

Module 3 – Evidence and Award Writing International Arbitration

September to December 2026



2026 VIRTUAL TRAINING PROGRAMME

COURSE INFORMATION SHEET

What is the aim of the course?

The course is aimed at providing candidates with the knowledge required to understand and consider evidence, to weigh it up and analyse submissions to arrive at a conclusion and to write a final, reasoned and enforceable arbitration award in compliance with the United Nations Commission on International Trade Law (UNCITRAL) Model Law, regional arbitration law and the UNCITRAL Arbitration Rules.

The course focuses on the processes followed by an arbitrator in defining the issues that have to be decided by an award, dealing with the submissions made by the parties, analysing the appropriate law, evaluating the evidence, applying the law to that evidence, arriving at a conclusion and then writing a final, reasoned and enforceable award.

It is therefore valuable for anyone wishing to understand the processes involved in award writing. It is an essential requirement for qualification as a Fellow of the Chartered Institute of Arbitrators (Ciarb) and for those who aim to practice as international arbitrators. Ciarb membership provides a world-class qualification demonstrating excellence in ADR. Becoming a Fellow demonstrates completion of Ciarb's world-renowned training programme.

What is covered within the syllabus?

Through private study and virtual lectures and tutorials, candidates will learn and gain knowledge of:

- The basic concepts and types of evidence
- The rules of evidence in arbitration
- Assessing evidence including hearsay
- The burden and standard of proof in evidence
- Privilege and disclosure in written evidence
- The types and treatment of witness evidence, including expert witness evidence
- The purpose and legal and substantive requirements of the award, including the need for plain language
- The identification of issues for determination, reasoning and decision-making in the award
- The structure, form and publishing of the award

What are the learning outcomes?

On successful completion of this course, candidates will be able to: demonstrate sound conceptual, technical and practical knowledge of:

- Recognising and evaluating evidence
- Distilling the issues that arise from the parties' submissions
- Structuring and dealing with all the issues that arise
- Deciding matters in dispute logically and in accordance with the law
- Structuring and writing the award correctly
- Writing the discursive and operative parts of the award
- Allocating arbitrator's fees and expenses
- Dealing with the parties' costs and interest
- Demonstrating compliance with the legal and other requirements for an enforceable award

What are the entry requirements?

The entry requirements are successful completion of the assessments in (i) Ciarb Module 1 – Law, Practice and Procedure of International Arbitration OR Ciarb Accelerated Route to Membership in International Arbitration AND (ii) Ciarb Module 2 – Laws of Obligations OR Ciarb Exemption Test for Module 2.

In addition, all candidates who have not previously received training in the Pathways programme will be required to have a minimum of five years' professional workplace experience as, for example, a lawyer, surveyor, accountant, insurer, shipbroker or similar. This experience must involve communicating with others, problem-solving, managing workloads effectively, decision-making and the exercise of judgement.

Training and assessment are carried out in English. It is therefore essential that candidates enrolling on the course are proficient in both written and spoken English. Ciarb does not require any evidence of this proficiency and it is the candidates' responsibility to ensure that their English language skills are adequate for the course and assessment for which they have applied.

What is the enrolment process?

To enrol on the course, submit the completed Registration Form, along with evidence to support the aforementioned entry requirements, to the Course Administrator at info@ciarbcaribbean.org **NO LATER THAN 14 AUGUST 2026**. Upon successful registration on the course, candidates will receive confirmation that they are provisionally booked on the course, subject to full payment of the course fee, and instructions on how to pay the fee by wire transfer to the Ciarb Caribbean Branch London Bank Account. **Wire transfer is the only method of payment.**

Upon payment of the fee, registration will be confirmed. Candidates will receive joining instructions, access to course materials and the course schedule by email.

What is the course fee and what does it include?

The course fee is GB£900.00 and includes registration, study materials, access to virtual classrooms, tuition and assessment.

How is the course delivered?

The course is delivered over a period of three months with a combination of private study and virtual lectures and tutorials. Private study includes reading course materials and undertaking self-assessment tasks in the candidates' own time. Virtual lectures and tutorials involve the candidates attending ten half-day virtual classroom sessions, via the Zoom online platform, on select Saturdays between 5 September and 21 November 2026 starting at 9:00 am (Eastern Caribbean Time).

Ciarb is committed to supporting candidates to be successful in their courses and to achieve successful outcomes in their assessments. The virtual classroom sessions are designed to be interactive teaching and learning experiences taught by senior tutors who will assess individual needs. Candidates therefore will be at a disadvantage if they do not attend all virtual classroom sessions and for this reason it is strongly recommended that candidates attend all scheduled sessions.

After each lecture, a password-protected recording of the lecture will be placed on the Branch's website for the candidates' use.

How will candidates be assessed?

Candidates will be assessed through a post-course written award assignment which will assess the candidates' ability, in the context of an ad hoc arbitration, to write an award as a sole arbitrator that withstands scrutiny under the New York Convention, the UNCITRAL Model Law and the UNCITRAL procedural rules.

The assignment is split into two stages:

- Stage I consists of the papers in the case. They are sufficient to enable the candidates to grasp the nature of the case study exercise and the likely legal problems. Most of the documents are extracts only. Candidates should consider the recitals they intend to include and the relevant law.
- Stage II is equivalent to the hearing stage and includes an extract from the arbitrator's notebook. This records the oral evidence and arguments the arbitrator has heard, as well as any other relevant documents. From the evidence, candidates must make their findings of fact and write their award. It must be a final award as regards the issues decided.

Stage I will be released via LearnADR, Ciarb's online learning platform, 10 days before the start of the assessment date. Stage II will be made available via LearnADR from 12 noon (London time) on the assessment start date.

Candidates will have 48 consecutive hours to complete Stage II of the assignment within a 5-day window period starting 4 December 2026 and to submit their award online via LearnADR, Ciarb's online learning platform.

Prior to the start date of the assessment period candidates must create a 'My Ciarb' account and will receive an email with instructions on how to access the assignment.

Candidates must achieve a minimum mark of 70% in Parts A and B and overall to pass this course. Part A focuses on the technical merit and counts as 40% towards the overall mark, Part B focuses on the judicial merit and counts as 60% towards the overall mark.

Part A: The award will be assessed on its **technical merit**. The drafting of the formalities and the operative part of the award are to be technically comprehensive, accurate and comprehensible.

- *Comprehensive* means that the award includes a header that names the award; identifies the parties, the arbitrator and counsel; includes an introduction that identifies the facts of the case, the arbitration agreement, the applicable laws and rules to the procedure and substance and the procedure for appointing the arbitrator; includes the procedural history, the jurisdiction, the reasoning and issues in dispute, pre- and post-award interest and costs, and a dispositive section that states the place of arbitration, the date and a signature.
- *Accurate* means that the above details are complete and accurate, including the tribunal's jurisdiction and governing parameters and that the procedural history demonstrates due process and that all parties had full opportunity to present their cases.
- *Comprehensible* means that the language, formatting and numbering do not fundamentally obscure the meaning through incoherence or ambiguity.

Part B: The award will be assessed on its **judicial merit**: All the discrete issues in the dispute are identified, analysed with an appropriate level of factual and legal rigour and effectively addressed. The findings are logically and unambiguously summarised as an enforceable award.

- *Factual and legal analysis* means that for each issue the facts and law are identified; the application of the law to the facts is explained; and a conclusion on the resulting liability and quantum is clearly articulated. Each issue is effectively addressed, whether interlocutory, preliminary, substantive or evidential.
- *Due process*: The procedural history is comprehensive from the notice of arbitration to the award. It includes representation and witnesses; demonstrates due process and that all parties had full opportunity to present their case; it leaves nothing unfinished.
- *Costs and interest*: The award consolidates the findings on costs and interest comprehensively and coherently, taking account of compliance and sequencing. It includes the arbitrator's fee, the hearing costs; procedural costs; the parties' costs and other costs.

- Scrutiny: The award is drafted to the standards required by the New York Convention and the UNCITRAL Model Law, contains the necessary facts to counter grounds for vacatur and addresses scrutiny points including defective arbitration agreements, denial of procedural fairness, improper tribunal composition and/or procedure and excess of jurisdiction.

Results are made available to candidates normally twelve weeks from the deadline date of the submission of the assignment but may be delayed.

On successful completion, candidates will be awarded a Certificate of Assessment and will be eligible to apply for Fellow grade membership of Ciarb and take advantage of a range of educational and professional benefits. Candidates are only eligible to apply for the relevant membership grade for a maximum of 2 years after having successfully completed the course and assessment.

What is Ciarb's policy on cancellation?

Ciarb reserves the right to cancel the course or change the tutors or the dates or the content of the programme. Candidates will be provided with adequate notice of any cancellation or changes. If Ciarb cancels the course, candidates will be provided with a full refund of any fees paid or the opportunity to transfer their registration to the next course, if available.

Should a candidate wish to cancel his or her confirmed registration of a course, notification must be received by email, prior to the start of the course, to info@ciarbcaribbean.org. Cancellation charges will apply.