Review for Educational Oversight: Briefing note for QAA staff and reviewers

March 2012

Introduction

1   The purpose of the note is to provide information for staff and reviewers to use as part of their preparation for a Review for Educational Oversight (REO). This note has been informed by QAA staff and reviewers who have experience of working with applicants for educational oversight (providers) by the QAA. The Guidance has also been informed by discussions with Ofqual, the Federation of Awarding Bodies (FAB) and some awarding organisations.

2   The note reminds staff and reviewers of some key principles underpinning REOs and then sets out some general advice as well as specific advice for the key stages of QAA review processes.

Principles

3   All REO reviews should:

- be conducted in the context of QAA's mission, standards and values
- be carried out in such a way as to ensure, as much as possible, equivalence of review process and outcomes to reviews carried out in not for profit providers
- focus on the providers' responsibilities for academic standards, quality of learning opportunities and public information and so to safeguard UK higher education
- follow a published QAA review method.

General advice

4   Staff and reviewers should be careful that they do not make assumptions about providers. It would be helpful to note:

- the diversity of providers - for example, providers range from institutions with only a few higher education students to those with thousands
- approximately 25 per cent of providers are Listed Bodies as defined by the Department of Business, Innovation and Skills. ('An institution must offer a complete degree course, leading to a degree of a recognised body')
- A large number of providers work with awarding organisations. Applicants have listed the following awarding organisations on their application forms. (See Section below on Awarding Organisations)
- there are more monotechnics than typically found in the not for profit sector; these are providers which only offer higher education programmes in a single subject or a group of cognate subjects, for example, business and finance
- there is a heavy concentration of providers in London
- that a significant proportion of providers have few full-time staff; instead they rely on part-time staff, many of whom work for more than one provider. In such cases, it is not unusual to find that the few full-time staff are owners of the provider
- that not all providers are for profit, some are registered charities
- there may be a financial imperative for the providers to achieve HTS
- that providers have differing levels of familiarity with the terminology of the Academic Infrastructure (Quality Code). Some are fully conversant with the terminology, others work within the requirements of their awarding organisations, and so outside the framework of the Academic Infrastructure, and may not be familiar with terms such as the frameworks for higher education qualifications and *Code of practice*
- that providers are likely to be used to an external inspection model, rather than external peer review processes

- that it will be essential for all staff and reviewers to respect the commercial sensitivities of each provider and to be aware of competition for business between providers
- that many institutions have multiple entry/enrolment points each year
- student support may not be well established, except for English as a second language (ESOL).

Review preparation

5   As with all other QAA reviews, it will be important that each review is organised to respond to the context of each provider. There are a number of points to consider when arranging the review:

- because of the rapid pace of change in this sector, reviewers should be expected to read the provider's website thoroughly and to check the Ofqual and awarding organisation/bodies websites
- student representation may not be well developed. Students and staff may be less used to being asked to evaluate the quality of their education
- in many institutions, teaching staff may have little time to prepare for the review
- most providers have multiple enrolment points for new students; this may have a bearing on review scheduling and it will be important to recognise this when arranging meetings with staff and particularly with students during the review visit
- because of the dependence on part-time staff in some institutions, it may be difficult for some to identify a review facilitator and for this person to remain in that role throughout the review.

The review visit

6   During the review visit, teams will need to:

- be sensitive to the diversity of backgrounds of staff and students and to their spoken English language skills
- remember to correlate the evidence provided and the students' enrolment date and stage of programme
- arrange reviews and meetings which fit the attendance patterns of staff and students, and take into account the multiple roles of many staff
- bear in mind that in some providers, a number of the owner's family may be employees
- remember that the language of the Academic Infrastructure may be unfamiliar or unheard of to staff and students.

Review reporting

7   In addition to normal QAA reporting conventions, reviewers will need to pay particular attention to:

- setting out clearly the context of the provider and the arrangements for the assurance of academic standards and quality
- using the terminology of the provider and to explaining this where it differs from that found in not for profit providers
- ensuring that recommendations are SMART (specific, measurable achievable, realistic and time bound) and to recognising that in small institutions, most of the actions and their sign off may be the responsibility of the same person
- checking that business confidences are not disclosed
- ensuring that the report relates to the provider's responsibilities and not those of awarding bodies/organisations.

Awarding organisations - background information

Information for this section was provided by both Ofqual and the Federation of Awarding Bodies.

Introduction

This section of the briefing note is intended to provide background information for QAA Review teams about awarding organisations and the quality assurance that they apply in relation to qualifications delivered by providers (often termed 'centres'), which will be subject to Review for Educational Oversight (REO). This briefing does not attempt to provide comprehensive or detailed information about each individual qualification or set of qualifications, but ways in which this information can be obtained are included below.

There are some 180 awarding organisations currently recognised and regulated by Ofqual, the independent regulator of qualifications in England and vocational qualifications in Northern Ireland. Many are also recognised and regulated by the Scottish Qualifications Authority, the Welsh Government, and CCEA, for qualifications offered in Scotland, Wales, and Northern Ireland respectively. The approach to the regulation of awarding organisations is outlined below, as this sets out standard requirements of awarding organisations although does not define the ways in which these requirements should be met.

Awarding organisations are responsible to the qualification regulators and, in many cases, to other regulators with responsibility in their particular sector for the proper development, management, assessment and quality assurance of their qualifications. Unlike higher education institutions (awarding bodies), awarding organisations are not directly responsible for the actual delivery of the qualifications (the teaching and learning), although they will want to be assured that the provider has the capability and capacity to prepare the students for assessment.

Range of Awarding Organisations and Qualifications

Awarding organisations vary considerably in size, organisation and the qualifications that they offer. They can be large organisations such as City & Guilds, whose primary business is the provision and support of qualifications. They can be part of a larger organisation where their function is a small part of the overall, as is the case in most professional bodies. They may be a smaller organisation such as CACHE, dedicated to the provision of qualifications in a particular industrial sector(s), such as child-care or a more specialist area such as waste management.

The qualifications that they offer will also vary considerably from those designed to test occupational competence in a particular area of expertise, for example a specific aspect of pensions administration or a broader occupational area such as hospitality. They may be qualifications that allow entry to a particular profession, such as accountancy, or they may be broader qualifications in a general vocational area, such as BTEC Higher Nationals. Accordingly, the size, design, assessment and quality assurance of qualifications vary considerably.

Regulation of awarding organisations

This section sets out the requirements by Ofqual which are, in general, mirrored by SQA and the Welsh Government. Ofqual was created by the Apprenticeships, Skills, Children and Learning Act 2009. The provisions that relate to Ofqual commenced on 1 April 2010. Since then, Ofqual has been putting in place its regulatory framework.

Ofqual has recently revised its approach to regulation so that it recognises each awarding organisation and will, in time, move away from its current process of approving each qualification - known as regulated qualifications. Ofqual requirements relate to the organisation's processes and systems for developing qualifications, their relationships with providers, and the assessment and quality assurance of the qualifications. There are a number of awarding organisations that are not regulated by any of the UK qualification regulators and therefore are not subject to the same regulation and scrutiny in relation to their activities.

Recognised awarding organisations may also offer qualifications that are not regulated. These qualifications may be developed to meet the particular needs of an employer, for use in international markets or where there is limited or no benefit in being regulated such as higher level professional body qualifications which do not receive any public funding. These qualifications are usually developed by the awarding organisation but may be written with or by the provider and then approved by the awarding organisation. Normally, these non-regulated qualifications are then assessed and quality assured, in a similar way to the regulated qualifications offered by that awarding organisation.

On 18 May 2011, Ofqual published its General conditions of recognition http://www.ofqual.gov.uk/files/2011-05-16-general-conditions-of-recognition.pdf. These conditions came into effect on 18 July 2011. From that date, all awarding organisations were required to comply with the conditions. However, each awarding organisation has until 18 May 2012 to submit to Ofqual a statement from its governing body confirming compliance with the conditions - or highlighting where it is not compliant, supported by a plan to address the deficiencies.

Section C of the conditions is particularly relevant to the educational oversight reviews. This section addresses arrangements with third parties, including centres. The main aim of the conditions in Section C is to require an awarding organisation to work with a centre in a way that enables the awarding organisation to fulfil the remainder of the conditions - including the many conditions that are concerned with the security of academic standards.

The Ofqual recognition requirements cover:

- *Governance* - including the management of risk and malpractice/maladministration
- *The relationship with Ofqual* - the need for compliance with regulation, communications
- *Third parties* - the management of third parties including contractors such as examiners
- *The qualifications* - the need for them to fit for purpose, their accessibility, complaints
- *Design and development of qualifications* - the need for support, fit for purpose assessment
- *Provision of qualifications* - information about fees, clarity of invoicing
- *Setting and delivering assessment* - need for confidentiality, reasonable adjustments and special consideration

- *Marking and issuing results* - marking and moderation, results determination and issuing
- *Appeals and certificates* - the need for an appeals process and rules around certificates.

Awarding organisations are reviewing and, if necessary, revising their systems to meet the detailed Ofqual requirements, meaning that there is currently a degree of movement in the awarding organisation processes and systems. Ofqual is developing a risk based approach to the regulation, which includes the monitoring of awarding organisations through visits and other activity such as the regular review of data held by Ofqual about the awarding organisation.

Prior to a review, QAA should have received details of the qualifications currently being offered by the provider (see below). It will then be possible for reviewers to obtain the current information about the awarding organisations in question and each of their qualifications from the Ofqual Register. It is possible to search the Register for details on awarding organisations using a minimal amount of information, such as an acronym. This will bring up details about the awarding organisation including a link to their website.

The Register also contains details of all regulated qualifications and again a search using minimal information will allow access to the specific target qualification. The Register includes details about the size, structure, purpose and assessment method of each qualification.

Awarding organisation quality assurance

The awarding organisation will review external assessments that they conduct and/or the quality assurance reports submitted by their external verifiers or moderators across all providers and all qualifications. From these they may identify issues that relate to the performance of the provider and that need further investigation; for example a low pass rate in an examination may indicate that the provider staff have not understood the requirements of a new qualification or a poor pass rate on an internally assessed and externally verified qualification may indicate a weakness in staff or physical resources. The awarding organisation will then decide what further action they need to take, either internally or with the provider.

In general awarding organisations' quality assurance processes will encompass:

The development of the qualification: Regulated awarding organisations are required to have clear processes in place that establish the need for each qualification, consultation with employers, HE, teachers and other relevant parties that would have an interest in the qualification under development. The qualification has to be designed and written within the detailed regulation set out by the regulators (principally Ofqual), in particular in relation to the Qualifications and Credit Framework (QCF), where this is relevant. Currently, each regulated qualification has to be submitted to the appropriate regulator for each country where the qualification will be offered. In the vast majority of cases, this will be to Ofqual for recognition in England and, once approved by them, the qualification will be listed on the Register.

The approval of the provider to offer the awarding organisation's qualification:
Although some awarding organisations have a direct relationship with their students, the norm is for the awarding organisation to have a relationship with the provider institution (known as the centre). Each centre needs the approval of the awarding organisation before it can offer one of their qualifications. In most cases this takes the form of a provider approval where the fitness of the institution as a whole is considered including areas such as the

management systems, internal quality assurance/control processes, and the support offered to students including the need for an appeals process. The arrangements between the awarding organisation and the provider will vary across the industry but now have to meet defined requirements set out in the Ofqual Conditions.

This is then supplemented by qualification approval where the provider has to demonstrate that they have sufficient and appropriate resources, both staff and physical, to properly prepare the students for assessment and, where the qualification is internally assessed, to carry out and internally quality assure assessment of the students to the standards required for each qualification. This qualification approval does not relate to the teaching and learning associated with the qualification and it is not necessarily a requirement of the awarding organisation that staff have a teaching qualification; rather the particular subject, professional and/or industrial experience of staff is critical.

Providers may obtain approval from an awarding organisation to offer a qualification(s) but may then not actually run the qualification(s). This may be for a number of years, indeed ever, or the providers may offer the qualification every other year or more infrequently. This will be for a number of reasons, including failure to recruit students or the inability to recruit suitably qualified staff. The awarding organisation will not know whether or not the provider is running a particular qualification each year until they register students with the awarding organisation, often by a published deadline. As registration is usually associated with the payment of fees to the awarding organisation, there is limited benefit for the provider in registering students early.

Student assessment: In a number of cases, including many of the professional bodies, the assessment of the qualification is by externally set and externally marked examinations. These examinations are written and quality assured by the awarding organisation, using experts within the field who may be contracted specifically for this purpose. Similarly, the examination papers are marked by specially contracted examiners and quality assured by senior examiners and/or awarding organisation staff through normal sampling procedures.

Many vocational qualifications are internally assessed with students doing assignments/projects in the centre, which are assessed by the providers' staff. These assignments may be set by the awarding organisation or the staff and in some cases are done under controlled conditions. Such internal assessments have to be sampled by an external subject specialist appointed by the awarding organisation - known as the moderator or external verifier - before those assessment decisions are confirmed and can contribute to the eventual award of the qualification to the students by the awarding organisation. Some qualifications may have both internal assessments and examinations

QAA's relationship with Ofqual

QAA is currently establishing an information exchange protocol with Ofqual. If, in the course of reviews, evidence is uncovered which suggests that practice is not in line with the General conditions of recognition, QAA will refer this to Ofqual

It is important to remember that the awarding organisations themselves are not the subject of educational oversight reviews, but if practice within a provider is found to indicate the standards of an awarding organisation's awards are not secure, QAA will alert both the awarding organisation and Ofqual to these concerns

List of awarding organisations involved in educational oversight:

AQA

Website: www.aqa.org.uk

Member of Federation of Awarding Bodies (FAB)? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5241)

Architects Registration Board

Website: www.arb.org.uk

Member of FAB? No

Ofqual register? No

Architectural Association School of Architecture

Website: www.aaschool.ac.uk

Member of FAB? No

Ofqual register? No

Ascentis

Website: www.ascentis.co.uk

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5200)

Association of Accounting Technicians (AAT)

Website: www.aat.org.uk

Member of Federation of Awarding Bodies (FAB)? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5220)

Association of British Language Schools

Website: www.abls.co.uk

Member of FAB? No

Ofqual register? No

Association of Business Executives (ABE)

Website: www.abeuk.com

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5221)

Association of Business Practitioners (ABP)

Website: www.abp.org.uk

Member of FAB? No

Ofqual register? No

Association of Chartered Certified Accountants (ACCA)

Website: www.acca.co.uk

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5113)

Association of Computer Professionals (ACP)

Website: www.acpexamboard.com/index.html

Member of FAB? No

Ofqual register? No

Association Information Security Auditors and Business Executives (AISABE)

Website: www.aisabe.org.uk

Member of FAB? No

Ofqual register? No

Association of Taxation Technicians

Website: www.att.org.uk

Member of FAB? No

Ofqual register? No

Association for Tourism and Hospitality Executives (ATHE)

Website: www.atheuk.com

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5344)

BCS, The Chartered Institute for IT

Website: www.bcs.org

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5188)

Buttercups Training

Website:
www.buttercups.co.uk/website/website.nsf/lookupcontent/index.html!opendocument

Member of FAB? No

Ofqual register? No

CAM Foundation

Website: www.camfoundation.com

Member of FAB? No

Ofqual register? No

Cambridge (ESOL)

Website: www.cambridgeesol.org/index.html

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5185)

CFA Society of the UK

Website: www.cfauk.org/index.html

Member of FAB? No

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5319)

Chartered Institute of Environmental Health

Website: www.cieh.org

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5248)

Chartered Institute of Management Accountants (CIMA)

Website: www.cimaglobal.com

Member of FAB? No

Ofqual register? No

Chartered Institute of Marketing (CIM)

Website: www.cim.co.uk/home.aspx

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5127)

Chartered Institute of Public Finance and Accounting

Website: www.cipfa.org.uk

Member of FAB? No

Ofqual register? No

Chartered Institute of Taxation

Website: www.tax.org.uk

Member of FAB? No

Ofqual register? No

Chartered Management Institute (CMI)

Website: www.managers.org.uk

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5128)

City & Guilds

Website: www.cityandguilds.com/uk-home.html

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5217)

Confederation of Tourism and Hospitality (CTH)

Website: www.cthawards.com

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5131)

Council for Awards in Care, Health and Education (CACHE)

Website: www.cache.org.uk/CacheDnn/Default.aspx

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5121)

Counselling and Psychotherapy Central Awarding Body (CPCAB)

Website: www.cpcab.co.uk

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5231)

Education for Business Managers and Administrators (EBMA)

Website: www.ebma.org.uk

Member of FAB? No

Ofqual register? No

Education Development International plc (EDI)

Website: www.ediplc.com

Member of FAB? Yes (full member)

Ofqual register? Yes (hregister.ofqual.gov.uk/Organisation/Details/RN5134)

Institute of Administrative Management (IAM)

Website: www.instam.org

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5139)

Institute of Chartered Accountants in England and Wales (ICAEW)

Website: www.icaew.com/en

Member of FAB? No

Ofqual register? No

Institute of Chartered Secretaries and Administrators (ICSA)

Website: www.icsa.org.uk/home?c=1

Member of FAB? No

Ofqual register? No

Institute of Commercial Management (IOCM)

Website: www.icm.ac.uk

Member of FAB? No

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5258)

Institute of Credit Management (ICM)

Website: www.icm.org.uk

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5264)

Institute of Financial Accountants

Website: www.ifa.org.uk/home

Member of FAB? Yes (Associate Member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5331)

Institute of Leadership & Management (ILM)

Website: www.i-l-m.com

Member of Federation of Awarding Bodies (FAB)? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5143)

Institute of Legal Executives (ILEX)

Website: www.ilex.org.uk

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5142)

Institute for the Management of Information Systems (IMIS)

Website: www.imis.org.uk

Member of FAB? No

Ofqual register? No

ITEC

Website: www.itecworld.co.uk/uk_qualifications/index.htm

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5149)

London Centre of Marketing (LCM)

Website: www.lcmuk.com

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5210)

National Association of Licensed Paralegals (NALP)

Website: www.nalp.org

Member of FAB? No

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5154)

NCFE

Website: www.ncfe.org.uk

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5156)

National Examining Board for Dental Nurses (NEBDN)

Website: www.nebdn.org

Member of FAB? No

Ofqual register? No

National Open College Network (NOCN)

Website: www.nocn.org.uk/Homepage

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5194)

NCC Education

Website: www.nccedu.com

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5155)

Oxford, Cambridge and RSA Examinations (OCR)

Website: www.ocr.org.uk

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5193)

Organisation for Tourism and Hospitality Management (OTHM)

Website: www.othm.org.uk

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5284)

Pearson Education Ltd

Website: www.edexcel.com

Member of FAB? Yes (full member) - listed as Edexcel (Pearson Education Ltd)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5133)

Royal Institute of British Architects (RIBA)

Website: www.architecture.com

Member of FAB? No

Ofqual register? No

Scottish Qualifications Authority (SQA)

Website: www.sqa.org.uk

Member of FAB? Yes (full member)

Ofqual register? Yes (register.ofqual.gov.uk/Organisation/Details/RN5167)

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