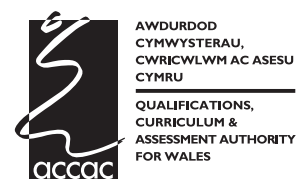


Arrangements for monitoring and reporting publicly on external qualifications



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Qualifications and Curriculum Authority
29 Bolton Street
London
W1Y 7PD

Contents

Introduction	2
1. Purposes and principles of monitoring and reporting publicly on external qualifications	3
Purposes of monitoring	3
Principles of monitoring	3
Principles of reporting publicly on the outcomes of monitoring	4
2. The regulatory authorities' arrangements for monitoring and reporting publicly	5
Overview of monitoring activities	5
Awarding body self-assessment	5
The regulatory authorities' programme of monitoring	7
Monitoring arrangements	7
Outcomes of monitoring	8
Reporting arrangements and the publication of information	8
Process for seeking reviews of regulatory authority decisions	9
Awarding bodies' action plans	10
Complaints and malpractice	10
Reviewing and improving the monitoring arrangements	11

Introduction

England, Wales and Northern Ireland share a common system of external qualifications. Statutory regulation of these qualifications is used to safeguard the public interest, ensure fairness for candidates and maintain public confidence.

Under the Education Act 1997 and the Education (Northern Ireland) Order 1998, responsibilities for regulating external qualifications lie with three regulatory authorities:

- the Qualifications and Curriculum Authority (QCA);
- Awdurdod Cymwysterau Cwricwlwm ac Asesu Cymru/the Qualifications, Curriculum and Assessment Authority for Wales (ACCAC);
- the Northern Ireland Council for the Curriculum, Examinations and Assessment (CCEA).

Further details of these responsibilities are set out in *A guide to the arrangements for the statutory regulation of external qualifications in England, Wales and Northern Ireland*, which is available on request from QCA, ACCAC or CCEA. It also sets out the regulatory requirements in the form of accreditation criteria, including a common code of practice.

One key responsibility is ‘to keep under review all aspects of such qualifications’. The three regulatory authorities have agreed the principles and procedures in this document as a common agenda for fulfilling this responsibility. It is primarily written for awarding bodies and gives an overall description of the regulatory authorities’ normal arrangements for monitoring and reporting publicly on the external qualifications in all three countries. The regulatory authorities will also provide more detailed information about the procedures summarised in this document. It should be noted that the arrangements given in this document do not apply to specific investigations into malpractice.

1. Purposes and principles of monitoring and reporting publicly on external qualifications

Purposes of monitoring

- 1.1 The purposes of the regulatory authorities' monitoring activities are to:
- a) ensure that the standards of achievement required for an award meet the regulatory requirements for quality, rigour, fairness and consistency within and across qualifications, across awarding bodies, and over time;
 - b) ensure that individual awarding bodies are delivering particular qualifications according to the accreditation criteria, including the common and qualification-specific codes of practice;
 - c) promote continuing improvement and public confidence in the quality of external qualifications;
 - d) keep under review the effectiveness of the accreditation criteria, in particular the codes of practice;
 - e) provide relevant information on the national qualifications system to a wide audience.

Principles of monitoring

- 1.2 Awarding bodies are responsible for the quality of the qualifications they award and must:
- a) comply with the requirements of the accreditation criteria, including the codes of practice, for qualifications accredited by the regulatory authorities;
 - b) systematically evaluate their delivery of accredited qualifications against the requirements of the criteria, including the codes of practice;
 - c) take prompt action to address any weaknesses identified.

These principles underpin awarding body self-assessment, described in section 3.

- 1.3 The regulatory authorities will:
- a) specify a programme of monitoring which gives sufficient coverage of qualifications to meet the purposes given in paragraph 1.1 above;
 - b) employ (or commission) and train individuals who have appropriate expertise to undertake monitoring work; these individuals will follow the procedures laid down by the regulatory authorities and adhere to a code of conduct;
 - c) make fair and objective judgements on whether:
 - awarding bodies' evaluations of their own performance are robust;
 - awarding bodies have in place quality assurance systems and quality control arrangements which meet the requirements of the accreditation criteria, including the codes of practice;
 - assessment and certification arrangements are consistent, rigorous and lead to awards at the appropriate standard of achievement;

- d) inform awarding bodies of the outcomes of monitoring activity which impact on their work and specify where action is required to address weaknesses against the criteria, including the codes of practice;
- e) have a process for an awarding body to seek a review where it considers that monitoring processes and procedures may not have been properly followed;
- f) use the outcomes of monitoring and subsequent action taken by awarding bodies to inform decisions on the reaccreditation of qualifications or, if necessary, the withdrawal of accreditation;
- g) publish a procedure for dealing with complaints from the public regarding accredited qualifications;
- h) ensure that their monitoring arrangements are clear, fair, rigorous, objective, efficient and effective by:
 - making information publicly available on the processes and procedures for monitoring;
 - reviewing and, where necessary, improving monitoring procedures;
 - reviewing and reporting publicly on their own performance;
- i) use the outcomes of monitoring to inform the development of the accreditation criteria, including the codes of practice.

Principles of reporting publicly on the outcomes of monitoring

- 1.4 The regulatory authorities will report publicly on the outcomes of monitoring work. Reports will be published in order to promote public confidence and continuous improvement in the qualifications system through openness and accountability.
- 1.5 When reporting publicly, the regulatory authorities will:
- a) inform awarding bodies of the broad intentions and arrangements for public reporting before specific monitoring activities begin;
 - b) ensure that reports:
 - are accurate, fair and objective;
 - give enough information to support the judgements made;
 - comment on good and poor practice;
 - are written in plain English and are well-presented;
 - c) support the maintenance of public confidence by:
 - ensuring that reports reflect the extent to which awarding body arrangements meet the criteria, including the codes of practice;
 - requiring awarding bodies to indicate publicly the action they intend to take in response to public reports on their qualifications;
 - publishing information on awarding bodies' compliance with their action plans;
 - d) make reports widely available.

2. The regulatory authorities' arrangements for monitoring and reporting publicly

Overview of monitoring activities

- 2.1 Statutory regulation is used to safeguard the public interest where other mechanisms, including awarding bodies' own quality assurance systems and quality control arrangements, would not be sufficient. Regulation, through accreditation and monitoring, is based on the accreditation criteria, including the common code of practice and qualification-specific codes of practice. These requirements are used in carrying out monitoring, drawing conclusions about aspects of an awarding body's work, and reporting. They also provide the basis for awarding body self-assessment reports.
- 2.2 Monitoring carried out by the regulatory authorities has three main strands:
- a) making judgements on the robustness of awarding bodies' self-assessment reports;
 - b) undertaking quality audits of awarding bodies' quality assurance systems and quality control arrangements for accredited qualifications;
 - c) reviewing the consistency and standards of achievement in particular subjects or sectors across centres, awarding bodies and/or over time.
- 2.3 The regulatory authorities use the outcomes of the above activities to draw conclusions on whether awarding bodies meet the requirements of the accreditation criteria, including the codes of practice. Awarding bodies are required to take action where non-compliance is identified.
- 2.4 Not all aspects of the criteria, including the codes of practice, will be addressed in every monitoring activity. Some awarding body systems are generic to a number of qualifications. Some are specific to particular qualifications or qualification types, particularly those relating to assessment. There is little value added in monitoring generic systems each time monitoring is carried out.

Awarding body self-assessment

- 2.5 The common code of practice requires an awarding body to have systematic arrangements for monitoring and reporting on all aspects of its own work. An awarding body should carry out self-assessment to demonstrate that it is regularly and effectively evaluating its quality assurance systems and quality control arrangements for accredited qualifications against the regulatory requirements. As part of the self-assessment process, an awarding body must develop an action plan to promote continuing improvement and address any weaknesses in its arrangements. This action plan should include any outstanding actions from regulatory authority monitoring.
- 2.6 The regulatory authorities expect the self-assessment process to be integrated into an awarding body's ongoing arrangements for monitoring and reporting on its work. An awarding body should therefore use existing reporting arrangements and reports where these are fit for purpose.

- 2.7 The robustness of an awarding body's self-assessment report is one of the factors taken into account when the regulatory authorities plan their monitoring programmes. Robust reports are likely to reduce the number of specific monitoring activities carried out by the regulatory authorities. Where an awarding body fails to supply a self-assessment report, or where the report is incomplete or insufficiently robust, the awarding body will be subject to more intensive monitoring activity. The eligibility of the awarding body's qualifications for future accreditation and reaccreditation will also be reconsidered should there be no improvement in the awarding body's ability to undertake self-assessment.
- 2.8 The start and end of the reporting period for the report will be agreed with the awarding body in advance and can be timed to reflect the awarding body's existing evaluation periods or business cycles. The awarding body's chief executive must submit the self-assessment report within three months of the end of the reporting period.
- 2.9 An awarding body's self-assessment report must focus on the extent to which its qualifications, practices and procedures meet the requirements of the criteria, including the codes of practice. Factual information in the report should generally be limited to that needed to support the evaluations made. However the awarding body should provide more detailed information where systems, documentation and/or responsibilities have changed since the last self-assessment report or submission for accreditation (as appropriate) to ensure that the regulatory authorities' records are up-to-date.
- 2.10 The regulatory authorities have not laid down a standard format for the self-assessment report since awarding bodies are encouraged to use their existing review and reporting arrangements. However, the report must be clearly linked to the criteria, including the codes of practice, and must:
- a) identify which qualifications and associated processes and procedures are being evaluated;
 - b) evaluate, with clear supporting evidence, the extent to which those processes and procedures have been followed correctly;
 - c) evaluate, with clear supporting evidence, the effectiveness of those systems and procedures in leading to valid awards;
 - d) provide a commentary on weaknesses;
 - e) list the actions, with target dates, that the awarding body is taking or will take to address weaknesses and improve performance.
- If there are any factors outside the awarding body's direct control which have affected its ability to meet the specified requirements, these should also be identified.
- 2.11 If the report evaluates generic systems that apply to all of the awarding body's qualifications, this should be clearly stated. Otherwise, the report should identify the specific types of qualification and sectors or subjects separately where differing requirements are in place.
- 2.12 The regulatory authorities will formally consider the validity of the awarding body's self-assessment report using information from their monitoring activities and, where appropriate, from the inspection agencies. In particular, the appropriateness of the action plan will be considered. If necessary, the regulatory authorities will seek additional information and/or clarification and may ask the awarding body to add further action points.
- 2.13 The regulatory authorities will monitor the implementation of the awarding body's action plan and review it with the awarding body on a regular basis.

- 2.14 Awarding body self-assessment reports will be held in confidence and will not be published by the regulatory authorities, or shared with other agencies, unless agreed with the awarding body.

The regulatory authorities' programmes of monitoring

- 2.15 The national qualifications framework contains qualifications offered by a large number of awarding bodies. The regulatory authorities will not regularly undertake detailed monitoring of all of these qualifications. Awarding bodies, using self-assessment, are however expected to regularly review their own qualifications.
- 2.16 The regulatory authorities will undertake specific monitoring activities that provide appropriate coverage across the qualifications framework. There will also be a need to monitor those areas where there is most concern, or where the impact of poor quality provision would be greatest. The nature, scope and frequency of the monitoring activity, will be determined by information on a number of factors:
- a) the robustness of the awarding body's self-assessment;
 - b) the extent of awarding body activity: numbers of qualifications offered, candidates registered and certificates awarded;
 - c) significant changes in levels of awarding body activity;
 - d) the need to ensure consistency and standards within and across qualifications;
 - e) the period of time since the last monitoring activity;
 - f) the awarding body's compliance with actions specified as a result of previous monitoring activity and through self-assessment;
 - g) the period of time until reaccreditation;
 - h) the number of substantiated complaints received from the public about an awarding body and/or a qualification;
 - i) the outcomes of compliance investigations into malpractice;
 - j) issues for monitoring raised at the point of accreditation;
 - k) concerns, based on relevant and objective information, raised by inspection bodies.

Monitoring arrangements

- 2.17 The following paragraphs give broad information about the way in which monitoring is carried out across a wide variety of qualification types and assessment models. The regulatory authorities will provide more detailed procedural information separately.
- 2.18 Prior to any monitoring activity, the regulatory authorities will inform an awarding body about:
- the scope and purpose of the activity;
 - the methodology being used;
 - the information the awarding body will be asked to provide during the activity;
 - the broad arrangements and intentions for public reporting of the outcomes of the monitoring activity, including the types of information to be included in the report and whether the awarding body will be identified;
 - the proposed timescales for the activity including publication.

An awarding body will have an opportunity to raise any concerns before the activity begins.

2.19 An awarding body's systems and procedures for ensuring the quality of its qualifications will be monitored using:

- a) desk research on the awarding body's systems and procedures to form an initial view on whether the procedures meet the regulatory requirements in principle;
- b) field work, in awarding bodies and centres, to confirm whether the systems and procedures are being followed and the extent to which they are effective in practice.

This type of work results in a report specific to an individual awarding body.

2.20 The consistency and validity of assessment will be monitored using:

- a) desk research to analyse written information about the qualification(s), identify the characteristics and requirements of assessment, and analyse any data about the outcomes of assessment;
- b) field work to obtain information on the quality and fitness for purpose of the assessment process and the consistency of assessment outcomes.

This type of report may result in a report referring to the work of one or a number of awarding bodies.

Outcomes of monitoring

2.21 The regulatory authorities will report to an awarding body on the outcomes of specific monitoring activities relating to its work. Such reports will identify the extent to which the awarding body meets the requirements of the accreditation criteria, including the codes of practice, and the action required to address non-compliance.

2.22 The level of compliance with the regulatory requirements will be indicated by the following quality descriptors. A quality descriptor will be given for areas of awarding body work looked at during the monitoring activity. These will also appear in any public report.

- a) This area of work fully meets the criteria, including the codes of practice.
- b) This area of work adequately meets the criteria, including the codes of practice, although minor improvements are required.
- c) This area of work requires action to meet the criteria, including the codes of practice, but without significant threats to the validity of award.
- d) This area of work does not meet the criteria, including the codes of practice; there are major shortcomings which must be rectified.

2.23 If the regulatory authorities identify serious concerns about an awarding body's work or a particular centre, they will require the awarding body to take action with immediate effect particularly where the validity of award is at risk.

Reporting arrangements and the publication of information

2.24 The regulatory authorities will publish monitoring reports such as:

- a) reports which are specific to individual awarding bodies and their arrangements for assessment and quality assurance and quality control;
- b) reports on particular assessment activities and qualifications over time and/or across awarding bodies;
- c) reports on particular themes, such as arrangements for candidates with particular assessment requirements or customer service;

d) summative reports on the outcomes of the monitoring programme.

The regulatory authorities will ensure that all published reports are written in plain English and are well-presented.

2.25 Each public report will include the following information:

- a) the intended purpose and target audience;
- b) the scope and nature of the monitoring;
- c) descriptions of the main findings sufficient to underpin the evaluations and conclusions in the report, including examples of good and poor practice;
- d) evaluations of compliance with the criteria, including the codes of practice, and conclusions using the quality descriptors;
- e) required action for the awarding body or bodies resulting from the findings.

The regulatory authorities will provide supporting technical information on the findings and evidence base to the relevant awarding body, but will not necessarily publish this.

2.26 Awarding bodies will be sent a written draft of any report in which they are named and asked to confirm the accuracy of relevant factual information before the report is finalised. Awarding bodies will normally be required to respond within three weeks of receiving the draft report although an extension may be given in exceptional circumstances.

2.27 Awarding bodies will be given at least five working days' notice of the date of publication together with a copy of the final report. Where the qualifications included within the report are available through the medium of Welsh, the report will be published simultaneously in English and Welsh.

2.28 Reports will be published on the regulatory authorities' websites. Hard copies will be available on request. Awarding bodies will be responsible for notifying their centres of the availability of relevant reports.

2.29 The regulatory authorities will ask awarding bodies to provide an immediate public response to the published report, giving information on the action they intend to take in response. This will usually be separate from, and less detailed than, the action plan which awarding bodies are required to agree with the regulatory authorities (see paragraph 2.33). The regulatory authorities will place this response with the report on the website if the awarding body agrees.

2.30 Published reports may result in queries or requests for more information from the public. The regulatory authorities will provide clarification on the content of reports but will not enter into discussions on the content. The awarding body will be sent copies of responses where appropriate.

Process for seeking reviews of regulatory authority decisions

2.31 An awarding body will have the right to seek a review where it considers that monitoring processes and procedures may not have been properly followed. The regulatory authorities will separately publish detailed procedures for review. Where an awarding body seeks a review about a monitoring activity which is leading to a published report, the report will not be published until the review process has been completed.

Awarding bodies' action plans

- 2.32 The regulatory authorities require awarding bodies to take action where they do not meet the criteria, including the codes of practice, or where there is clear risk of their not doing so. The more serious the non-compliance, indicated by the quality descriptor, the more rapidly an awarding body is expected to act. The regulatory authorities will indicate where immediate action is required.
- 2.33 Following receipt of the final report, the awarding body must provide a formal response stating the work it will undertake to meet each required action point, the timescale and named responsibilities. This action plan must be agreed with the regulatory authorities within three months of the awarding body receiving the final report.
- 2.34 The regulatory authorities will seek information from awarding bodies on the achievement of each required action point as the target date becomes due. The awarding body will receive formal notification that an action point has been achieved once the regulatory authorities are satisfied with the evidence provided. The regulatory authorities will also publish information about the achievement of action points.
- 2.35 If an awarding body has not undertaken the required actions, sanctions may be imposed on the awarding body to achieve rapid compliance. These sanctions are increased monitoring, a further published report, refusing accreditation and withdrawing accreditation. The severity of the sanctions imposed will relate to the extent to which the validity of certification continues to be affected.

Complaints and malpractice

- 2.36 The regulatory authorities have in place procedures for dealing with complaints about accredited qualifications from the public, such as those from candidates, centres, employers, schools, and teacher associations. This is separate from appeals against specific assessment decisions in GCSE, GCE A and AS level, Entry level and GNVQs which are dealt with by the Examinations Appeals Authority.
- 2.37 The regulatory authorities will normally only deal with complaints where:
- the complaint falls under the remit of the regulatory authorities;
 - the complainant has followed the relevant procedures of the centre and awarding body;
 - the complaint is submitted in writing.

In such cases, the regulatory authorities may investigate the complaint and discuss it with the awarding body. The regulatory authorities will seek to resolve substantiated complaints. Feedback will usually be given to the complainant on the outcomes of any investigation or a reason given on why the complaint is not being investigated. Complaints which fall outside the remit of the regulatory authorities may be passed to the relevant national agency.

- 2.38 In cases where the regulatory authorities suspect deliberate malpractice by centres or awarding bodies, identified either as a result of a specific monitoring activity or a complaint from the public, they may directly undertake an investigation or notify the appropriate authorities, such as the government's fraud liaison group or the police. The monitoring arrangements given in this document do not apply to such investigations.

Reviewing and improving the monitoring arrangements

- 2.39 The regulatory authorities will review their own procedures for, and performance in, carrying out monitoring in order to support continual improvement. As part of this work, feedback will be actively sought from those involved in monitoring or affected by the outcomes. The regulatory authorities will publish information on the evaluation of their own performance and actions taken as a result.
- 2.40 The regulatory authorities will use the outcomes of monitoring activities to inform revisions to the accreditation criteria, including the codes of practice.
- 2.41 To reduce the burdens on awarding bodies and centres, the regulatory authorities will develop mechanisms to share information with, or use information from, other organisations involved in monitoring the quality of training and assessment. Information on these mechanisms and the type of information being exchanged will be publicly available.

About this publication

Who's it for? Primarily for awarding bodies and of interest to those who have any dealings with external qualifications.

What's it about? It gives an overall description of the regulatory authorities' normal arrangements for monitoring and reporting publicly on external qualifications in England, Wales and Northern Ireland.

Related material A guide to the arrangements for the statutory regulation of external qualifications in England, Wales and Northern Ireland (QCA/00/589)

What's it for? The purpose of the document is to set out the principles and procedures agreed by the regulatory authorities for England, Wales and Northern Ireland.

For more information, contact:

Quality Audit Division, QCA, 29 Bolton Street, London W1Y 7PD, tel: 020 7509 5326

For more copies, contact:

QCA Publications, PO Box 99, Sudbury, Suffolk CO10 6SN

Tel: 01787 884444; fax: 01787 312950

QCA website: www.qca.org.uk

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