with physical difficulties, profound hearing impairment or who are registered as blind or partially sighted, the centre does not need to provide further evidence of these physical difficulties.

Where the implications of the difficulty are not obvious, such as for learning difficulties, or mental health difficulties, the centre will have to provide additional evidence of the effect of the impairment on the learner's performance in the assessment. Any of the following types of evidence would be acceptable. The centre should decide which of these will best assist understanding of the learner's situation.

- ***Evidence of assessment of the learner's needs in relation to the particular assessment, made within the centre by the relevant member of staff with competence and responsibility in this area; staff include learning support staff, teaching staff, trainers, assessors and other specialist staff.***

If necessary, external experts may be called upon to assess the learner. This evidence should include an indication of how the centre plans to meet the learner's needs and should show that the learner can cope with the level and content of the assessment. The evidence should be documented for audit purposes. Information from previous centres attended by the learner may also be included.

- ***History of provision within the centre.***  
This should include information about the support received by the learner during the learning or training programme and during formative assessments. Evidence of the way in which the learner's needs are being met during the learning programme should be documented for audit purposes.
- ***Written evidence produced by independent, authoritative, specialists.***  
This could take the form of medical, psychological or professional reports or assessments. These reports should state the name, title and professional credentials

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of the person who carried out the assessments and wrote the report. The report should set out the nature of the difficulty and extent to which the learner is affected by the difficulty, including the effects of any medication that the learner may be taking. In cases where it might be expected that there could be changes in the way the learner is affected by the difficulty, there will have to be recent and relevant evidence of assessments and consultations carried out by an independent expert.

A learner with a Statement of Special Educational Need does not automatically qualify for reasonable adjustments. The demands of the qualification should be taken into account. The reasons for the statement may have only limited effect on achievement in the assessment.

It is the centre's responsibility to ensure that all applications for reasonable adjustments are based on the individual need of the learner and that the evidence in support of the application is sufficient, reliable and valid. A centre should maintain records of all cases for audit purposes and to monitor the effectiveness of the reasonable adjustments that have been made.

### Range of reasonable adjustments

The Permissions Table (in Appendix 1) lists the most commonly requested adjustments to standard assessment arrangements. It is not intended to be a comprehensive list and centres have a duty to seek advice from HFMA in any case where they do not consider that they have the necessary expertise to judge whether a reasonable adjustment is needed, and/or how it should be applied.

Centres should note that:

- not all the adjustments to assessments described below will be reasonable, permissible or practical in particular situations. If in doubt, the centre is advised to contact HFMA for advice. In some circumstances it may be more appropriate to select an alternative assessment task for the learner.
- the learner may not need, nor be allowed, the same adjustment for all qualifications. Some learners may need a single adjustment; others may require a combination of several adjustments.
- adjustments to assessments will mostly be needed for assessments which are taken under constrained/examination conditions.

The list of reasonable adjustments is organised under the following headings:

- Changes to assessment conditions
- Use of mechanical and electronic aids
- Modifications to presentation of assessment material
- Alternative ways of presenting responses
- Use of access facilitators

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## Use of mechanical, electronic and technological aids

### Use of assistive technology, for example speech/screen reading software and voice activated software

- Some learners may benefit from the use of software that reads the assessment material to them and records their spoken responses.
- Speech software should not be allowed for qualifications where reading is the competence being assessed. Elsewhere, and especially in vocational areas, such software may be used to allow learners to have access to assessments that are appropriate for them and enable them to show their proficiency
- The centre should ensure that the use of assistive technology will not invalidate the assessment requirements or give the learner an unfair advantage. Due to the rapid development of such technology, centres should seek advice from HFMA if the implications of using certain kinds of assistive technology are unclear.
- It should be noted that the use of such software may introduce a hidden assessment agenda, in that the learner has to master the use of the software in addition to mastering the assessment criteria. Some learners may need extra time if they use such software.

#### Summary:

- The learner should be familiar with how the assistive technology works.
- The assistive technology should not give the learner an unfair advantage over other learners or invalidate the assessment criteria.

### Use of bilingual dictionaries or bilingual translation dictionaries (manual or electronic)

- The use of bilingual dictionaries and bilingual translation dictionaries (including BSL/English dictionaries/glossaries) can be allowed in all vocational assessments unless its use is expressly forbidden by the assessment requirements.
- An additional allowance of extra time may be permitted for timed assessments, if the centre is satisfied that the learner can cope with the subject content, but the learner's knowledge and comprehension of English, impairs his/her ability to complete the assessment within the normal time allocated,
- The centre should note that the regulatory authorities state that:

*A Learner taking a qualification may be assessed in any other language where it is one of the primary objectives of the qualification –*

*(a) for the Learner to gain knowledge of, skills in, and understanding of that language, or*

## Appendices

*(b) to support a role in the workplace, providing that proficiency in English or Irish is not required for the role supported by the qualification.*

Ofqual's General Conditions of Recognition 2011

- The centre should check the dictionaries used by the learner to make sure they do not contain notes which would give the learner an unfair advantage. Where permission is given to use electronic dictionaries, the centre must check that the equipment does not contain additional functionality that will give the learner an unfair advantage. If such functionality is present, it must be disabled or the equipment disallowed.

### Summary:

The use of a bilingual dictionary should not give the learner an unfair advantage over other learners or invalidate the assessment criteria.

## Modifications to the presentation of the assessment material

### Assessment material in enlarged format

- For paper-based assessments enlargements for paper-based assessments may be used. Examples of these include:
  - unmodified enlarged papers where the standard paper is photocopied from A4 to A3, thus enlarging the whole paper and retaining the original layout and visual presentation.
  - modified enlarged paper where the paper is modified by simplifying the layout and where necessary reducing the content while still meeting the same objectives as those tested in the original paper.
- Where HFMA is able to provide externally set assessment material in enlarged format, the centre must apply not later than ten weeks before the date of the assessment.
- Where the centre is permitted to make the enlargements to externally set assessment material, it should take responsibility for the security of the material and for ensuring that the entire document is enlarged. The learner may be penalised for any errors in his/her work which occur as a result of incomplete enlargement of the material.
- Centres should note that assessment material containing scale diagrams cannot be enlarged.
- It is the centre's responsibility to provide centre-devised assessment material/resource or reference material in a suitable format for the learner.

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## On-screen assessments

- If the default font and text size used for an on-screen assessment is not suitable for the learner, screen magnification software programmes may provide an option to magnify the text to a suitable size. Advanced screen software programmes used by HFMA provide options to change screen colours and fonts.

### Summary:

- Where appropriate, the centre should meet HFMA 's deadlines for requesting enlarged assessment material, normally not later than ten weeks before the date of the assessment.
- In cases where the centre is permitted by HFMA to enlarge assessment material, the centre should take responsibility for the security of the material and for ensuring that the entire document is enlarged.
- learners should become familiar with the ways the screen may be adapted in onscreen exams by using the practice tests.

## Assessment material in Braille

- Assessment material may be provided in Braille for a blind or visually impaired learner.
- The material will be modified to remove any visual content prior to brailleing.
- Diagrams in the assessment material can be produced as tactile diagrams.
- Where HFMA is able to provide externally set assessment material in Braille, the centre must apply not later than 10 weeks before the date of the assessment. If Braille assessment material has been ordered, but is no longer required, the centre should inform HFMA immediately as any costs incurred in producing such material may be passed to the centre.
- Permission may be given to the centre to Braille externally set assessment materials. HFMA will advise when this can be permitted.
- Where the centre is permitted to Braille externally set assessment material, it should take responsibility for the security of the material and for ensuring that the entire document is brailled. The learner may be penalised for any errors in his/her work which occur as a result of errors in the brailled material.
- Braille is not always an appropriate adjustment for the learner, not all blind people are fluent in Braille.
- It is the centre's responsibility to arrange for the brailleing of centre-devised assessment material/resource or reference materials.

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## Summary:

Where appropriate, the centre should meet HFMA 's deadlines of not later than ten weeks before the date of the assessment for requesting brailled assessment material.

In cases where the centre is permitted by HFMA to braille assessment material, the centre should take responsibility for the security of the material and for ensuring that the entire document is brailled.

## Language modified assessment material

- The carrier language in assessment material may be modified for a deaf learner whose first language is either English or British Sign Language (BSL). In either case, the learner's English may be limited and modified assessment material may be necessary. BSL is a language in its own right and has its own grammar, syntax and vocabulary and written assessment material will have to be modified for most deaf learners for whom BSL is their first language.
- Technical language may not be modified. The modified version of the assessment material should contain the same questions as the standard version and the same answers will be expected from the learner.
- In listening tests, a transcript of the test may be provided, which can be read to the learner by a live speaker. This will enable the learner to lip-read the text.
- Where HFMA is able to provide language modified externally set assessment material, the centre will have to apply not later than 10 weeks before the date of the assessment.
- Where the centre is permitted to modify externally set assessment material, they should take responsibility for the security of the material and for the accuracy of the modification. The learner may be penalised for any errors in his/her work which occur as a result of inaccurate modification of the material.
- It is the centre's responsibility to arrange for the modification of centre-devised assessment material/resource or reference materials.

## Summary:

Where appropriate, the centre should meet HFMA 's deadlines for requesting language modified assessment material, normally not later than ten weeks before the date of the assessment.

In cases where the centre is permitted by HFMA to modify assessment material, the centre should take responsibility for the security of the material and for the accuracy of the modification.

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## Assessment material in BSL (British Sign Language)

- Where the centre cannot provide a BSL/English interpreter for the assessment, and if language modified assessment material does not provide sufficient assistance, a BSL version of assessment material may be provided on DVD instead of (or in addition to) the assessment material in written English. This facility may not be permitted for assessments where reading or listening is the competence being assessed.
- Where HFMA is able to provide externally set assessment material in BSL, the centre will have to apply not later than 10 weeks before the date of the assessment.
- Where the centre is permitted to translate externally set assessment material into BSL, they should take responsibility for the security of the material and for the accuracy of the translation. The learner may be penalised for any errors in his/her work which occur as a result of errors in the material.
- It is the centre's responsibility to arrange for the translation of centre-devised assessment material/resource or reference materials into BSL.
- Centres should note that translation of centre-devised assessment material/resource or reference materials into BSL will not be suitable for all assessments and that they need to contact HFMA for further advice if they are unclear whether this adjustment is appropriate.
- Centres should read the guidance for BSL/English interpreters in conjunction with this section.

### Summary:

- The centre should meet HFMA's deadlines for requesting assessment material in BSL, normally not later than ten weeks before the date of the assessment.
- In cases where the centre is permitted to translate the assessment material into BSL, it should take responsibility for the security of the material and for the accuracy of the translation.
- The centre should provide sufficient playback equipment that is in full working order.

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## Assessment material on coloured paper

- It is the centre's responsibility to provide centre-devised assessment material/resource or reference material on coloured paper, if required.

### Summary:

- Where HFMA is able to provide externally set assessment material on coloured paper, the centre will have to apply by the deadlines set by HFMA normally not later than ten weeks before the date of the assessment.
- Where the centre is permitted to photocopy externally set assessment material onto coloured paper, it should take responsibility for the security of the assessment material and for ensuring that the entire document is copied.
- The learner may be penalised for any errors in his / her script which occur as a result of incomplete copying of the document.

## On-screen assessments

- Learners may normally be able to select a screen background in a colour that is suited to their needs. It is advised that learners explore the selection available using the practice test before they take an assessment.

### Summary:

- Where appropriate, the centre should meet HFMA's deadlines for requesting externally set assessment material on coloured paper, normally not later than ten weeks before the date of the assessment.
- Where the centre is permitted to modify the assessment material, it should take responsibility for the security of the assessment material and for the accuracy of the modification.

## Assessment material in audio format

- Where there is evidence of need, assessment material may be provided in audio format. This facility is not available if reading is the competence being assessed or if the assessment material has visual content that is crucial to the understanding of the questions, such as illustrations, tables, diagrams or sketches.
- Where HFMA is able to provide externally set assessment material in audio format, the centre will have to apply not later than 10 weeks before the date of the assessment.
- Where the centre is permitted to produce an audio version of externally set assessment material, they should take responsibility for the security of the material and for ensuring that the recording is accurate. The learner may be penalised for any errors in his/her work which occur as a result of errors in the recording.

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- It is the centre's responsibility to provide centre-devised assessment material/resource or reference material in a suitable format for the learner.

### Summary:

- Where appropriate, the centre should meet HFMA deadlines for requesting assessment material in audio format, not later than ten weeks before the date of the assessment.
- Where the centre is permitted to produce an audio version of the assessment material, they should take responsibility for the security of the material and for ensuring that the entire document is copied.
- The centre should ensure that sufficient playback equipment is provided in full working order.

### Alternative ways of presenting learner responses

A learner should be provided with the means to present their responses by the method most appropriate and familiar to them, as long as the use of methods will not invalidate the requirements of the assessment. The use of ICT is generally perceived to have a positive impact on helping learners to access assessment.

The guidance given below relates to the use of ICT in written assessments. ICT can normally be used for centre-devised and portfolio work unless the use of ICT is expressly prohibited by the qualification specification.

### Spoken responses using electronic recording devices, for example CD ROMs, memory sticks, audio cassettes

- Where there is evidence of need, the learner may be permitted to record their responses electronically.
- Spoken responses will only be available for assessments where there is no requirement for the learner to produce visual material.
- Where the learner's responses are recorded electronically, the centre should provide an authenticated transcript on paper of the learner's responses.
- It will be the centre's responsibility to ensure that the transcript is an accurate reflection of the learner's responses and to keep this and the original recording as a record of the assessment.

### Summary:

- The centre should check whether permission should be sought from HFMA to record the learner's responses electronically.
- Recording the learner's responses electronically should not be allowed where it will invalidate the assessment requirements.

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- The centre should ensure that the appropriate recording equipment is provided in full working order.
- The learner using recording equipment should be accommodated separately, with separate invigilation, where its use will not disturb other learners.

### Responses in BSL

- Where there is evidence of need, the learner may be allowed to sign their responses to questions.
- Signing of responses should not be permitted if the ability to write or speak English, Welsh or Irish (Gaelige) is being assessed.
- A learner can sign full responses in BSL. Where the learner is required to show knowledge of an expression / name in their response, this must be finger spelt.
- The centre will provide a paper translation of the responses for validation purposes.
- The centre should ensure that the person doing the translation is appropriately qualified.
- Where the centre provides a transcript of the learner's response, the centre should ensure that the transcript is authenticated and an accurate reflection of the learner's responses. The centre should keep this as a record of the assessment.

#### Summary:

The centre should check whether permission should be sought from HFMA to sign the learner's responses

### Responses in Braille

- Where there is evidence of need, a learner may be permitted to present their responses in Braille.
- In these cases an authenticated paper transcript of the learner's responses should be provided by the centre.
- It will be the centre's responsibility to ensure that the transcript is an accurate reflection of the learner's responses and to keep the transcript for their records.

#### Summary:

- The centre should select a transcriber with the required level of skill in Braille and fully brief him / her on their responsibilities.

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## Section 2 - Making special considerations

We will review the circumstances and evidence surrounding each request for special consideration to ensure that the decision made maintains the equity, validity and reliability of the assessment for the learner and does not give the learner an unfair advantage.

A learner who is fully prepared and present for a scheduled assessment may be eligible for special consideration if:

- performance in an assessment is affected by circumstances beyond the control of the learner e.g. recent personal illness, accident, bereavement, serious disturbance during the assessment
- alternative assessment arrangements which were agreed in advance of the assessment proved inappropriate or inadequate
- part of an assessment has been missed due to circumstances beyond the control of the learner
- there is a sufficient difference between the part of the assessment to which special consideration is applied and other parts of the qualification that have been achieved to infer that the learner could have performed more successfully in the assessment

A learner will not be eligible for special consideration if:

- no evidence is supplied by the centre that the learner has been affected at the time of the assessment by a particular condition
- any part of the assessment is missed due to personal arrangements including holidays or unauthorised absence
- preparation for a component is affected by difficulties during the course, eg disturbances through building work, lack of proper facilities, changes in or shortages of staff, or industrial disputes.

## Reasonable adjustments permissions table

This table outlines some of the decisions on reasonable adjustments that can be made. However, centres and external verifiers have a duty to seek advice from HFMA in any case where they are in doubt if an adjustment is needed or how it should be applied.

- Permitted – Reasonable adjustment permitted at the discretion of the centre
- Apply – Apply to HFMA for permission

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Reasonable adjustment		Assessments NOT taken under examination conditions	Assessments taken under examination conditions
Extra time up to 25%		Permitted	Permitted Permitted/ Apply *
Extra time in excess of 25%		Permitted	Apply
Supervised rest breaks		Permitted	Apply
Change in the organisation of assessment room		Permitted	Permitted
Separate accommodation within the centre		Permitted	Permitted
Taking the assessment at an alternative venue		N/A	Permitted
Use of coloured overlays, low vision aids, tinted spectacles, CCTV and OCR scanners		Permitted	Apply
Use of assistive software		Permitted/ Apply *	Apply
Use of bilingual and bilingual translation dictionaries		Permitted	Apply
Assessment Material in enlarged format		Permitted	Apply
Assessment material in Braille		Apply	Apply
Language modified assessment material		Apply	Apply
Assessment material in BSL		Apply	Apply
Assessment material on coloured paper		Permitted	Apply
Assessment material in audio format		Apply	Apply
Use of ICT		Permitted/ Apply *	Apply
Responses using electronic devices		Permitted	Apply
Responses in BSL		Permitted	Apply
Responses in Braille		Permitted	Apply
Other		Apply	Apply

\* Permitted at the discretion of the centre unless ICT is implicitly or explicitly excluded in the Standard being assessed or in its associated Assessment Strategy or Qualification Manual

# Appendices

## Glossary

Term	Definition
Access to Assessment	The removal of artificial and unnecessary barriers to the process of judging an individual's competence.
Appeal	A process through which an awarding organisation or centre may be challenged on the outcome of a decision
Assessment	The process of making judgments about the extent to which a learner's work meets the assessment criteria for a qualification or unit, or part of a unit.
Assessment criteria	The requirements that a learner needs to meet in order to achieve success (or a given grade) in a qualification or unit, or part of a unit.
Assessment method	The means by which an individual's competence is judged.
Assessment needs	The adjustments that some individuals require to the assessment strategy and/or assessment task in order to demonstrate that they can meet the required standard.
Assessment task	An activity undertaken by an individual learner to show that he or she can meet the required standard.
Assessor	The person who assesses a learner's work.
Assistive technology	Mechanical or electronic devices which help individuals with particular needs to overcome these limitations.
BSL/English interpreter	An individual who interprets communication into and from British Sign Language
Carrier language	The language communication used by the awarding organisation to set an assessment task or test (which may not be the first/preferred language of the learner)
CCTV	Closed circuit television
Centre	An organisation or consortium accountable to an awarding body for the assessment arrangements leading to a qualification or units.
Competence	The ability to perform to the required standard
Enabling technologies	See assistive technology
Externally set	Examinations or assessment tasks or assignments which are determined by the awarding body
External verifier	Person who checks that a centre's assessment and quality assurance procedures comply with the requirements of the awarding organisation and the regulators.
Invigilator	A person who supervises individuals taking an examination or assessment
Learning programme	A course of study
Oral language modifier	Person who can modify/rephrase the carrier language of an assessment for a learner whose first/preferred language is English, but who has specific difficulties with written language
Malpractice	Actions and practices which threaten the integrity of public qualifications
Moderation	The process of checking that assessment standards have been applied correctly and consistently between assessors, between centres and over time, and making adjustments to results where required to compensate for any differences in standard that are encountered.

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Portfolio	A collection of work submitted for assessment.
Prompter	Person who draws the learner's attention back to the task in hand
Practical assistant	Person who carries out practical tasks at the instruction of the learner
Reasonable adjustment	Any action that helps to reduce the effect of a disability or difficulty that places the learner at a substantial disadvantage in the assessment situation. Arrangements are approved in advance of an examination or assessment.
Risk assessment	An estimation of the likelihood of something unfortunate happening as a result of a course of action.
Scribe	Person who writes down or word processes a learner's dictated responses
Qualification specification	A detailed statement or document which sets out the aims, purpose, content, structure, and assessment arrangements for a qualification.
Standards	The combination of knowledge, understanding and skills required to perform a job or task to the level of competence required in the workplace.
Sector body	A body (such as a Sector Skills Council) recognised by the regulatory authorities as responsible for formulating and reviewing standards of occupational competence for an employment sector.
Special consideration	Procedures implemented at the time of an examination to allow attainment to be demonstrated by a learner who has been disadvantaged by temporary illness, injury, indisposition or adverse circumstances at the time of the examination.
Speech software	A computer programme that reads text
Transcript	A full written or typewritten copy of information or material originally provided in writing, speech or sign language.
Voice activated software	A computer programme which responds to spoken instructions.

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## HFMA Application for reasonable adjustments

Please note this form should be read in conjunction with the published Reasonable Adjustments and Special Considerations Policy. All sections of the form should be completed.

Please post or email the completed form for the attention of the Head of Awarding Organisation clearly marked as an application for Reasonable Adjustment.

Postal address:

HFMA  
1 Temple Way  
Bristol  
BS2 0BU

E-mail: [qualifications@hfma.org.uk](mailto:qualifications@hfma.org.uk)

Name of learner \_\_\_\_\_

Date of request: \_\_\_\_\_

Candidate number \_\_\_\_\_

Unique learner number (if obtained) \_\_\_\_\_

Module/qualification for which Reasonable Adjustment is being requested:

\_\_\_\_\_

Date of assessment

\_\_\_\_\_

Name of person completing the form (if not the learner):

\_\_\_\_\_

Job title/position of responsibility (if not the learner):

\_\_\_\_\_

Please state:

1. The nature of the disability/learning need (please continue on a separate sheet if necessary)
2. The special assessment arrangements requested (this should be completed in conjunction with the suggested arrangements in the published policy document)

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3. Please provide any evidence to support this application (copies are acceptable). Examples of evidence could be a relevant diagnostic report or statement of learning needs or medical condition from appropriately qualified personnel.

PLEASE NOTE:

Requests for modified external assessment papers must be made at least 15 working days prior to the agreed external assessment date.

Requests for external assessment papers in Braille must be made 30 days prior to the external assessment date.

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### Office use only

Date form received: \_\_\_\_\_

Information attached? YES/NO

If no date further information requested \_\_\_\_\_

Approved? YES/NO

If no, please state reasons:

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If yes, date approved \_\_\_\_\_

Date response sent: \_\_\_\_\_

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## Special consideration form

Please use this form to apply for special consideration as defined by the special considerations policy.

Please ensure that you apply for special consideration as soon as you become aware of an issue that would require a special consideration. This form should be submitted no later than 7 days after the assessment deadline.

<b>Learner information</b>	
Learner name	
Candidate number	
Year of study	

<b>Assessment information</b>				
Module code	Module title	Type of assessment	Submission deadline	Did you attempt this work?

<b>Special consideration</b>
Please set out clearly and concisely details of the circumstances that you believe have affected your performance in the assessment:
Please provide the precise details of the period(s) affected by your circumstances:
Please list the supporting evidence you have attached to this form in support of your application for special consideration:

Date of submission of this form:
Signature:

# Appendices

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## Office use only

Date form received: \_\_\_\_\_

Information attached? YES/NO

If no, date further information requested \_\_\_\_\_

Approved? YES/NO

If no, please state reasons:

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If yes, date approved \_\_\_\_\_

Date response sent: \_\_\_\_\_