

KENYA INSTITUTE OF SUPPLIES MANAGEMENT

DRAFT ACCREDITATION POLICY STAKEHOLDER FEEDBACK REPORT AS PER THE STAKEHOLDER MEETINGS HELD ON 12-16 JULY 2021.

	SECTION	FEEDBACK FROM STAKEHOLDERS	COMMENTS BY PSC & THE INSTITUTE
1	POLICY STATEMENT	<p>1.1: There was a comment that the policy statement had been well captured but there was need to highlight or make reference to the section of SPMA where the Policy Statement and document were anchored.</p> <p>1.2: A member enquired about whether there was proper anchorage or basis of the document in SPMA; adding that the objective should have been to ensure that licensed individuals and firms were regulated and were providing quality services to consumers of PSCM consultancies and training.</p>	<p>1.1.1: The PSC responded that Continuous professional development of PSCM professionals was premised on the Supplies Practitioners Management Act No. 17 of 2007 (SPM Act) and the Suppliers Practitioners Management (Registration and Licensing) Regulations 2015), which provided a legal framework for promoting procurement and supply chain management professionalism through establishing, monitoring, improving and publishing standards of PSCM practice and providing continuous professional development.</p> <p><i>Further, SPMA section 16 (10) “A member of the Institute shall be required to undergo such continuous professional development programmes as may be prescribed by the council”. Since the Institute may not train all the professionals in the country on its own, it recommends other professional courses by other registered trainers by way of accrediting qualified firms and allowing them to mount training programs as partners of the Institute subject to meeting the laid-out criteria (Application for accreditation form). Such accredited courses</i></p>

		<p>1.3: A member urged that focus needed not to be on collaborating with partners as there was no provision for such collaboration and Partnership in the SPM Act or Regulations.</p>	<p><i>qualify for CPD points by the Institute.</i></p> <p><i>Accredited service providers are not allowed to sub-contract training service to third party service providers. The approved courses are essentially accredited on their own merit and given a specific accreditation number.</i></p> <p>1.3.1: Agency partnership engagement by the Institute is provided for under the SPMA Section 7 whereby “Subject to this Act, the Institute may generally or in any particular case delegate to any committee of the council or to any member, officer, employees or agent of the Institute”.</p>
2	ACCREDITATION OF COURSES	<p>2.1: The Institute ought to redefine the word accreditation to incorporate all accredited institutions to avoid bias and discretion.</p>	<p>2.1.1: The essence of accreditation was to give The Institute an opportunity to collaborate with other service providers in providing CPD programs to its members while maintaining the quality of the trainings.</p> <p>This would enable The Institute prescribe CPD programme to all members as per the Registration and Licensing Regulations</p> <p>For clarity terms below are defined in this policy:</p> <ol style="list-style-type: none"> 1. Licensed firm 2. Accredited firm 3. Accredited course
3	THE ACCREDITATION APPLICATION FORM & SANCTIONS	<p>3.1: A suggestion that the Institute considers doing away with sanction no.3.9.2, 3.92 and 3.9.5</p>	<p>Sanctions, in the The Institute Draft CPD Policy, are a creation of the SPMA (Section 29-32)</p> <p>The forms below will be available in regards to accreditation:</p>

			<ol style="list-style-type: none"> 1. Application for Firm Licencing Form 2. Application for Firm Accreditation Form 3. Application for Course Accreditation Form <p>Applicable fees as prescribed in forms 1. and 2.</p>
4	ACCREDITATION FEES and CPD AWARD	<p>4.1: A member enquired about how members paying back fees was beneficial to a member or if the Institute was a money-making machine where money gave membership and accreditation?</p> <p>4.2: A member suggested that the fee of 100,000/= be completely removed but, if necessary, a token fee of 20,000/= be levied. Further advice-if the fee was waived, then the remittance of KS. 1000 be increased to 1500/=</p> <p>4.3: An enquiry was made into the value that the charges would add?</p> <p>4.4: An enquiry was made into the basis and rationale for paying Kshs.1000 and What it was pegged to.</p>	<p>4.1.1: It was submitted that the fee charged by Institute meets administrative costs. Allowing back fees is a way of helping members obtain good standing status, if lost at some point. The back fees promote professional discipline. NB. Back fees is payable on membership renewal</p> <p>4.2.1: The fee is a benchmarked administrative fee which could either be increased or reduced as appropriate. It serves as a quality control tool.</p> <p>4.3.1: Accreditation fee is an administrative fee that enables the Institute to facilitate accreditation.</p> <p>4.4.1: The KSHS. 1000 is not accreditation fee but for actual allocation of CPD points, e essentially meeting the administrative cost.</p>

	<p>4.5: An enquiry was made into How the back fees payment-for events paid for but not delivered would be turned into CPD points that would benefit the member.</p> <p>4.6: An enquiry was made into whether one who was training for 1, 2, 3 CPDs or 30, 20, 10 CPD Points would need to pay Kshs.1000. Some members suggested it should not be paid at all, others suggesting that it should be levied on the training firm; while others suggesting it be levied on the participants.</p> <p>4.7: It was proposed that accreditation fees be differentiated in terms of independent Consultants and stable consulting firms; Ks. 100,000 and that 1000 could be exorbitant for individual/independent consultants who may not be able to mount serious trainings within a given calendar year</p>	<p>4.5.1: Back fees are not exactly turned into CPD points. However, payment of the same will allow members renew status. It will be put in record that back fees was paid in place of earning CPD points.</p> <p>4.6.1 Accredited firms should pay the CPD allocation fees of KSHS. 1,000 per trainee regardless of the CPD points the course merits</p> <p>4.7.1: The policy and the Registration form provides for accreditation of courses offered by licenced and accredited firms but not individual trainers.</p>
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		between CPD points and CPD hours was.	points and not CPD hours while promoting accredited courses The Institute recognizes CPD points and not CPD hours.
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4.14: Some members felt that a minimum fee of 130,000/= be charged for accreditation because a part from paying facilitators, the Institute continually had to ensure it is financially sound. They also noted that that the Institute was charging the minimum accreditation fees when compared to other professional institutions in the country.

4.15: A member supported the proposed 100,000/= with monitoring for adjustments after one year, if necessary.

4.16: It was suggested that the Institute considers beginning with an accreditation fee of 50,000/=: which was the regular charge for procurement agents. Further, that the figure could be incremental so that by 2-3 years, the Institute could be at the targeted KSHS 100,000. The member also noted that when the costs start piling up, they would often be passed to participants. It was also suggested that the member pays the 500/= instead of 1000/= for CPD allocation

4.17: A member suggested that the Institute looks at that fee differently for independent consultants; that the amount (KSHS. 100,000) was okay for a consulting firm but a bit impractical for an individual consultant. Also, that the consultant/consulting firm charge the accreditation cost to the training cost so that members don't have to be subjected to paying the cost.

4.18: A member encouraged the ongoing work and emphasized on looking beyond Kenya and not settle for minimums.

4.14.1 The PSC submitted that the proposed accreditation fee of KSHS. 100,000 is a starting figure that will be reviewed from time to time.

4.16 CPD allocation fee is paid by the training firm.

4.17.1: The PSC clarified that the proposal requires the training institution to pay the CPD allocation fees of KSHS. 1000, In the event that they fail, those who attended the training are required to pay the 1,000/= to the Institute before being allocated the CPD points; the trainers are encouraged to comply and avoid transferring this burden to members. This provision protects the member when the service provider defaults.

The Institute considered all the proposals for accreditation fees from stakeholder engagement as below:

1. KSHS. 100,000 (proposed by The Institute): opposed and supported by some participants
Participant proposals
2. KSHS. 50,000 with gradual increase to KSHS. 100,000 in 2-3 years
Also, decrease allocation fees from KSHS. 1,000 to KSHS. 500
3. KSHS. 60,000 supposedly what KASNEB charges
4. KSHS 130,000 for financial sustainability of the Institute

Based on the above the below conclusion was arrived at:

1. Annual Accreditation Fees: KSHS.100,000-one off annual fees
2. CPD Allocation Fees: KSHS: 1,000 per trainee of an accredited course; payable by the training firm.

5	Conflict of Interest	<p>5.1: An enquiry was made into whether the council members were allowed to engage in consultancy and where the boundaries for avoidance of conflict of interest are were drawn.</p> <p>5.2: A member noted that The Institute was clearly conflicted (as regulator, a registrar, a licencer, a trainer, a QA supervisor, and a competitor, a collaborator and cost controller) and urged that THE INSTITUTE really recognises that many of the activities in the process would amount to conflict of interest and only add costs to the training programs.</p> <p>5.3: An enquiry was made into how The Institute would avoid conflict when asked to quote for In-house and Independent providers are also asked.</p>	<p>5.1 Council does not engage in CPD training of members hence no conflict of interest on the part of the council.</p> <p>5.2.1: The SPMA gives The Institute outright mandate to carry out capacity building of SCM professionals. SPMA is “An Act of parliament to make provision for training, registration and licencing of supplies practitioners; regulate their practice and for connected purposes” Further, SPMA section. 16(10) and Section. 5(a) and (b), (f) stipulate the clear mandate of the Institute in regards to prescribing CPD programme. There is clearly no conflict of interest as per Institute’s mandate.</p> <p>5.3.1: The Institute is free to submit quotes for competitive selection of training service providers as it is one.</p>
7	CPD Control	<p>7.1: An enquiry was made into who controls the quality of CPD programs The Institute delivers to its members.</p> <p>7.2: An enquiry was made into when The Institute would most likely receive the automated system to enable members to check the acquired CPD points.</p>	<p>7.1 The Council through the PSC is responsible for ensuring quality of training programs at The Institute. CPD courses offered by The Institute are anchored on SPMA Section. 16(10)</p> <p>7.2.1: The automation process was in advanced stage by the time of this stakeholder engagement. By the end of the year, a seamless system that works and serves the members fully was projected to have been established. Further, members were informed that information had been sent out to members to activate their self-service portal and update details that may have changed since their registration. For</p>

			CPD enquiries before the self-service portal was ready, members were encouraged to drop emails to programs@kism.or.ke and be furnished with information on CPD status.
8	CPD Trainings accreditation	<p>8.1: A member observed that CPD training, universally, is never exclusively carried out by persons who identify themselves as trainers or are accredited as such, rather, and to a large extent, they are carried out by qualified working professionals invited to facilitate programs. They also noted that CPD programs are labelled “professional programs” due to the fact that they are delivered by “practicing professionals” who may or may not be accredited trainers; rarely are they expected to be accredited trainers. The member concluded that the approach runs contrary to the intention of licensing of professionals as espoused in the SPMA 2007</p>	<p>8.1.1 The PSC submitted that:</p> <ol style="list-style-type: none"> 1. The Institute trainers are licensed and competitively recruited annually from amongst members who are practitioners through an advertisement on major media outlets. 2. For one to be a The Institute trainer, professional qualifications and practicing experience is key. 3. Individual trainers are not accredited to offer courses on their own, accreditation applies to firms offering training with the intention of having members earn CPD points. 4. Individual trainers contracted by The Institute or other training firms must be licenced members of the Institute. 5. Licenced members and firms can carry out training as they wish. Accreditation comes in when such firms wish to have their trainees earn CPD points from the Institute.
		<p>8.2 A member observed that most trainings were conducted in high end areas like Kisumu, Eldoret and the likes and asked what the Institute was doing to ensure trainings are also done in Kakamega, Bungoma and such other regions</p>	<p>8.2.1: Regional based workshops are incorporated in the 2022 CPD training calendar. Members were urged to mobilise other members from their regions to attend such workshops when they are brought closer to them.</p> <p>The The Institute consultancy hub and regional chapters are designed to take The Institute services closer to its members (The Institute Mashinani).</p>

9	Accreditation as a Mandatory Requirement for Trainers	<p>9.1: A member proposed that while it is in order for The Institute to implement its own internal program for accrediting its trainers, it is irregular to require that all registered and licensed practitioners also be accredited as The Institute trainers in order to facilitate professional programs. The member further observed that this is limiting and will only serve to lower standards in training; that some of these requirements are impractical even for The Institute to fulfil for its own training programs. The member advised that The Institute not ask Training firms to provide information that The Institute cannot itself provide with sincerity.</p>	<p>9.1.1</p> <ol style="list-style-type: none"> 1. It is not a requirement that all registered and licenced members are accredited. Indeed, The Institute does not accredit individuals to mount courses independently. 2. The accreditation of facilitators cited in the policy is for trainers of The Institute's courses. The process of onboarding such (accrediting) is first by Expression of Interest, shortlisting, selection and TOT. 3. Individual consultants contracted by The Institute or other training firms must be licenced members of the Institute.
10	ACCREDITATION OF TRAINERS	<p>10.1: There was a suggestion to include independent trainers for in-house trainings.</p> <p>10.2: An enquiry was made into how we can access the list of approved consultants by The Institute.</p> <p>10.3: An enquiry was made into what the accreditation fees for individual consultants is; The member further suggested that fee charged for individual consultants should be lesser or half of that charged to established firm</p> <p>10.4: An enquiry was made into how long the validity</p>	<p>10.1.1 All members are given an opportunity to express interest to train in THE Institutes in-house or otherwise programs. The selection of such trainers is transparent and competitive.</p> <p>10.2.1 Lists of licenced firms & individuals, accredited institutions & accredited courses as well as The Institute accredited trainers will be uploaded in the website once the Accreditation policy is fully in place.</p> <p>10.3.1 The Policy does not provide for accreditation of individuals for purposes of mounting CPD courses independently.</p> <p>10.4.1 The firm accreditation validity period is one calendar year. The Institute</p>

		period for accreditation for CPD providers is.	follow the calendar year, January to December.
11	Accreditation and Licensing of Professionals	<p>11.1: A member sought to know where the Institute’s training procedures are and how they link with the CPD policy as that wasn’t not clear.</p> <p>11.2: A member submitted that a license issued to a professional empowers that professional to both practice and coach/mentor/teach; that this is intended to put PSCM at par with other professionals; Doctors, Lawyers, Accountants etc. are licensed to practice and by virtue of such licensure, they can coach, mentor, teach, and build capacities in their professional colleagues. He further argued that in the case of The Institute practitioners are licensed but they are not allowed to coach, teach, mentor or capacity build fellow professionals unless they are again accredited by The Institute – the member submitted that this requirement dilutes the value of The Institute Licensing and amounts to double-licensing/taxation of members (The definition of practitioner by SPMA does not encompass areas of lecturing)</p> <p>11.3: A member proposed That THE INSTITUTE could seek to enhance the vetting that takes place at the Licensing step so that only the qualified members are issued with practicing licences.</p>	<p>11.2.1: The Institute is developing a Training Manual which will have all the training policies, procedures and processes documented. The manual will be ready by the end of the second quarter of 2022.</p> <p>11.2: A licenced practitioner is by the SPMA allowed to carry out supply chain business which may include coaching, mentoring, teaching, and building capacities to their professional colleagues as mentioned. The accreditation comes in when training service providers seek CPD points for their trainees, in this case the PSC is concerned about the training standards which must mirror the quality that The Institute offers for award of CPD points. Even after accreditation, trainers contracted by the service providers are required to be licenced members of the Institute.</p> <p>11.3.1 Licensing of firms is guided by SPMA Section. 20 3 (a) and (b). The licencing process at the Institute is quite rigorous ensuring that only qualified and experienced members are licenced. Attempts by unqualified persons to obtain licences would be treated as disciplinary matters. SPMA (Registration & Licensing)</p>

		<p>11.4: A member proposed that The Institute Considers including system review advisories as best practice in supply chain management.</p>	<p>regulations, 2015 Section 7 (Request for further information) and Section 8 (Refusal</p> <p>11.4.4: Accounting Officer is obligated to put in place and constantly review systems that support SCM in their organisations.</p>
12	ACCREDITATION OF FIRMS	<p>12.1: An enquiry was made into how the Institute intends to accredit and license corporate bodies to carry out CPD activities that the Institute will acknowledge.</p> <p>12.2: A member submitted that trainees and organizations require long term planning and that The Institute would need to approve long term programs for training firms.</p> <p>12.3: A member suggested that The Institute makes it mandatory for training firms to seek accreditation with The Institute before mounting any training programme.</p>	<p>12.1.1 Accreditation guidelines will be as per this draft policy document</p> <p>12.2.1: PSC strives to review applications for accreditation as soon as possible as long as all documents are in order. Accredited firms need plan and make application for accreditation in good time as stipulated in the application forms.</p> <p>12.3.1: Course accreditation is done before mounting the course. Members trained by firms conducting trainings without accreditation from The Institute would not be awarded CPD points from such courses.</p> <p>12.3.2 Pre-accreditation is compulsory for firms seeking CPD points for their trainees. The application form gives guidelines on application lead times</p>
13	IN-HOUSE TRAININGS (In-house trainings conducted by Registered Institutions and Independent Trainers)	<p>13.1: A member noted that unless it is for purposes of filling spaces, there is no guarantee that 100% of resource facilitations assigned lead trainer roles programs in six- or twelve-months' time will be available.</p> <p>13.2: An enquiry was made into whether the</p>	<p>13.1.1 Planned quality checks would ensure compliance to accreditation guidelines. Changes in facilitators should be communicated to the Institute in good time.</p> <p>13.2.1: Yes, with the exemption of when</p>

		<p>accreditation of the program is invalidated when the program doesn't take place.</p> <p>13.3: An enquiry was made into how individual trainers or organizations offering in house trainings would know about the requirements as this will be done on a need basis after Training Need Assessment (TNA)?</p> <p>13.4: A member proposed that the proposed quality checks be a role for the institute and at the cost of The Institute since The Institute has a statutory role to members and trainers.</p> <p>13.5: An enquiry was made into whether PSC should be evaluating such In-houses and yet they are quoting for the same.</p> <p>13.6: A member submitted that in-house trainings are often much customised and that bureaucratic processes by PSC ought not to delay preparations for the same by the private firms.</p>	<p>the service provider notifies of any changes in delivery period in good time.</p> <p>13.3.1 Any firm or individual seeking CPD points with the Institute will be given the necessary details. The final CPD and Accreditation Policies will be availed on The Institute website.</p> <p>SPMA Section. 16(10) and Section. 7</p> <p>Addressed in 5.3.1 of this report</p> <p>SPMA Section. 16(10) and Section. 7. In principle all firms offering CPD training programs ought to be licensed and accredited by the Institute.</p>
14	QUALITY CONTROLS	<p>14.1: A question was posed about what quality control is and the member submitted that it isn't necessary since the trainers and firms are accredited. The course programs are pre-approved; and that this makes the whole thing very expensive and punitive.</p> <p>14.2: A member argued that the Institute finds other means of doing the "Quality Assurance (QA) business" besides their expensive QA visits which are nothing but spying exercises by its staff.</p> <p>14.3: A member submitted that The Institute is a regulator, a trainer and an accreditor hence The</p>	<p>14.1.1: SPMA Section 5 gives the functions of the Institute and specific to part (a), "the Institute shall establish, monitor, improve and publish the standards of the supplies practitioner's profession and safeguard the interest of tall supplies practitioners."</p> <p>The Council (as per the above mandate) through its Professional Standards Committee is responsible of quality management of Institute's programs as well all certified courses offered by the accredited service providers.</p>

		<p>Institute needed to clarify about who would control The Institute in terms of quality of output of trainings as The Institute controls other trainers, as well as who will be checking QA for The Institute programs. The member proposed that the best thing to do to avoid biases would be for The Institute and Training firms to agree on an independent QA verifier and evaluator of performance who would be appointed through an independent tender and would be paid from the fee of KSHS. 100,000 and 1,000 (That The Institute would need to cater for its quality assessors, if any). The member recommended that this doesn't become an additional cost to the trainees since these costs were going to be borne by participants. The member added that The Institute is creating a gravy train for its staff and that the best judge for QA from a training program would be participants and the employer who consume services from Trainers.</p> <p>14.4: A member noted that program design and content is proprietary to the developer and sought to know what assurances/guarantees The Institute could provide to developers of such programs to reassure them, that The Institute will not plagiarize and/or incorporate into its own programs, the information that it obtains from developers of competing programs.</p> <p>14.5 A member submitted that considering That the Institute is a public body under The National Treasury, introducing exorbitant fees (which may be considered as taxes) is not tenable and goes against established policies and practices of public finance.</p>	<p>14.5 Public Finance law is not infringed when the Institute is carrying out its mandate. In case of conflict, the PPDA supersedes.</p>
15	ACCREDITATION COMMITTEE	<p>15.1: An enquiry was made into the composition of the professional standards committee and whether it covers all sectors, from practitioners to non-practitioners.</p>	<p>15.1: Council appoints the Committee members through a competitive process. Suitability and qualifications are also adhered to. According to the SPMA first Schedule 1 (1) on the provisions as to the</p>

16.	POLICY REVIEW	16.1: How long does it take to review these policy documents?	<p>Conduct of business affairs of the Council, the Council shall establish committees as it may deem appropriate to perform such functions and responsibilities as it shall determine.</p> <p>16.1.1 3 Years or as need arises, whichever comes first.</p> <p>16.1.2: Reviews may be necessitated by change in law, changes in the macro and micro-operating environment, suggestion by the council, reviews in laws & regulations and interest of members</p>
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