Ofqual

Llywodraeth Cynulliad Cymru
Welsh Assembly Government

Rewarding Learning

Post-Recognition Monitoring Report

Central YMCA Qualifications Awarding Organisation

July 2010

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Contents

Introduction

Regulating qualifications

The responsibility for regulating qualifications lies jointly with three regulators respectively:

- 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) for 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.

Non-compliances 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 the non-compliances identified through monitoring activity. 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 as to future monitoring and/or the possible imposition of sanctions.

Banked documents

As part of their awarding organisation recognition processes, the regulators require awarding organisations to submit certain documents to Ofqual for the

purposes of 'banking' them centrally. Information from banked documents will be used to inform monitoring activities and may also affect the awarding organisation's risk rating.

A suite of documents has been identified as suitable for banking and are those 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 Central YMCA Qualifications awarding organisation (CYQ) and was carried out by Ofqual staff in July 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 CYQ 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, CYQ's supplementary recognition application and scrutiny of the awarding organisation's website. Our monitoring team visited CYQ's head office to conduct interviews with staff and review documentation. Centres were not visited as there had been little or no QCF activity at centre level to date.

This report draws together our findings from these monitoring activities.

About Central YMCA Qualifications

CYQ is part of Central YMCA. The Central YMCA was the world's first YMCA and was founded in 1844. The awarding organisation offers qualifications mainly in exercise and fitness. For more information about CYQ and the qualifications it offers, visit its website at www.cyq.org.uk.

Management and governance

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

Findings

1. The Central YMCA Ltd is a company limited by guarantee and a registered charity. It operates an awarding organisation that trades under the name Central YMCA Qualifications (CYQ). It also operates as a training provider for its own qualifications.

2. There is a chief executive for the group, but there is separation of control of the awarding organisation and the training arm. The single named point of accountability for all the regulated functions of CYQ is the Director of Awarding. No instances were found of any joint ventures or potential conflicts of interest that were not properly managed.

3. CYQ provided us with an organisation chart. An independent committee had been set up, with one of its objectives to oversee any potential conflicts of interest within the organisation. We examined its terms of reference and noted that the intention to manage conflicts of interest was not sufficiently explicit in the independent committee's functions. It is recommended that the intention is made explicit.

4. CYQ told us that it had considered working with other organisations in respect of its regulated functions. No definitive work had emerged, so there had been no need to draw up any written statement of responsibilities.

5. We found the organisation of the Central YMCA group and of the awarding organisation to be clear and with adequate division of responsibilities.

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

Non-compliances

There are no non-compliances for this section.

Observations

1. CYQ should recommend that the functions of the independent committee stated in the terms of reference must include a duty to monitor any

potential conflicts of interest within the YMCA group that relate to the CYQ.

Resources and expertise

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

Findings

1. We discussed with the Head of Qualifications Development the procedures CYQ 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. Evidence was provided in terms of CVs of selected staff against job roles and person specifications. There was also information on the training that had been provided in-house, as well as the external training taken up, for example at the Qualifications and Curriculum Authority/Qualifications and Curriculum Development Agency (QCA/QCDA), the framework developer.

2. As an existing awarding organisation, CYQ could evidence sector and subject expertise. It could also evidence assessment and awarding expertise. In conversation and in its documentation it made the distinction between qualification development, which was the focus of the previous qualification framework, and the unit-based procedure for the QCF.

3. Evidence was shown to us in respect of CYQ's in-house training events and their content. CYQ had taken part in the tests and trials of the QCF. Centre staff had also been provided with training on the QCF.

4. We were satisfied that CYQ had the skills and expertise required to operate within the QCF, in terms of product development. We were satisfied that CYQ 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.

5. At the time of monitoring, CYQ had not experienced much centre activity in respect of the QCF, and it was not possible, therefore, for us to test its arrangements by means of centre visits.

Non-compliances

There are no non-compliances for this section.

Observations

There are no observations for this section.

Diversity and equality

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

Findings

1. CYQ has its own diversity and equality policy, which is embedded in every aspect of its work. Discussion with CYQ staff and the review of various documents showed that CYQ is committed to ensuring equality for all learners and minimising barriers to entry to their units and qualifications.

2. CYQ ensures legislative compliance via its human resources team, which is responsible for reviewing the equalities legislation. The team keeps up to date with changes to the law and cascades them to the rest of the organisation.

3. CYQ has provided its staff with diversity and equality training through a consultant. Centres have also received diversity and equality guidance. External verifiers' reports focus on diversity and equality. CYQ external verifiers have sight of centres' policies and note any training that centres provide. Diversity and equality is mentioned in CYQ's annual report.

4. Diversity and equality is taken into consideration in the unit development process, and forms part of the quality assurance checklist. CYQ then reviews this process by means of the Qualifications Review Group, which also takes learner feedback into account. This committee is made up of training providers, employers, tutors and people who have worked with learners with various learning needs. It has overall responsibility for ensuring CYQ's compliance with both QCF and legislative requirements in relation to diversity and equality.

5. CYQ does not state any barriers to entry. Its units and qualifications are open to all learners, regardless of learning needs. For example, a blind student was recently awarded the *CYQ level 2 Certificate in Fitness Instructing (Gym)*, a licence to practise. CYQ had consulted with Royal National Institute of Blind People (RNIB) to facilitate access. It anticipates this type of consultation will increase.

6. Clear guidance is given to centres on reasonable adjustments and special considerations, and there are recording mechanisms in place.

7. CYQ encourages feedback from centres on the issue of access. The front page of the external verifier's report provides space for learners to

feed back to the awarding organisation. CYQ has devised pathways within its qualifications to provide for access to particular groups, as diverse as learners in schools and prisons.

8. CYQ has a thorough reasonable adjustments policy, which is available online. Centres have some flexibility in making their own reasonable adjustments, and this flexibility is defined by CYQ. In other cases they must apply for central CYQ approval. All reasonable adjustments must be recorded by the centre and are checked by the external verifiers during their visit.

9. In addition, while the organisation did collect some data through its various functions, it is questionable whether or not the organisation has adequate procedures in place to collect sufficient data to allow it to effectively monitor and evaluate its compliance with paragraphs 2.11−2.13 of the QCF Regulatory Arrangements.

10. CYQ is now collecting data on diversity and equality but, at the moment, does not have adequate procedures in place to allow it to effectively monitor and evaluate its compliance with paragraphs 2.11−2.13 of the QCF Regulatory Arrangements. This is under review as part of the introduction of its new computer system, known as Parnassus.

Non-compliances

There are no non-compliances for this section.

Observations

2. CYQ should review its data collection in order to ensure that sufficient data is collected to allow it to effectively monitor and evaluate its compliance with requirements.

Development of units and rules of combination for qualifications

Subject to the *Regulatory arrangements for the Qualifications and Credit Framework* (2008), paragraphs 3.2–3.4 and 4.2–4.4

Findings

1. On the day of the monitoring visit, CYQ provided various QCF-related documents on a memory stick. This memory stick contained its standard operating procedures (SOPs). These are the processes and procedures that CYQ uses for its qualification development. They are also used by all its unit developers. Some additional evidence was provided in paper-based format.

2. The current procedures for a unit and qualification development within CYQ have taken the form of redeveloping existing National Qualifications Framework (NQF) units and ensuring that these units are QCF compliant. The only other qualification developments have been achieved by making use of shared units from the QCF national unit databank (for example, units developed by another awarding organisation) in a new RoC.

3. CYQ is not currently awarding any QCF qualifications. However, the various SOPs provide details of how CYQ will comply with the QCF arrangements. The monitoring visit focused on these documents.

4. Within CYQ, the overall responsibility for quality assurance and qualifications development is the responsibility of the Head of Qualifications Development. The Head of Qualifications Development has oversight of the process and those involved in the development of qualifications and units. The Head of Qualifications Development is not only responsible for signing off the units but is also involved in their development.

5. CYQ has an SOP that establishes the rationale for its qualifications development. This rationale comes from gathering market intelligence from different sources, including the Sector Skills Council (SSC) and its Sector Qualifications Strategy (SQS). Unit and qualification development at CYQ takes the SQS into account. Additionally, there are a number of charitable objectives of the wider YMCA organisation that impact on the business of CYQ. Market intelligence and charitable aims are distilled into the *Qualification Development Strategy*. This document was made available to us.

6. CYQ provided an SOP for the interrogation of the QCF national unit databank when developing its own units. This SOP contained all the tasks that needed to be completed to meet the requirements of the QCF *Regulatory Arrangements*, together with the job title of the person responsible for each task. The Qualification Development Manager (QDM) has oversight of the SOP and responsibility for ensuring that the tasks are completed.

7. SkillsActive is the SSC that works with CYQ, and it has developed a number of shared units in collaboration with other awarding organisations. Currently, CYQ does not have a partnership with other awarding organisations in the development of any units, RoC or qualifications.

8. CYQ has an SOP to help in determining the level and credit value of its units. Additionally, CYQ has a credit assignment template, which is used by staff to assign credit and level to a unit. The credit value is reviewed by other staff who have not been involved with the development of the unit. This review will determine if the level and credit value of that unit is correct. This is the only way in which CYQ determines if the level and the credit assigned are accurate. It might be useful if a reference was made for comparison purposes to whatever may exist in the QCF national unit databank.

9. CYQ provided the *CYQ Decision Making Framework* as evidence of how, when developing units, it complies with the design features within section 1 of the QCF *Regulatory Arrangements*. This framework is the overarching framework that determines if the unit meets the CYQ's aims and objectives. Compliance with the design features is also verified against a checklist as part of the quality assurance.

10. For the RoC, CYQ has an internal process that looks at the review of the unit and RoC together before they are signed off by the Head of Qualifications Development. This again is provided within an SOP, called *Developing QCF Qualifications*. The SOP provides for a review and amendment of the units and RoC prior to final sign off, to ensure that everything is in the format required by us.

11. The Head of Qualifications Development signs off the quality of the unit prior to it being submitted onto our QCF national unit databank.

12. The unit review process could not be tested, as CYQ has not been through a complete cycle of awarding QCF credits and qualifications. However, CYQ has an SOP for such a review.

13. CYQ does not develop the RoC separately. The development is done at the same time as the unit, and many of the processes are developed jointly. These processes are contained in the SOPs.

14. The rationale for the RoC is developed out of the rationale for the qualification. The Sector Development Team is responsible for the market research that determines the qualification rationale and, therefore, the rationale for the RoC. This rationale is reviewed and ratified by the Head of Qualifications Development.

15. CYQ provided us with an SOP for interrogating the QCF national unit databank, which included the tasks and the members of staff who were responsible for completing them.

16. Evidence of how the CYQ complies with the design features within section 1 of the Regulatory Arrangements is embedded in the *CYQ Decision Making Framework*. This framework is the overarching framework that determines if the RoC meets the CYQ's aims and objectives. Compliance with the design features is verified with a checklist as part of the quality assurance. This provides checks that the unit designers have met the requirements.

17. Ensuring that the RoC uses a meaningful and coherent combination of units that reflects the rationale for the qualification is the responsibility of a number of CYQ staff. These include the Head of Qualifications Development, the QDM and a technical contributor.

18. The Head of Qualifications Development, the QDM and the technical contributor have a duty to maximise the opportunities for credit accumulation and transfer and exemption, and this is clearly outlined in the SOP for interrogating the QCF national unit databank.

19. The RoC review process could not be tested as, currently, CYQ has not awarded any QCF credits or qualifications.

Non-compliances

There are no non-compliances for this section.

Observations

3. CYQ should ensure that the unit sign off is provided by someone who has not been involved with the unit development.

4. CYQ should develop a fuller SOP for determining credit and level.

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 key to CYQ's design and development of assessment is derived from the review process. This process involves using groups of expert stakeholders, who review the assessment methods to ensure that they are fit for purpose. This expert review group provides feedback on the assessment method. This feedback helps to ensure that the design of units and RoC meet the requirements of industry and other stakeholders' needs.

2. To ensure that the assessment methods comply with section 1 of the QCF *Regulatory Arrangements*, CYQ has a checklist that the technical contributors use. The checklist is completed as the assessment method is developed, and is reviewed by the QDM and the Head of Qualifications Development. An SOP provides guidance for the technical unit writer.

3. CYQ ensures that the assessment criteria cover all the learning outcomes. CYQ stipulates the assessment methods, but centres may create their own assessment instruments.

4. CYQ has a process for developing assessment methods, which will allow individual assessment of all the learning outcomes. However, this could not be tested, as CYQ has not yet awarded QCF credits and qualifications.

5. CYQ has developed assessment instruments and assessment methods. From these, centres obtain guidance on what is sufficient evidence for the learning outcome to be achieved. CYQ devises workbooks and e-assessment packages for its centres. However, there is no SOP or checklist for what CYQ does in terms of quality assurance when a centre develops its own assessment instruments.

6. CYQ confirmed that it is aware of the additional requirements section of the unit template, which recognised organisations use to submit their units to the QCF national unit database. The unit template also has an additional requirements section for assessments (for example, where an SSC has stipulated that a unit must be assessed in a certain way). We saw evidence of this in a unit's completed template.

7. CYQ ensures that a review group takes into account information from centres, external verifiers and learners, to help minimise any potential barriers to assessment.

8. CYQ has an SOP for ongoing review of its assessment methods.

Non-compliances

There are no non-compliances for this section.

Observations

5. CYQ should provide sufficient guidance to centres to ensure a judgement of the sufficiency of the learners' learning outcomes is made when the centre creates assessments.

Delivery of assessment

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

Findings

1. CYQ provided us with evidence of the defined roles and responsibilities for staff involved in the delivery of assessment. Performance evidence is assessed at centres by internal assessors and verified by internal and external verifiers. Workbooks are set by CYQ and marked internally by centre staff against a CYQ mark scheme. Assessments of understanding (theory papers) are set and marked by CYQ.

2. CYQ provided us with evidence of how theory papers are produced. The process begins with the item writers being given a brief. They produce the assessment instruments to a standard defined by CYQ within its guidance documents.

3. Theory papers are subsequently proofread and checked against the standard by the QDM. Once a draft has been agreed, it is sent to centres for piloting.

4. We were provided with evidence of how authenticity of evidence is confirmed. Learners, assessors and internal verifiers complete a declaration. The declarations are sampled by the external verifier when visiting the centre.

5. Accuracy and consistency of standards of assessments across units and over time could not be tested, as CYQ has not yet awarded any credits or qualifications. However, CYQ was able to provide us with a process that will be used.

6. CYQ provided evidence of the minimum expertise requirements that people involved with the assessment process must possess. Updates and other information are provided to centres via centre training days. In particular, CYQ has provided QCF readiness days. CYQ also provides e-bulletins to all centres on a regular basis.

7. Centres' assessors and internal verifiers are provided with training by CYQ. External verifiers verify, on a sample basis, that centre staff have the required knowledge and skills.

8. External verifiers have continuing professional development, and they are required to attend a number of standardisation meetings per year.

9. The external verifiers' work is reviewed by a regional verifier. The chief verifier checks the work of regional verifiers and reports to a member of the CYQ staff. Where the performance of verifiers is not up to standard, an action plan for improvement is drawn up and agreed.

10. CYQ has provided guidance to the centres about retaining sufficient evidence of assessment decisions, and for how long.

11. Recognition of prior learning and exemptions can both be accommodated in the IT system that CYQ has for the QCF. The system is available to the centres to upload data.

12. CYQ has procedures to avoid conflicts of interest or to manage them where they are unavoidable. External verifiers complete a declaration, which is updated yearly. This information is held centrally and used when allocating centres to external verifiers.

13. CYQ has procedures that provide details of the standardisation process and the sampling strategies, which the internal verifiers and external verifiers have to comply with.

14. At the time of the monitoring visit to CYQ, the review process of delivery of assessment could not be tested, as CYQ has not been through a complete cycle of awarding the QCF credits and qualifications. However, CYQ has an SOP for the ongoing review of assessment methods.

Non-compliance

There are no non-compliances for this section.

Observations

There are no observations for this section.

Centre recognition

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

Findings

1. CYQ 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.

2. The centre approval form also requires centres to agree to provide access for both the awarding organisation and the regulators to the centre's premises, records and staff. The form, together with external verifiers' visits, ensures that centres have the necessary staff, resources and systems to support the assessment of units.

3. The approval application only asks the question of whether the centre is in a partnership arrangement with other organisations if there are satellite centres, but it is a regulatory requirement that the respective roles and responsibilities are documented in all cases.

4. However, the agreement that centres must sign includes all the regulatory requirements, so it is possible that a centre would make the declaration under this prompting. We would prefer to see the question asked on the application form.

5. Centres had not started to use the QCF units and there was, therefore, no evidence that they could support the award, accumulation and transfer of credits, or securely hold and transmit details of assessment outcomes.

6. We could see, however, not only the training that centres had been provided with, but the changes in IT arrangements that had been made at CYQ's head office. These included preparations for dealing with credit certification, and exemptions and awards made by awarding organisations other than CYQ. Recognition of prior learning is also built into the system and already embedded in centre and external verification procedures.

7. Evidence of training provided included monthly news bulletins and free training sessions. Although not compulsory, attendance at these had been monitored by CYQ.

8. Centres cannot show how they will access the learner record until a central system, external to the CYQ, for recording the award, accumulation and transfer of credit is in place. This central system has not yet been delivered. Nevertheless, we could see how the changes in IT at CYQ's head office assisted centres in tracking learners' progress by giving them access to an indication of the appropriate RoC.

9. We were satisfied that CYQ had gone as far as it could in preparing centres for operating the QCF system. CYQ will ensure that its external verifiers look carefully at the way centres deal with internal assessment, once it commences. External verification visits occur twice a year and may be unannounced. The external verifier controls the sample that centres must provide. The external verifier checks that centres track learners' progress toward their target awards.

Non-compliance

There are no non-compliances for this section.

Observations

6. CYQ should ask all its centres, when they apply for approval, whether they are in a partnership arrangement with other organisations, not just those with satellite centres.

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. CYQ is introducing a new web-based system for the award and certification of credit and qualifications. To date, there has been no internal assessment recorded on the system. CYQ has demonstrated how the system will work. The RoC is pre-set on the system, and results are fed into the system. No claim for qualification certification is, therefore, required, as the system calculates it automatically.

2. The centrally controlled external assessment by means of multiple-choice questions is highly automated and results in credit being awarded on a daily basis. Multiple-choice questions' performance is subject to periodic review, the questions and distractors having been quality assured throughout the process of writing, checking and adding them to the question bank.

3. A sample of multiple-choice questions is run through the system, monthly, to check the system is operating properly. There is an SOP for this. Internal assessments, when reported, will also have credit awarded on a daily basis. External verification will provide a check on the quality of internal assessment.

4. As mentioned earlier in this report, the central system for keeping the learners' achievements recorded has not yet been provided, so CYQ cannot record or amend anything on it, or withdraw anything from it. However, CYQ is monitoring the progress being made, so that it can participate once the scheme is launched.

5. We looked at the specimen credit certificates and qualification certificates that were being developed and noticed some differences with the requirements. These were put right during the audit. We suggested that the final versions of a credit, qualification and replacement certificate should be carefully checked against the regulatory requirements before going live. Currently, no CYQ qualification is graded.

6. With regard to replacement certificates, we thought that the procedure for agreeing to issue these could be tightened.

7. CYQ's new system of award and certification has checks built into each stage, and an annual review of all SOPs occurs. The person responsible

for the IT operation has joint responsibility for this with the head of another team.

8.   The area that CYQ needs to address lies in ensuring that the standards for the awards it makes are comparable year on year across centres, units and qualifications at the same level with the same title and, where identical units are assessed, using different assessment methods. No clear procedure for all of this was available as evidence.

Non-compliances

1.   CYQ must have procedures in place for the awards it makes to ensure standards are comparable year on year across centres, units and qualifications at the same level with the same title and, where identical units are assessed, using different assessment methods (*Regulatory Arrangements for the Qualifications and Credit Framework* (2008), paragraph 5.16d).

Observations

7.   CYQ should ensure that the revised specimens for its QCF credit and qualification certificates are checked for accuracy before issue against the requirements set out in the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008), appendices C and D.

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