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Post-Recognition Monitoring Report

Edexcel

November 2010

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Contents

Introduction.....	3
Regulating qualifications	3
Banked documents.....	3
About this report.....	4
About Edexcel	5
Management and governance.....	6
Findings.....	6
Non-compliance	7
Observations	7
Resources and expertise.....	8
Findings.....	8
Non-compliance	9
Observations	9
Diversity and equality	10
Findings.....	10
Non-compliance	11
Observations	11
Development of units and RoC for qualifications.....	12
Findings.....	12
Non-compliance	13
Observations	14
Design and development of assessment.....	15
Findings.....	15
Non-compliance	16
Observations	16

Delivery of assessment	17
Findings.....	17
Non-compliance	18
Observations	18
Centre recognition	19
Findings.....	19
Non-compliance	20
Observations	21
Awarding and certification	22
Findings.....	22
Non-compliance	23
Observations	23

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 Edexcel awarding organisation and was carried out by Ofqual in November 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 Edexcel in respect of the Qualifications and Credit Framework (QCF) since the awarding organisation received supplementary recognition in March 2009.

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

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

About Edexcel

Edexcel Ltd, a Pearson company, is one of the UK's largest awarding organisations offering academic and vocational qualifications and testing to schools, colleges, employers and other places of learning in the UK and internationally. For further information please see www.edexcel.com

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. Edexcel is a separate limited company within the Pearson group, Pearson Education UK and Pearson Education International. A recent restructuring of Pearson has introduced two business units outside of Edexcel. These units deal with work-based Learning and schools and colleges. They deal with the commercial issues of the organisation, such as marketing, sales and publications. This separation strengthens the role of the awarding organisation by reducing the potential for conflicts of interest in these areas.
2. The work of Edexcel is overseen by a Board that is directly linked to the wider Pearson group.
3. The Qualifications Committee is the main Edexcel committee reporting to the Board. The Qualifications Committee is made up of stakeholders and external members. There are three further committees which report to the Qualifications Committee. These are the review of awards committee, which is concerned with the maintenance of standards, the accountable officer's review group, which evaluates issues relating to Edexcel's regulatory activity and its status as a recognised awarding organisation, and the standards review board, which sets Edexcel's strategic direction on standards setting and maintenance.
4. There are three management groups that feed into the accountable officer's review group. These are the programme development group, quality review group and the regulatory policy group.
5. The Regulation, Standards and Research Director is the single named point of accountability responsible for the quality of the regulated functions. This Director is a part of the Edexcel executive team, alongside other directors such as the Programmes Director, Qualification Development and Assessment Director and Operations Director. The executive team is overseen by the Edexcel Managing Director. The regulations, standards and research director reports to the qualifications committee and also has a direct reporting line to the chairman of the Edexcel Board for regulatory issues.
6. Another team set up on 1st January 2010 is the Business Assurance Group, which sits within the operations directorate. The Business Assurance Group deals with regulatory compliance and internal quality, conducting a programme of internal audits.

7. All the management groups have risk logs that link to an overarching single log of business risk.
8. The Pearson group has a three-year strategic plan that is fed into Edexcel at corporate level. Taking cognisance of the overarching strategic direction, Edexcel also carries out an annual strategic planning programme to identify potential financial and human resource requirements for new and existing work. This forms Edexcel's annual business plan.
9. The size of Edexcel makes for a very complex structure. However, we consider that the lines of accountability are clear and that there are appropriate structures in place to control the delivery of regulated functions.

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, 5.2, 5.5 and 5.6e.

Findings

1. There are approximately 600 staff carrying out Edexcel's awarding organisation functions. The need for additional resources is usually identified through the annual strategic planning process. There is however the facility to make a business case should there be an unforeseen demand for additional resources.
2. New staff members are subject to an induction process throughout a probationary period. All established staff members have personal development plans, with individual objectives linked to the corporate objectives within the business plan. Learning needs will be considered by the senior management team and addressed based on individual, team and divisional need. It is mandatory for all staff to undertake diversity and equality training through an e-learning programme.
3. The revision of existing BTEC qualifications for entry onto the Qualifications and Credit Framework (QCF) was identified as a business objective. Staff awareness raising and training for the QCF was initially conducted through attendance at Federation of Awarding Body and Qualifications and Curriculum Development Agency (QCDA) workshops, and through the use of QCDA guidance materials.
4. Knowledge has been developed internally, for instance for the development leaders through programmes of training events and workshops, and for standards verifiers through quarterly divisional days.
5. Edexcel contracts with over 2000 assessment associates. The assessment associates provide the technical and subject expertise required to deliver its qualifications. Roles include standards (external) verifiers and moderators as well as the teams of examining personnel required for the general qualifications. Descriptions of the various roles and responsibilities are available on the Edexcel website.
6. A job role not included with the other assessment associates was that of unit writer. Edexcel has trained a sufficient number of individuals for this role to produce the current QCF units. However, the role and responsibilities should be formalised to allow recruitment when required and to be consistent with the arrangements that are in place for other assessment associates.

7. Unit writers are not contracted by the Assessment Associate Recruitment Team. There are separate identifying, selecting, recruitment and training processes for unit writers contained within the product development processes manual. There is a database of writers with appropriate subject expertise.
8. Edexcel recruits assessment associates through an electronic application and filtering system. Following advertisements for specific roles, individuals apply online and their applications are processed using pre-determined criteria. All senior and principal level posts are subject to interview.
9. Other assessment staff, such as the standards verifiers, attend an induction event where their suitability is reviewed using a series of standardisation exercises and other activities.
10. The majority of assessment associates are contracted annually, but for specific areas of work, such as unit and item writing, assessment associates are contracted by project. The number of assessment associates required is determined annually using sales forecasts and algorithms.
11. Edexcel has business continuity and disaster recovery plans in place. Plans are reviewed at senior management level and there is a process for the reporting and management of risk. The organisation is also working towards external certification for the national standard, BS25999. The systems have been tested through downtime to ensure full data recovery. Some of these plans were used during the heavy snow fall of last winter. Edexcel also has the use of an alternative, fully equipped office space should its main office become inaccessible for any reason.

Non-compliance

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

Observations

There are no observations in relation to this section.

Diversity and equality

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

Findings

1. Edexcel has a diversity policy document which applies to its staff and employees including those who are contracted. It contains information about different types of discrimination and harassment, and about positive action.
2. Although contracted staff are included in the scope of the document it is not clear how staff such as assessment associates are advised on the diversity policy to which they should adhere. Also, while all employees are required to undertake mandatory online diversity training this does not extend to the contracted staff working across Edexcel's regulated functions.
3. Edexcel assessment associates are expected to make decisions that require them to have an awareness of equality and diversity issues. For instance, standards verifiers may be required to check that centres have suitable equal opportunity policy documents, that these are implemented and that assessments are accessible to learners. This is also an issue when looking at centre-devised assessments.
4. The policy does not include reference to ensuring equality and diversity issues are considered in other aspects of the awarding organisation functions such as unit and qualifications development, assessment and awarding.
5. There is some evidence that diversity and equality is looked at in the product development process. Task descriptor 18 in the *Product development processes and procedures* manual is titled 'Ensuring that qualifications have been impact assessed for DDA' (Diversity and Discrimination Act). Generic information is provided to inform this activity and relevant 'DDA representatives' may be invited to the third stage of the development process (scrutiny 3). Edexcel staff said that the DDA representatives referred to were those from professional bodies such as the Royal National Institute for the Blind. However, this is not sufficient to meet the requirements of the QCF.
6. Edexcel must show that it considers diversity and inclusion within its unit and RoC development processes, and part of those processes include consultation with learners or learners' representatives. This would inform the process of identifying, and mitigating, any potential barriers during the development stage. Currently the identification of potential barriers is at the discretion and judgement of the development manager and the product development leader.

7. There is evidence that item writers are provided with training on language and style when constructing questions. The on-screen tests also include testing for design and usability, and feedback is sought from users. However, the application is not consistent across Edexcel.
8. Edexcel should review and amend its equality and diversity policy and procedures to ensure that the requirements of equalities legislation are complied with across all of its regulated functions, and that it has systems in place to ensure it does not discriminate.

Non-compliance

1. Edexcel must review how diversity and equality issues are considered in the performance of its regulatory functions; including unit/qualification and RoC development and assessment, and how it promotes equalities legislation to all those it contracts with.

(Regulatory Arrangements for the Qualifications and Credit Framework (2008), paragraph 2.11–2.13)

Observations

There are no observations in relation to this section.

Development of units and RoC for qualifications

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008), paragraphs 3.2, 4.2, 4.3 a–f and 6.2a.

Findings

1. Edexcel has long-standing and well-defined systems and processes in place for all product development. These systems and processes are covered as a series of tasks within the document *Product Development Processes and Procedures* (version 5), which details how Edexcel undertakes the project management and development of all products. These generic processes and procedures have been expanded to include the writing of units and development of RoC for the QCF.
2. Central to these systems and processes is the business development approval (BDA) model. The BDA system controls and manages the business case and process for product development from project initiation, approval and start-up, staff, associate and resource allocations, project planning and monitoring, through to project closure. These separate project areas are divided out between scoping, development and publishing phases. It is in the generic scoping and development phases that detail how the writing of units for the QCF and RoC development are to be conducted. These are accompanied by specific flowcharts to illustrate the stages of the process.
3. The BDA is monitored by a three-stage scrutiny process that ensures projects remain on target and that work activities have been completed for each stage and phase. Scrutiny three, the final scrutiny, is the formal review of the developmental work at the end of the project and results in the product being signed-off as compliant with the BDA model and fit for accreditation.
4. A number of staff and associates from different directorates and teams across Edexcel, and the wider Pearson Group, are involved in the BDA process and product development. These include unit writers, sector experts, assessment design specialists and commercial personnel. They are brought together in design groups to develop products. However, two key members of staff are central to managing the project and assuring the quality of a product. A business manager is the nominated person who is responsible for progressing the project through the BDA process and is the sponsor of a development project. A development manager is responsible for the management of the qualifications development and chairs the Design Group meetings.
5. The writing of QCF units is supported by detailed guides which give clarification and instruction to all those involved in the development of units. While these

guides and the associated BDA processes that govern the QCF product development and the writing of QCF units in particular, articulate a process to be followed, this has not been fully reconciled with the procedural requirements of the QCF regulatory arrangements, which outline the development, sign-off and review of units in a particular systematic manner. The qualifications regulators were informed that work is currently underway to achieve this.

6. Training is provided to staff and associates on writing and reviewing units of assessment for the QCF. This includes background and introduction to the QCF, the stages of writing learning outcomes and assessment criteria, and how to determine levels and credit values. The qualifications regulators were informed that these guides are in a process of review and revision to ensure greater compliancy with the QCF regulatory arrangements.
7. The mechanism to develop RoC for the QCF is located in task descriptor PD9, titled 'Designing a qualification structure'. This is a generic product development task pertaining to designing qualification structures for all Edexcel specifications. There is an additional document outlining the process for the determination of RoC for BTEC QCF qualifications. The qualifications regulators considered these in the light of the particular requirement of the QCF regulatory arrangements to have procedures in place to determine the need for a set of RoC, its development and review . It was felt that while these systems and processes incorporate RoC and forbidden combinations as a key aspect in developing a QCF qualification structure, the requirements for RoC development and review need to be explicitly referenced in a dedicated procedure.
8. Final sign off of units and qualifications rests with the head of qualifications development, who is reliant upon the product development systems and processes being followed. However, this quality check cannot ensure that all the requirements of the QCF regulatory criteria have been met as they are not explicitly referenced.

Non-compliance

2. In the review of the *Product Development Processes and Procedures* (version 5), Edexcel must ensure that procedures are detailed and in place specifically for the development of QCF units and RoC, and that their attendant review processes are in line with regulatory requirements.

(Regulatory Arrangements for the Qualifications and Credit Framework (2008), paragraphs 3.2–3.4 and 4.2–4.4)

Observations

There are no observations in relation to this section.

Design and development of assessment

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008), paragraphs 5.3 a–g, 5.4 and 5.16a.

Findings

1. Assessment design and development forms an essential component of the BDA process. This applies to the development of all Edexcel products; general qualifications, vocationally-related qualifications and, more recently, to the development of units for the QCF.
2. When a project proposal requires a new qualification with a new assessment design, or a redevelopment of an existing qualification, a design group is established. The group is made up of a development manager, the sponsoring business manager and a representative from assessment design whose responsibility is to provide information on the most appropriate assessment models. An appropriate sector skills council (SSC) might also be involved.
3. For the production of units, task descriptor PD11 requires unit writers to contextualise unit guidance to include the appropriate assessment methods to be used. Additionally, PD17 requires that an informed consideration of possible assessment methodologies is undertaken. This includes the requirement to review any possible discriminatory issues that may be of relevance to the product being developed.
4. Guidance is provided on the writing and reviewing of units of assessment for the QCF to ensure the development of learning outcomes and assessment criteria can lend themselves to the development of relevant assessment instruments. As part of the three-stage scrutiny process, the indicated assessment methods to be used are reviewed and agreed at mid-point and final review stages of product development. Guidance is produced for centres that includes the evidence that would be expected and the methods of assessment appropriate to the qualification.
5. The above mentioned tasks, relating to the design and development of assessment, were considered against the procedural requirements stated in the *Regulatory Arrangements*, from a reconciliation and adherence perspective. The qualifications regulators formed a view that while Edexcel has dedicated processes and systems in place to develop assessment methods for individual and groups of QCF units, these were not sufficiently specific and referenced to the specific requirements of the QCF for developing assessment methods.
6. Edexcel has clear procedures in place to ensure that the grading arrangements for relevant QCF qualifications are compliant and conform to the grading

requirements set out in section 1 of the *Regulatory Arrangements*. This includes the use of a dedicated grading software programme to ensure consistency and standardisation in the setting and marking of graded examinations and assessments. Edexcel confirmed that a pass grade based exclusively on assessment criteria was used as the benchmark and that any further grades were built upon this.

Non-compliance

3. Edexcel must produce procedures for the design and development of assessment that detail how, by whom and when the most appropriate assessment arrangements for units will be decided, and it must ensure that these are consistent and compliant with the QCF Regulatory arrangements.

(Regulatory Arrangements for the Qualifications and Credit Framework (2008), paragraph 5.3)

Observations

There are no observations in relation to this section.

Delivery of assessment

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008), paragraphs 5.5–5.6, 5.9–5.10, 5.16b and 5.20–23.

Findings

1. The delivery of assessment for the range of Edexcel qualifications can be managed and conducted at both central office and assessment centre locations. As part of the design and development of assessment process, the requirements for external and/or internal assessment are normally defined through the BDA and reviewed as part of the scrutiny process. This is supported by the *Guide to Writing Units QCF/NQF* (2009) which covers the delivery and assessment issues to be considered at the time of writing QCF units.
2. The delivery of assessment at Edexcel has essentially been business as usual and the introduction of the QCF has not required any significant changes to these processes.
3. For external assessment delivered and controlled by Edexcel it has the necessary systems and procedures in place to allocate appropriate expertise, produce the required assessment instruments and tasks and provide training for those involved in the assessment process. When associates are involved in the quality assurance of internal assessment, they are subject to an organisational monitoring process designed to supervise their work and monitor their performance. This has been supplemented with additional guidance for associates to clarify the changes to the quality assurance of assessment as a result of the transition of Edexcel's NQF provision to the QCF.
4. Delivery of assessment that is delegated to recognised centres, offering assessment for awards within the QCF, is formally controlled and supported by Edexcel. Centres are provided with handbook documentation that details their roles and responsibilities in the delivery of assessment and internal verification. The monitoring team was informed that Edexcel has introduced a new method of quality assuring BTEC QCF qualifications and the centres that deliver these. This standards verification is designed to check and ensure that centres are operating quality assurance and assessing to the right standards. The new system is described more fully in the centre recognition section of this report.
5. Edexcel has produced a policy on the recognition of prior learning that gives advice and direction to staff and centres on the use of this particular method of assessment leading to the award of credit. At this time the use and application of this policy has been extremely limited, as centres have not extended the use of this method of assessment as part of the delivery of assessment.

Non-compliance

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

Observations

There are no observations in relation to this section.

Centre recognition

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008), paragraphs 5.11, 5.16b and 5.18.

Findings

1. Potential vocational centres make an initial enquiry through the Pearson work based learning unit which also guides the potential applicant through the application process.
2. The regional team within the customer services Directorate is responsible for processing the application and ensuring it meets the centre approval criteria. A final assessment of the application and centre approval sign-off is undertaken by the vocational assessment team within the qualification development assessment directorate. Both directorates reside within Edexcel.
3. Edexcel has a fast-track approval system for centres already approved by other awarding organisations. As part of its compliance process Edexcel had previously been liaising with the relevant awarding organisations to verify any sanctions against a prospective centre. The qualifications regulators were informed that Edexcel now requires sight of a recent external verifier report from other awarding organisations prior to approval.
4. Edexcel is developing a new 'streamlined' centre and qualification approval form, which it plans to introduce in 2011. The form will include centre recognition criteria, to cover BTECs, QCF NVQs and apprenticeships. On approval, the form will constitute part of the agreement between Edexcel and the centre.
5. The approval form is currently being mapped against the QCF regulatory arrangements. The regulators were provided with a draft and noted the following omissions; there is no specific mention of units (section 3, points 4.7 and 4.8), and there is no centre agreement to provide the qualifications regulators with access to premises, people and records (section 3, point 3.7)
6. The qualifications regulators were presented with internal procedures, dated December 2007, for the approval of centres and their BTEC qualifications. On examination it was noted that these are not up to date. Edexcel should consider reviewing the procedures to update and clarify the responsibilities of the different teams and directorates within Pearson Work Based Learning and Edexcel and to accommodate the new documentation being developed to meet the regulatory requirements of the QCF.

7. From September 2010 Edexcel began to implement a revised quality assurance model for monitoring the delivery of BTEC's entry to level 3 and QCF NVQs. The model builds on the previous centre risk assessment and EV processes, the principal components being:
 - the quality review and development process to support and monitor the quality of delivery in centres
 - that each centre is to nominate a single point of accountability in terms of quality
 - that within a centre, each principal subject area is to have an Edexcel accredited lead internal verifier responsible for quality assurance of assessment.
 - Standards verification to monitor the maintenance of standards of units and qualifications.
8. Under the quality review and development process centres should receive an annual visit by a centre quality reviewer who will monitor systems and report against key quality objectives. It was explained to the regulators that if serious issues are identified as an outcome of a visit there are processes in place for instigating a standards verifier visit and for blocking centre certification and registration.
9. All QCF NVQ centres and those BTEC centres deemed as high risk or where a lead internal verifier has not gained accreditation, will continue to receive monitoring visits from standards verifiers. However, this system is not yet fully developed and it is not clear what other criteria is being used to determine a high-risk centre.
10. Following the introduction of the new vocational centre and qualification approval process, and the implementation of a revised quality assurance model for centre monitoring, the effectiveness of these new arrangements should be reviewed as part of the wider Edexcel systems review process.
11. Similarly, the introduction, implementation and continued development of these new systems and processes means that the qualifications regulators are not able to make a judgement on their effectiveness at this time.

Non-compliance

4. Edexcel must ensure that its new centre approval documents fully meet the requirements of the QCF arrangements.

(Regulatory Arrangements for the Qualifications and Credit Framework (2008), paragraph 5.11c and i)

5. Edexcel must have a procedure in place for the ongoing review of its arrangements for centre approval and monitoring to ensure they are consistent with the regulatory requirements.

(Regulatory Arrangements for the Qualifications and Credit Framework (2008) paragraph 5.16b)

Observations

1. Edexcel should review and update its internal procedures for the approval of centres to reflect the new systems and processes in operation.

Awarding and certification

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (2008), paragraphs 5.12–5.15, 5.16 c–d and 5.19.

Findings

1. Edexcel has a number of electronic and manual systems whereby centres report learner results information, including the achievement of credit.
2. The regulators were informed that results information can be submitted electronically or in paper format. Electronic data is transferred from the centres management information systems directly to Edexcel's integrated qualifications system. Paper versions of the student record forms are sent to a third-party supplier who scans the forms and saves them in an electronic format. These records are then checked against the original forms to ensure the correct details have been scanned and they are then transmitted back to Edexcel.
3. Staff explained that Edexcel's integrated qualification database had extra functionality added to incorporate the credit and RoC requirements of the QCF.
4. Edexcel is able to collect and reconcile unique learner numbers with BTEC and NVQ candidate numbers, if required, and can report against previous attainment. Requests for exemptions are few and these are currently dealt with individually, although systems to deal with credit accumulation and transfer are not yet in place.
5. The integrated qualifications database incorporates automatic checks on the achievement of credit and RoC. Certificates are then printed on a weekly basis. A new credit certificate was produced that was different from the one that was presented as part of Edexcel's application for QCF recognition. This meets the design requirements for QCF credit certificates.
6. Although Edexcel's internal procedures are subject to review as part of the ISO 9001 instruction, the regulators were not made aware of any specific procedures to review credit and qualification awarding processes to ensure consistency with the QCF regulatory arrangements.
7. Standards over time are reviewed as part of a rolling programme of activity carried out by the Senior Standards Officer. The standards monitoring programme looks at all aspects of delivery, including training, reports and approvals, focusing on specific sectors. It culminates in a review of awards annual report to the Regulation, Standards and Research Director and the Qualifications Committee.

Non-compliance

6. Edexcel must make explicit in its internal review procedures the requirement for reviewing procedures for the awarding of credits.

(Regulatory Arrangements for the Qualifications and Credit Framework (2008), paragraph 5.16c)

Observations

There are no observations for this section.

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