

**Ofqual**  
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# **Post-Recognition Monitoring Report**

**Council for Awards in Children's Care and Education  
(CACHE)**

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March 2010

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## **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 make observations on ways that 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-compliances 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 the Council for Awards in Children's Care and Education (CACHE) awarding organisation and was carried out by Ofqual in March 2010. It draws together our findings on areas of:

- management and governance
- resources and expertise
- diversity and equality
- unit/qualifications development – planning
- unit/qualifications development – development
- unit/qualifications development – design and development of assessment
- delivery of assessment

This is the first post-recognition monitoring activity on CACHE in respect of the Qualifications and Credit Framework (QCF) since the awarding organisation received supplementary recognition in 2009.

The monitoring activities included desk research of information already held by us, examination of CACHE's supplementary recognition application and scrutiny of the awarding organisation's website. We visited CACHE's head office to conduct interviews with staff and review documentation.

This report draws together our findings from these monitoring activities.

## **About CACHE**

CACHE was established in 1994 as a result of a merger between the National Nursery Examination Board and the Council for Early Years Awards. The awarding organisation offers qualifications from Entry Level to Level 6. For further information about CACHE and the qualifications it offers, visit its website at [www.cache.co.uk](http://www.cache.co.uk).

## Management and governance

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

### Findings

1. CACHE is a charitable company limited by guarantee. Its governing body is the Board of Trustees. Delegated authority lies with a number of committees. The two of greatest interest to us are the Executive Committee and the Quality and Standards Committee.
2. CACHE provided us with terms of reference and minutes of these committees as well as some others that had recently been replaced or reconstituted. It was useful for us to look at copies of minutes for these superseded committees.
3. CACHE has recently undergone a reorganisation in response to the new qualifications framework, the QCF. CACHE stated that its ability to create units and qualifications was restricted by the dictates of the sector bodies, contrary to the aims of the QCF, one of which is to provide learners with a greater choice and range of opportunities. This concern was noted by us and we asked for more information to be made available.
4. One sector body in particular was said to have refused to endorse any qualifications other than those it had developed itself. As a result, CACHE states that if this continues to be the case it may have less need for subject experts in-house and more need for programme managers who control a panel of outside consultants.
5. The Chief Executive is the single named point of accountability for the three regulated functions CACHE fulfils: developing and submitting units; developing rules of combination (RoC); and operating as an awarding organisation. There is a named individual responsible for maintaining quality in relation to the first two of these regulated functions.
6. We looked at the terms of reference and minutes of committees along with an organisation chart. We were satisfied that CACHE had kept us fully informed of the changes it was making in its governance arrangements, which were clear.
7. No potential conflicts of interest between functions were identified. The company was aware of the dangers and had stopped being a National Training Organisation in 2004. Trustees declared any personal conflicts of interest annually and left the meeting if any matters arose that involved their declared interests.

8. CACHE stated that it does not currently work with any other organisation in relation to its three regulated functions. However, CACHE also stated that one sector skills council (SSC) had developed some units and RoC and asked it to submit them on its behalf. The awarding organisation stated that it had felt pressured into doing so. Where more than one organisation contributes to a regulated function, the organisations must identify the lead organisation responsible for quality assurance. This body must be a recognised organisation. Currently, the SSC referred to is a legacy body, having received recognition for the QCF tests and trials when the new framework was being developed. It has not yet applied for full recognition. We asked CACHE to provide it with evidence if it felt that a written statement of responsibilities of each organisation was appropriate.

### **Non-compliance**

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

### **Observations**

1. CACHE should decide whether it needs to take action to review any of the units it has submitted. It should provide us with evidence of any concerns.

## 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 looked at the last set of audited accounts which were for the year ending 31st August 2008. The Trustees' report contained much useful information on CACHE's reserves policy, investment policy and performance. The auditor's report was unqualified and confirmed that the Trustees' report was consistent with the financial statements.
2. The Chief Executive discussed the financial strategy of CACHE with us. He brought CACHE's financial position up to date with unaudited figures and an explanation of recent financial decisions, such as the recent change of premises.
3. We were satisfied that, based on the information provided and for the life of the units and qualifications it develops and offers, CACHE has sufficient financial resources to meet demand for its services.
4. CACHE has reviewed its staffing requirements in the light of the QCF. It uses a combination of employed staff and an externally recruited expert panel. Panel members are experts in their field and are contracted to work for CACHE on an ad-hoc basis. CACHE has considered which skills it requires and recruited accordingly. It believes that this strategy will ensure that the skills and knowledge available to it are current.
5. Similarly, CACHE evaluated the skills it required in-house and decided that more project management ability was required to handle the expert panel's contributors. Staff had to re-apply for their jobs in certain cases. CACHE showed us job and person descriptions that had been created during this exercise.
6. Staff CVs are held by the human resources department and details of the expert panel are held on a database. We were satisfied that CACHE's HR strategy provides for sufficient staff and associates to support its services.
7. CACHE's procedures ensured that its expert panel and staff gave it access to expertise in subject/sector areas as well as in the design and development of units and RoC. As an existing awarding organisation, CACHE had proven experience in assessment and awarding.

8. We looked at evidence of training provided to CACHE staff and, in particular, we checked to ensure that the knowledge and expertise was capable of being applied to the QCF. For example, could the existing awarding and assessment expertise be applied to inform unit design?
9. Not only was there evidence of programmes of in-house training, including a general explanation of the new system, but also that CACHE staff took advantage of training and guidance provided by the Qualifications and Curriculum Authority (QCA) as well as Ofqual. CACHE had participated in the tests and trials as methodologies for QCF unit development and RoC were evolving.
10. We noted as good practice that the checklists used in unit and qualification development contained clear sign-off requirements that defined the expertise required for this action.
11. When CACHE reviewed its needs for the QCF it also looked at its IT system and decided to update an eight-year-old database. A major project is under way and is due for completion by September 2010. References to the Trustees' monitoring of this appear in the Board's minutes.
12. We asked about business continuity strategy and disaster recovery plans. These were on course but had not kept up with all of the major changes. Nevertheless, we were satisfied with the evidence of work in progress that this work was being actively pursued.

## **Non-compliance**

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

## **Observations**

2. CACHE should ensure that it completes its arrangements for business continuity and disaster recovery.

## Diversity and equality

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

### Findings

1. The QCF equality and diversity ethos is embedded in the aims, policies, and procedures of CACHE and should be seen as best practice. Equality and diversity will be monitored through a recently developed and detailed procedure and is also covered within the Annual Report of Trustees.
2. CACHE ensures its legislative compliance through dialogue with the organisation's solicitors, standardisation events and facilities management process.
3. CACHE provides embedded QCF equality and diversity training for all team members, including an Expert Panel.
4. Individual centres work closely with CACHE to ensure qualifications can be accessed by individuals with specific and additional learning needs through reasonable adjustments. This is good practice.
5. CACHE's centre Advisors ensure the equality and diversity policy is adhered to at centre level through monitoring of independent learning plans (ILPs), independent candidate interview and questionnaire. Any issues identified are reacted to and if necessary escalated within CACHE. This is an example of good practice.
6. CACHE showed it has appropriate procedures to ensure equality and diversity is considered as an integral part of unit, RoC and qualification development. Where barriers are identified, specialists such as the Royal National Institute for the Blind are commissioned to advise and guide. These procedures, however, should be further developed to ensure formal recording of discussion that takes place with regard to barriers to learning.
7. CACHE has recently initiated a new flexible internal assessment approach to all learner internal assessment methodology. By providing detailed assessment opportunities, guidance to centres through specifications, learner workbooks and 'How to....' guides, CACHE ensures it supports the equality of opportunity to assessment for all its learners to a high standard.
8. CACHE provides a detailed *Good Practice Guide to Reasonable Adjustments / Special Considerations in Vocational Qualifications*. This guide is written with clear text and no ambiguity. Centres have the opportunity to contact CACHE

Head Office or their Centre Advisor to clarify an application or seek guidance. This National Qualifications Framework document is currently being updated to incorporate the QCF regulatory arrangements.

9. CACHE makes appropriate reasonable adjustments to standard assessment arrangements wherever they are required to enable access. Centres are encouraged to apply within set timeframes, although applications will be facilitated until the last possible moment.

### **Non-compliance**

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

### **Observations**

3. CACHE should consider further developing its procedures to ensure formal recording of any discussions that take place with regard to barriers to learning.

## Unit/qualification development – planning

This is subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008), paragraphs 3.2 a–b, 4.2, 4.3a, 6.2a.

### Findings

1. We were provided with a detailed set of processes, procedures and checklists setting out the approach taken by CACHE to the planning of its qualification provision. CACHE maintains a central register of business processes with a standard naming convention and clear version control for all procedural documentation. This discipline greatly assisted us when reviewing these documents.
2. As part of its transition to a matrix organisation, CACHE has restructured its activities around seven core processes. We discussed the details of the core process for qualifications and services portfolio management with senior development staff. CACHE maintains a long-term and a medium-term strategic view of its portfolio that, in turn, informs its short- to medium-term portfolio action plan.
3. We were satisfied that this process ensures that the unit and qualification development activity undertaken by CACHE is informed by the outcomes of its other core processes, in particular market sensing and customer linking, and effectively incorporates the demands of the SSC and other statutory bodies that operate in the sphere in which CACHE delivers its qualifications.
4. Once the portfolio action plan has been agreed at a strategic level, individual qualifications are developed according to a well documented and detailed procedure based on a project management approach. Each development starts with a business case that must be approved by the executive team.
5. The business case sets out detailed information relating to the relevant sector qualifications strategy, market research, including details of existing units and qualifications, cost benefit analyses, and a consideration of any developments or changes relevant to the project.
6. Following approval of the business case, a comprehensive project initiation document (PID) is produced, setting out the proposed arrangements for undertaking the development work. The PID details the expertise requirements and provides a quality-assurance matrix for the project. This document includes a full market research report and a qualification overview.
7. The qualification overview sets out the rationale for the qualification and specifies the:

- main purpose
  - target learners
  - intended progression routes
  - proposed size and level
  - RoC and units
  - proposed assessment approach
  - diversity and equality issues specific to the qualification (if any).
8. During the development and sign-off of the business case, the PID, and the qualification overview, CACHE undertakes multiple searches of the unit databank to assess the availability of suitable units for inclusion in the proposed qualification. In addition, CACHE has procedures in place to monitor the unit databank regularly throughout the qualification development period to ensure that any appropriate units that become available during this time can be included in the qualification proposal.
  9. CACHE produced evidence that this procedure is implemented effectively as part of its ongoing development projects. This proactive approach to the interrogation of the unit databank is an example of good practice and demonstrates a willingness to implement the regulatory requirements of the QCF in the spirit intended.
  10. During the development process, the PID and the business case are monitored and reviewed every two to three weeks by senior development staff to ensure that the project remains viable and on course to meet its objectives.
  11. The procedure for unit and qualification development clearly indicates how and when CACHE interacts with SSCs and other relevant bodies during the development period as part of the early dialogue and approvals process.

## **Non-compliance**

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

## **Observations**

There are no observations in relation to this section.

## Unit/qualification development – development

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008), paragraphs 3.2 c–g, 4.2, 4.3 a–f.

### Findings

1. CACHE provided us with coherent and well-documented procedures and checklists for unit and qualification development, together with documented evidence to demonstrate that the procedures were being implemented. We were satisfied that these procedures were being implemented effectively and consistently and that CACHE was taking a proactive approach to reviewing and refining its systems and procedures on an ongoing basis.
2. The procedure for unit and qualification development sets out the main roles and responsibilities of the staff involved in its implementation and clearly demonstrates how CACHE ensures that expertise in the design and development of units, RoC and assessment methods is used appropriately throughout these activities.
3. The PID, the qualification overview and the business case are referred to and updated regularly throughout the development process by the development manager and the qualifications team manager. At the outset of the unit development phase, a full interrogation of the unit databank is undertaken, and such interrogation is repeated at regular intervals throughout the development activity, to ensure that the information contained in these documents is up to date.
4. Documents are reviewed regularly by the development manager, who is responsible for identifying and escalating any issues or risks. We looked at examples of how documents were used as part of the development procedures and were satisfied that the procedure was followed consistently. We noted as good practice the clear use of version control throughout development activity.
5. CACHE has an iterative unit development process. Draft units are written with reference to the guidance materials and a unit-writing checklist developed by CACHE. These draft units are then subject to a review of content, credit value and level by a group comprised of vocational and technical experts, including members of the compliance and quality performance (CQP) team.
6. A detailed checklist is used to capture any aspects of a unit that require further work and to provide feedback to the unit writers. This template also captures information about the rationale for the level and credit value of each unit based on a detailed analysis of each learning outcome. Once all identified issues have

been addressed, the checklist is signed off by a member of the CQP team who has not been involved in the writing and reviewing activity.

7. We looked at completed examples of these checklists and were satisfied that this was an effective method for ensuring that units adhere to the design specifications of the QCF. It also ensures accuracy and consistency in the determination of the levels and credit values of units.
8. CACHE is involved in collaborative unit and qualification development projects with other awarding organisations led by sector organisations. As part of this process CACHE participates in group activities to review draft units and to agree their content, credit values and levels.
9. Where CACHE is called upon to submit units or qualifications developed in this cooperative way it ensures that these are subject to the same review process as their own units and qualifications. During discussions with us CACHE staff demonstrated a clear understanding of the responsibilities attendant upon their regulated functions in the QCF.
10. The procedure for developing RoC starts with the development of the qualification overview as part of the PID. In this way CACHE ensures that the rationale for a RoC and its structure are developed hand in hand. We looked at examples of the qualification overview and were satisfied that this was an effective method for developing the rationale for a qualification and for ensuring that the defined combination of units supports the rationale.
11. Once the unit development phase is complete and all units that need to be developed have been signed off, the RoC for a proposed qualification is finalised using a detailed checklist that has been mapped to the *Regulatory Arrangements for the Qualifications and Credit Framework (2008)*. Again, this checklist is used by a group of vocational and technical experts, including members of the CQP Team, to review the draft RoC and log comments about any aspect that needs further work.
12. The checklist captures the rationale for the RoC together with a profile of the combination of units that it defines. The checklist specifies the required credits from units that have already been submitted to the databank. It also sets out clearly the opportunities for credit transfer from equivalent units and the exemptions that can be claimed. Once all identified issues have been addressed, the checklist is signed off by a member of the CQP Team.
13. We were shown completed examples of checklists and were satisfied that this was an effective method for ensuring that RoC adhere to the design specifications of the QCF and ensure coherent combinations of units that make

appropriate use of RoC design features, consistent with the rationale for the qualification.

### **Non-compliance**

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

### **Observations**

There are no observations in relation to this section.

## Unit/qualification development – design and development of assessment

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008), paragraphs 3.2 c–g, 4.2, 4.3 a–f.

### Findings

1. The assessment approach for a proposed qualification is captured at the outset of the development procedure in the qualification overview. As noted above, the qualification overview, together with the PID are reviewed at regular intervals throughout the development period. This ensures that unit and RoC development activities are informed by the intended assessment approach.
2. We looked at a unit assessment checklist developed by CACHE to ensure that its assessment methods for its qualifications met the requirements of the QCF. This checklist requires any proposed exams or mark schemes to be reviewed against the relevant regulatory design requirements and the diversity and equality requirements of the QCF. The checklist is completed as part of the development process and subjected to review and sign off by a member of the Compliance and Performance Team.
3. We looked at some completed checklists and were satisfied that this was an effective way of ensuring that assessment methods are developed in accordance with the requirements of the QCF.
4. As part of its process for developing the assessment methodology for a qualification, CACHE also develops guidance to be issued to its centres. This is to ensure that assessments are delivered in accordance with the requirements of paragraph 5.3 of the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008) and that assessment instruments and tasks are produced to the required quality standards.
5. We looked at minutes of development meetings where the format and content of the guidance to be produced in relation to QCF qualifications was discussed and agreed. This included guidance for centre advisors, guidance for centre staff, and handbooks for assessors and learners.
6. We looked at examples of guidance and noted that information about how assessment of groups of units could be delivered holistically was provided. The guidance ensured, however, that the point at which learners had completed individual units, could also be identified, in order to allow unit achievement.
7. We were satisfied that the procedures CACHE has in place ensure that centres offering qualifications in the QCF are provided with the information, advice and

support necessary to ensure consistent and equitable delivery of accredited qualifications in accordance with paragraph 6.3 of the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008).

8. Before submitting a qualification proposal to us for accreditation, CACHE uses a qualification design checklist to review the details and materials for each unit and to review the qualification details. The checklist includes a check to ensure that all stages of the development procedure have been completed and signed off. It also ensures that the qualification as a whole meets the design specifications, and the diversity and equality requirements, of the QCF.
9. We looked at examples of the completed checklist where it had been used to sign off the completion of previously developed qualifications. We were satisfied that CACHE has in place a clear procedure to review and sign off the quality of the qualification to be offered prior to submission for accreditation.

### **Non-compliance**

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

### **Observations**

There are no observations in relation to this section.

## Delivery of assessment

This is subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008), paragraphs 2.12, 5.5–5.11 and 5.16.

### Findings

1. We were provided with several documents, including the qualification pack for the CACHE QCF Level 3 qualification in Learning Support. These documents identify administration, tutor guidance and assessment opportunities for this qualification. CACHE produces other guidance documents through its customer forum events and on its website, where they can be downloaded by centres.
2. CACHE provided evidence of robust procedures for standardisation of work by centre advisors, CACHE trainers and regional quality managers. Processes for internal and external standardisation are clearly stipulated. Specifications where there is internal assessment make it clear that all centres must undertake internal standardisation.
3. CACHE has, historically, offered standardisation meetings for all qualifications for centres on an individual, local, regional and national basis. It has indicated that this will continue in the QCF. Attendance by centres is encouraged and costs are subsidised.
4. Procedures are in place to monitor the work of all centre advisors through the 'Managing qualification quality assurance' procedure. Quality managers sample centre advisors reports on a monthly basis. All samples are evaluated, with full feedback given. Regional managers then monitor centre Advisor / quality manager monthly returns and give feedback where necessary.
5. Through a parallel process, quality managers carry out one announced and one unannounced visit per centre advisor per year. Risks identified through this process inform senior staff of necessary training requirements and sanctions.
6. CACHE has, in the past, offered some qualifications in the Welsh language and will continue to do so in the QCF. CACHE has systems in place to ensure that qualifications meet the required standards and are consistent with qualifications offered in English.
7. Comparability of assessment is ensured through a robust process of translation, contextualisation and review. Candidates are offered assessment in both English and Welsh on the same document, ensuring equality of access. Welsh medium examiners are given both English and Welsh assessments to mark to ensure comparability. This is an example of good practice.

8. CACHE's communication with its centres is excellent. Centres and assessors are kept abreast of developments and guidance through the organisation's website, published FAQs, centre advisor communications, monthly QCF newsletters and operation/enquiries staff. This is good practice.
9. CACHE, through its flexible assessment strategy and tutor guidance, gives centres the opportunity to assess units on both an individual basis and holistically over a number of units. This is available for a number of its qualifications.
10. Quality and appropriateness of assessment guidance is evaluated through the CACHE 'Virtual Panel'. This panel consists of volunteers from centres identified during regional customer forums. This process ensures assessment methodology is fit for purpose and industry appropriate.
11. CACHE has recently embarked on a new quality standards monitoring pilot. The rationale behind the new model is to "maintain the integrity of CACHE qualifications while empowering centres to take responsibility for internal quality assurance; and to be less bureaucratic and more resource effective for both CACHE and centres yet still meet, at the very least, the minimum quality assurance thresholds".
12. The pilot is based on four risk-based stages. The CQP Team, through bi-monthly review and evaluation, will consider its effectiveness and, where necessary, change or withdraw methodologies. This is good practice.
13. CACHE gives equality of access to its qualifications through its flexible assessment strategies. There is, however, an access issue for learners under the age of 18 within the CACHE Level 3 qualification in Learning Support due to their young age or employment status. This is due to a sector requirement and therefore not under the control of CACHE. It is, however, still a barrier to assessment and learning.

## **Non-compliance**

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

## **Observations**

4. CACHE should pursue its sector bodies to ensure that barriers to access are eliminated where possible.

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