Post-Recognition Monitoring Report

Ascentis

September 2010

Ofqual/11/4813

Contents

Introduction

Regulating qualifications

The responsibility for regulating qualifications lies jointly with three regulators:

- Office of Qualifications and Examinations Regulation (Ofqual), the regulator for qualifications awarded in England and vocational qualifications awarded in Northern Ireland

- Department for Children, Education, Lifelong Learning and Skills (DCELLS), the regulator for Wales

- Council for the Curriculum, Examinations and Assessment (CCEA), the regulator responsible for qualifications (other than vocational qualifications) awarded in Northern Ireland.

We systematically monitor awarding organisations and their regulated qualifications against the requirements set out in the statutory regulations. The aim of this activity is to promote continuing improvement and public confidence in the quality of regulated qualifications.

Where an awarding organisation is found not to comply with relevant criteria, the regulators will identify areas of non-compliance that must be rectified within a certain period. Even if an awarding organisation is compliant, the monitoring team may provide observations on ways in which the awarding organisation could change its systems and procedures to improve clarity or reduce bureaucracy.

Instances of non-compliance and observations arising from this monitoring activity are specified at the end of each section of this report. Awarding organisations are required to produce an action plan to show how they will deal with any non-compliance issues identified. We will generally agree the action plan and monitor its implementation.

We will use the outcomes of monitoring and any subsequent action taken by awarding organisations to inform decisions on future monitoring and/or the possible imposition of sanctions.

Banked documents

As part of the awarding organisation recognition process, the regulators require awarding organisations to submit certain documents to Ofqual, to be held centrally. Information from these 'banked' documents is used to inform monitoring activities and may also affect an awarding organisation's risk rating.

A suite of documents has been identified as suitable for banking, consisting of those items considered to be the most crucial in supporting an awarding organisation's ability to operate effectively. To maintain the currency of the banked documents, awarding organisations are responsible for updating them as and when changes occur. They are also reminded to review them at least annually as part of the self-assessment return.

About this report

This report is the outcome of a monitoring activity on Ascentis awarding organisation that was carried out by Ofqual staff between August and September 2010. It draws together the regulators' findings on areas of:

- management and governance

- resources and expertise

- diversity and equality

- development of units and rules of combination (RoC) for qualifications

- design and development of assessment

- delivery of assessment

- centre recognition

- awarding and certification.

This is the first post-recognition monitoring activity on Ascentis in respect of the Qualifications and Credit Framework (QCF) since the awarding organisation received supplementary recognition in February 2010.

The monitoring activities included desk research of information already held by us, examination of Ascentis' recognition application and scrutiny of the awarding organisation's website. Our monitoring team visited Ascentis' head office to conduct interviews with staff and review documentation. Centres were also visited.

This report draws together the regulators' findings from these monitoring activities.

About Ascentis

Ascentis evolved from the Open College of the North West (OCNW). This unincorporated association consisted of Lancaster University and others and was formed in 1975, becoming a recognised awarding body from 2001. In 2009, for practical reasons, Ascentis was incorporated as a company limited by guarantee and in July 2009, after recognition by the charities commissioners, all assets and liabilities were transferred from OCNW into the limited company. For more information on Ascentis, visit its website at www.ascentis.co.uk.

Management and governance

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008), paragraphs 2.1–2.3, 5.1 and 5.17.

Findings

1. Ascentis is a company limited by guarantee and a registered charity. At the time of monitoring, the company had just completed its first year's trading as a corporate entity. It had been known previously as the awarding body OCNW, an unincorporated association. Ascentis had kept us fully informed of the changes in its corporate identity.

2. The company is governed by a board of trustees. An executive team has control of day-to-day activities and reports to the board. The chief executive is the single named point of accountability for all the regulated functions that Ascentis performs. All decision making vests in the executive, not the subsidiary committees.

3. Reporting to the executive, there is a development and quality committee that monitors the quality assurance of all Ascentis' qualifications except the Quality Assurance Agency (QAA) recognised *Access to Higher Education,* for which there are separate arrangements. There is separation of control of regulated and unregulated qualifications within the committee.

4. Ascentis provided us with an organisation chart of jobs and job-holders as well as a chart of its committee structures. We examined the committees' terms of reference and minutes, and were satisfied with their content.

5. There is no joint awarding activity. Ascentis has participated in unit development activity for the QCF, coordinated by sector skills councils (SSCs). However, Ascentis did not consider that this activity contributed to any of its regulated functions.

6. We did not find any evidence of potential conflicts of interest.

7. Ascentis provided us, in confidence, with details of its policy on fees. We were satisfied with the information provided.

Non-compliance

There are no instances of non-compliance in relation to this section.

Observations

There are no observations in relation to this section.

Resources and expertise

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008), paragraphs 2.4–2.6, 3.1, 4.1 and 5.2.

Findings

1. We did not look at the financial resources of Ascentis as it was too soon for audited accounts to be available for this newly operational company.

2. Overall, we were satisfied that Ascentis had sufficient staff to manage the very wide range of qualifications it offers. Ascentis staff said that they would not take on a sector or qualification if they did not have the resource.

3. There is a disaster recovery plan for the business, but no formal testing has taken place yet. However, in effect, the adequacy of systems has been tested twice: firstly, when Ascentis disengaged from Lancaster University as it emerged from OCNW; and then, secondly, when Ascentis relocated within Lancaster.

4. We expressed surprise that the IT expertise was relatively concentrated in one person's hands. Some routine back-up to the IT manager is available from others in-house in case of need. Ascentis said that this matter was under active consideration.

5. Ascentis argued, however, that there is significant back-up to the IT manager provided by an independent management consultancy. The consultancy provides and maintains Ascentis' database as well as working with Ascentis on a number of issues, such as those relating to the Diploma Aggregation Service (DAS) and candidates' Personal Learning Records (PLRs). The IT manager liaises extensively with the consultancy and three meetings per year take place between Ascentis' deputy chief executive and the consultancy's managing director, which the IT manager attends.

6. We discussed the procedures Ascentis had adopted to ensure that its staff and associates had the necessary expertise in the design and development of units and RoC for the QCF and in assessment. Evidence was provided in terms of CVs of selected staff against job roles and person specifications.

7. There was also information on the training that had been provided in-house as well as the external training taken up, for example unit writing and RoC creation workshops at the Federation of Awarding Bodies. Internal courses to cascade information have also taken place. A unit-writing guide has been produced for use in training new members of staff.

8. As an existing awarding organisation, Ascentis could evidence sector and subject expertise. It could also evidence assessment and awarding expertise. Ascentis made the point that its past experience ensured that a holistic approach was taken to unit creation. Unit writers consider how credit will be awarded and how the unit will be assessed when designing a unit. All unit outcomes are assessed and each outcome is capable of being assessed independently of the others.

9. Assessment is mainly portfolio based, internally assessed by centres and externally moderated. In addition, for construction qualifications, there is a practically based task set by Ascentis, assessed in centres and externally moderated.

10. Ascentis' recruitment procedures were examined and discussed. Both the development manager and the quality assurance manager are involved in this since Ascentis relies upon its associates and external moderators for the quality of its units and qualifications.

11. Assessment experience and curriculum knowledge are required, although further training is provided once recruited. Typically, for any unit created, there will be one person with thorough curriculum knowledge and another with good assessment skills working on the project. For RoC, Ascentis has some experience because of its participation in the QCF Tests and Trials. New recruits are given tasks to test their understanding and further training is provided.

12. There is an induction process, which includes a session with the appropriate line manager, focusing on the job specification. Identification of training and staff development needs is part of the induction process from the first day. The initial induction is supported by a one-month, three-month and six-month review. At the end of a year, a self-appraisal is requested for a review meeting where annual appraisal occurs. Any support required will be identified at that meeting as a training need. In addition, external moderators will have the benefit of feedback from their centres. External moderators report to the quality assurance manager.

13. Ascentis has procedures for unit writing, RoC and assessment (procedure for the design, development, review and signing off of QCF units of assessment; procedure for the design, development and review of RoC of a qualification). These procedures evidenced that a review of the procedures by the director of qualifications was built into the process.

14. We were satisfied that Ascentis had the skills and expertise required to operate within the QCF in terms of product development. We were satisfied that Ascentis was making provision for skilled staff and/or associates to support

current and future demands for its services, and that their skills were being applied appropriately.

Non-compliance

There are no instances of non-compliance in relation to this section.

Observations

1. Ascentis should consider whether its IT activities need more formal in-house support, than that which can be provided by just one individual.

Diversity and equality

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008), paragraphs 2.11–2.14.

Findings

1. Discussion with Ascentis staff and the review of various documents showed that Ascentis is committed to ensuring equality for all learners and to minimising barriers to entry to its units and qualifications. The development and quality committee (National Qualifications), on behalf of the strategic management team, ensures compliance with the organisation's diversity and equality policy.

2. Ascentis guarantees equality for all learners by making sure that centres have an up-to-date equal opportunities policy in place, the implementation of which is monitored by both internal and external moderators as part of the quality assurance system.

3. The deputy chief executive is the person responsible for ensuring Ascentis' compliance with the requirements of equalities legislation. Ascentis has also employed an HR advisor to advise on the legal implications of changes in legislation. This is an ongoing process.

4. Diversity and equality is taken into consideration in all aspects of the unit and RoC development, as well as in the assessment process. During unit development this process is reviewed by an approval panel, made up of sector experts, to ensure that all necessary procedures, including those related to diversity and equality, are followed.

5. Ascentis provides its qualifications development team with diversity and equality training. The training takes the form of discussion, looking at units and methods of assessment in order to foresee possible barriers to entry. One example provided by Ascentis was that of a qualification where, due to the nature of the units, various barriers to entry were foreseen. These barriers were mitigated through the assignment of only two mandatory units to the qualification, with numerous optional units to allow wider accessibility.

6. If barriers to entry are identified their nature is stated when the units are submitted to our register of qualifications.

7. Diversity and equality are also embedded within the delivery of assessment. In many disciplines (for example, construction and horticulture) Ascentis has moved from external assessment to portfolio assessment as a more suitable method of evaluating learning, in order to eliminate barriers.

8. Ascentis consults with learner representatives, who are usually tutors/practitioners, to make sure that there are no barriers to entry to particular units and qualifications. Sometimes these learner representatives are involved in the development process. There is no process for consulting directly with learners.

9. Ascentis has a thorough reasonable adjustments policy that is available on its website. Centres have some flexibility in making their own reasonable adjustments and this flexibility is defined by Ascentis. In other cases they must apply for central Ascentis approval. Decisions are made by the operations manager or the quality assurance manager, monitored by the development and quality committee. All reasonable adjustments must be recorded by the centre and are checked by the external moderator.

10. While Ascentis collects some data, it is questionable whether or not it has adequate procedures in place to collect sufficient data to allow it to effectively monitor and evaluate its compliance with sections 2.11 to 2.13 of the QCF regulatory arrangements. Moreover, there is no formal review of the data unless queries arise. There is no requirement to create a report to any committee, for example.

Non-compliance

There are no instances of non-compliance in relation to this section.

Observations

2. Ascentis should review how it collects sufficient data to allow it to monitor and evaluate its compliance with paragraphs 2.11 to 2.13 of the QCF regulatory arrangements.

Development of units and RoC for qualifications

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008), paragraphs 3.2–3.3 and 4.2–4.4.

Findings

1. Ascentis has procedures that are followed for the development of units and RoC. However, these do not fully document the process that is followed in practice.

2. Units of assessment are developed as the need is identified during the development of RoC. Ascentis is able to develop units as part of qualification development or to develop units separately. A brief for a qualification is produced with the details of units to be developed.

3. A working group, led by the subject development manager with support from the subject moderator is set up to develop units. Centre and other subject experts are invited to join this group. The QCF database is interrogated for similar units. Feedback from the delivery of similar units at centres is taken into account in producing QCF units. The units are sent to centres for feedback. The resulting feedback is used by the development manager and moderator to revise the units. Diversity and inclusion barriers are identified and units are revised to reduce or eliminate the barriers.

4. The level and credit of a unit is considered at the beginning of the development process. Both are discussed with the SSC in the early dialogue for the development of the qualification. Where possible, the level of units is kept as close as possible to that of existing NQF units in order to meet centre needs. The level of a unit is reviewed by the director of qualifications.

5. The volume of learning is considered by subject experts during the development of qualifications. The credit for units is compared with that of other similar units within the QCF databank.

6. Ascentis refers to the credit for the qualification. The concept of credit in units of assessment does not seem to be well understood. There needs to be a clear procedure that documents how credit will be assigned to units developed by Ascentis. The procedure needs to cover the way that Ascentis determines the credit, who will be involved, how this will take place and what will be taken into account. The procedure also needs to determine the learning time for the unit, for the average learner, to meet the learning outcomes to the standard determined by the assessment criteria.

7. The completed units are sent to centres by email for review and comment before being signed off by the director of qualifications. The approval panel will check that due process has been followed.

8. A decision to develop new qualifications can be reached after SSC meetings where new qualifications can be identified based on the sector qualification strategy.

9. The rationale for the RoC is informed by the business case for the qualification. The business case is agreed by the executive to ensure that it fits in with existing qualifications on offer. A brief is produced for the qualification to be developed by the development manager.

10. When a QCF qualification that is based on a non-recognised qualification is developed, a RoC will be required. In the case of horticulture, a non-accredited qualification has been designed to be offered in the QCF. A working group is set up, involving existing Ascentis centres and potential agriculture centres that may be interested in the qualification. This working group can involve a small number of centres, the Ascentis development manager and moderator in this subject area. The RoC is developed at a development group meeting and is informed by subject experts' views of suitable mandatory and optional units to include in the RoC.

11. The QCF database in the National Database of Accredited Qualifications is interrogated to find suitable units for the RoC. This results in a RoC being developed of units from a variety of unit developers. Ascentis is able to compare units between different submitters and with the provision already offered.

12. The process of developing RoC produces meaningful and coherent combinations of units that identify barred combinations of units. This takes place through informal discussions with the development manager and the director of qualifications.

13. Ascentis is aware of the flexibility of the RoC in the QCF regulatory arrangements, section 1, and uses the rules appropriately for the RoC that have been developed. Centres that identify equivalencies and exemptions are required to contact Ascentis. The qualification lead development manager will make a decision about their requests. The SSC is informed of the equivalencies and exemptions that are identified for RoC. Ascentis uses this to inform its own review of RoC.

14. The RoC is emailed to centres that express an interest in attending the working group for feedback. Responses are used to refine the RoC before it is reviewed internally by the development manager and the director of qualifications.

15.   The RoC is sent to the relevant SSC for 'approval of' the qualification in respect of the Sector Qualification Strategy.

16.   The RoC is finally signed off at the approval panel meeting before being submitted to Ofqual via the web. The notes of the approval panel are detailed and provide evidence of the RoC being carefully considered.

17.   All qualifications are reviewed six months before the qualification review date. Feedback from the use of RoC is captured from the deliverers of qualifications, stored on the qualification database and used in the review. The review is an informal discussion between the director of qualifications and the subject development manager on whether there is a continued need for the RoC or if there are any changes required. The construction qualification, for example, identified that there was a need for stonemasonry units. If there are no changes this is recorded on WBA. If changes are required this will go to the approval panel before going out to the centres for consultation to go through the RoC development process.

Non-compliance

1.   Ascentis must clarify the procedure for the determination of level and credit. Credit needs to be determined for units of assessment by taking into account the learning time required to complete the learning outcomes to the standard determined by the assessment criteria.

   Regulatory Arrangements for the Qualifications and Credit Framework (2008), paragraph 1.7b)

Observations

3.   Ascentis should consider documenting more fully the procedure for the development of units of assessment and RoC that can be used by Ascentis staff and its associates.

Design and development of assessment

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008), paragraphs 5.3 and 5.16a.

Findings

1. The method of assessment is considered at an early stage, when the business case is developed. A range of assessment methods is available for use.

2. The SSC assessment requirements for qualifications are taken into account in the design of the assessment.

3. Ascentis designs and develops assessment for qualifications. This function is also delegated to centres. Where centres design their own assessment the assessment is submitted to Ascentis for approval.

4. Assessments are designed by the subject development manager, and this is followed by a consultation with the subject moderators and centres. The method of assessment most commonly used is portfolio-based and this is supported by the rationale for the units and qualification. The assessments are reviewed following feedback. The horticulture qualification uses portfolio-based assessment as this best supports the learners, but the construction qualification, for example, uses both portfolio-based assessment and an externally set, internally marked assessment.

5. The controlled assessment for construction is developed by the subject expert moderator and subject experts. Sign off is given by the quality assurance manager.

Non-compliance

There are no instances of non-compliance in relation to this section.

Observations

4. Ascentis should consider clarifying the procedure for the design and development of assessments for those it produces itself and for centre-devised assessments.

5. Ascentis should consider separating its procedure for the design and development of assessment and its guidance to centres.

Delivery of assessment

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008), paragraphs 5.5–5.6, 5.9–5.10 and 5.16b.

Findings

1. Responsibility for the delivery of assessment is delegated to centres.

2. Centre assessors use the Ascentis-devised external assessment or the centre-devised assessment. Assessment is internally moderated by subject expert moderators and externally moderated by Ascentis subject-specific external associate moderators. The assessors and internal moderators are confirmed at centre recognition. The qualification specification outlines the roles and responsibilities for the delivery of assessment for the qualification.

3. Assessors use a tracking sheet to record assessment decisions and to confirm the authenticity of learners' evidence.

4. Assessments are internally moderated and standardised by centre staff. Records of centre standardisation meetings are used during external moderation and recorded in the external moderator's report.

5. The expertise of centre staff is confirmed during centre recognition and the external moderator monitors the staff in the assessment of the qualification at centre visits. The results of ongoing centre performance systems are fed into the internal moderator process and into the external moderator process and report.

6. There is a clear process for the retention of sufficient amounts of learners' work to enable the monitoring of assessment decisions over time. Centres are required to keep internally moderated work for four weeks after it has been moderated by the external moderator. Ascentis keeps a sample of learners' externally moderated work at its head office.

7. Centres have delegated responsibility for recognition of prior learning.

8. There is a working procedure for claims for exemptions. Centres contact Ascentis when they have identified a claim for exemption. The development manager for the qualification takes the lead in making the decision on the request. There are plans to use the records of exemption to inform future development of RoC.

9.   Ascentis has a sound procedure for identifying external moderators' conflicts of interest. Internal moderators identify conflicts of interest in centres, but the procedure for this is less well developed.

10.   The standardisation of assessment outcomes across centres and awards is carried out at annual standardisation events. The external moderator will ensure that centres that are unable to attend are updated on standardisation developments.

11.   Subject team reviews are produced annually based on moderator reports. The subject team reviews are reported to the qualification and development committee. This feeds into the annual report and self evaluation.

Non-compliance

There are no instances of non-compliance in relation to this section.

Observations

6.   Ascentis should consider providing guidance to centre staff on the identification and management of conflicts of interest.

Centre recognition

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008), paragraph 5.11.

Findings

1. At the time of monitoring, the central learner record had not yet been established so there were a number of aspects of centre recognition that neither Ascentis nor the regulators could evaluate.

2. Ascentis has procedures in place to approve and monitor centres. We looked at the centre approval document. It clearly establishes that a centre has a single named point of accountability for the quality assurance and management for the assessment of units and qualifications.

3. The application form addresses whether the centre has the staff and other resources to support the assessment of Ascentis' units. It also covers the question of recognition of prior learning.

4. Much of the information relevant to the criteria for centre recognition is obtained by asking the centre to confirm statements in line with the QCF regulatory arrangements. We were not sure how Ascentis' quality assurance manager decided when to visit centres to check the details stated on the application before approval.

5. It was also not clear how Ascentis knew that centres were able to hold and transmit securely details of assessment outcomes relevant to the QCF. The question of whether a centre was in a partnership arrangement was not asked until approval to award qualifications was requested.

6. The centre approval form requires centres to agree to provide access for both the awarding organisation and us to the centres premises, records and staff. The form's wording was not identical to the wording in the QCF regulatory arrangements and Ascentis should review whether its wording would oblige a centre to act as intended.

7. We were satisfied that, through its external moderators' visits, Ascentis keeps control of its centres compliance with the QCF regulatory arrangements. Visits made by us to centres showed that centres equally relied upon their external moderator for guidance. Centres said that it was often difficult to book external moderators' time.

Non-compliance

There are no instances of non-compliance in relation to this section.

Observations

7. Ascentis should clarify in its procedures:

    • when it will not be necessary to visit a centre at the approval stage

    • how it knows if centres are able to hold and transmit securely details of assessment outcomes relevant to the QCF

    • how it ascertains whether a centre is a partnership arrangement between organisations.

8. Ascentis should review whether its wording on the centre recognition application form regarding access for itself and us would oblige a centre to act as intended.

9. Ascentis should consider increasing the external moderator resource, given its importance to both itself and centres, to make it easier for centres to book an external moderator visit.

Awarding and certification

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008), paragraphs 5.12–5.15 and 5.16c–d.

Findings

1. Ascentis checks the accuracy of learner assessment information from centres by means of its team of external moderators. All assessment results have to be signed off and submitted by them in order for credit to be awarded to learners. Moderators' visits are monitored by line management to ensure that they are fit for purpose.

2. Any errors discovered will lead to results being adjusted. These procedures ensure that credit is awarded securely and accurately. As centres are only visited twice a year, it is debatable, however, whether credit is awarded quickly, although the time-scales are in accord with conventional twice-yearly examinations.

3. Centres cannot evidence how they will access the learner record until a central system, external to Ascentis, for recording the award, accumulation and transfer of credit is in place. This central system has not yet been delivered. Nevertheless, we could see that Ascentis' IT is designed to identify the completion of the appropriate RoC and ensures that qualifications are awarded securely, accurately and quickly.

4. None of Ascentis' qualifications is graded.

5. Ascentis has procedures in place to review its awarding and certification arrangements. Teams look at various sections of Ascentis' work, as revealed in the self-assessment plan, which forms an appendix to the strategic plan.

6. Ascentis uses archived materials to standardise assessments across time and in relation to other factors. Ascentis told us that it was not yet satisfied with its procedures in this respect.

7. We looked at the specimen credit certificates and qualification certificates and noticed some inconsistencies with the requirements. For example:

    *   the date on the certificate was that of moderation rather than the date of issue

    *   the title of the qualification on one of the specimen certificates differed from that appearing within our national database.

8. Ascentis must revise its certificates and ensure they meet the QCF regulatory arrangements in full.

9. With regard to replacement certificates, Ascentis marks them clearly as such and has adequate procedures for their issue. The border around the certificates is good practice in preventing easy removal of information, such as of the word 'replacement', by guillotining the bottom of the certificate.

Non-compliance

2. Ascentis must ensure that its credit and qualification certificates contain the information required in the form approved by us.

    (*Regulatory arrangements for the Qualifications and Credit Framework* (2008), paragraphs 5.13a, 5.15a, and annexes C and D).

Observations

10. Ascentis should consider whether the award of credits is made as quickly as security permits.

11. Ascentis should complete its review of the methods used to archive assessments over time.

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