



Awarding body monitoring report for: The National Examination Board in Occupational Safety and Health (NEBOSH)

April 2009

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Introduction

Regulating external qualifications

Responsibility for regulating external qualifications lies jointly with three regulators:

- the Office of the Qualifications and Examinations Regulator (Ofqual)
- the Department for Children, Education, Lifelong Learning and Skills (DCELLS), the body for Wales
- and the Council for the Curriculum, Examinations and Assessment (CCEA), the authority for Northern Ireland.

Following the accreditation of a qualification, the regulators systematically monitor awarding bodies 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 external qualifications.

Where an awarding body is found not to comply with relevant criteria, the regulators set conditions of accreditation. Even if an awarding body is compliant, the monitoring team may make observations on ways that the awarding body could change its systems and procedures to improve clarity or reduce bureaucracy.

Accreditation conditions and observations arising from this monitoring activity are specified at the end of each section of this report. Awarding bodies are required to produce an action plan to show how they will deal with accreditation conditions imposed as a result of a monitoring activity. The regulators will agree the action plan and monitor its implementation.

The regulators will use the outcomes of monitoring and any subsequent action taken by awarding bodies to inform decisions on the re-accreditation of qualifications, or, if necessary, the withdrawal of accreditation.

Banked documents

As part of its awarding body recognition processes the regulators require awarding bodies to submit certain documents to Ofqual for the purposes of 'banking' centrally. Information from banked documents will be used to inform monitoring activities and may also affect the awarding body's risk rating.

A suite of documents has been identified as suitable for banking and are those considered to be most crucial in supporting an awarding body's ability to operate effectively. To maintain the currency of the banked documents, awarding bodies are responsible for updating them as and

when changes occur. They are also reminded to review them at least annually at the time of completion of the self-assessment return.

About this report

The monitoring activity for the National Examination Board in Occupational Safety and Health (NEBOSH) was carried out by Ofqual on behalf of the regulators in January 2009.

This was the second monitoring activity of NEBOSH and focused on its qualifications development processes and the outcome of previous accreditation conditions. The monitoring looked at the regulatory criteria relating to the following key areas:

- corporate governance
- resources and expertise
- qualifications development
 - planning
 - design and content
- application of assessment methods
 - quality assurance and control of internal assessment
 - quality assurance and control of independent assessment
- determination and reporting of results.

The monitoring activities included, attendance at a practical examinations moderation meeting, desk research of information already held by the regulators, including the banked documents, and scrutiny of the NEBOSH website. The monitoring team visited the NEBOSH head office in Leicester to conduct interviews with staff and review documentation.

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

About NEBOSH

NEBOSH was founded in 1979 as an independent examining board and awarding body. It offers a range of vocationally related qualifications designed to meet the health and safety training needs of all places of work in both the private and public sectors. For further information on the qualifications offered by NEBOSH, please see www.nebosh.org.uk.

Corporate governance

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 5, 6 and 7.

Findings

1. Since it was last monitored in 2005, NEBOSH has undergone significant growth. The numbers of staff and the number of accredited qualifications it delivers has doubled. It has also reviewed its governance arrangements and changed the composition of its board of directors and trustees.
2. NEBOSH is a company limited by guarantee with charitable status. It is overseen by a Council made up of relevant stakeholders such as health and safety representatives, health and safety regulators, professional bodies and employer organisations. The Council appoints the Board of Directors and Trustees and the Chair of the Board. The remit of the Council is to advise on policy and the direction of NEBOSH.
3. The Board of Directors and Trustees (Board) is made up of independent trustees and/or directors and representatives from both public and private course providers. An increase in the number of directors on the Board has ensured there is no predominance of any one party. Its remit includes ensuring the organisation meets its strategic aims and remains legal and compliant. The Board is responsible for managing the affairs of NEBOSH and delegates the day-to-day responsibility to the chief executive.
4. The Chief Executive's department coordinates the work of NEBOSH as a whole. Its work centres upon servicing the Directors and Trustees, strategy, relationships and accreditation with national regulatory authorities.
5. There are formal sub-groups that report to the Board, such as those for Audit, Remuneration and Nominations. A further sub-group is the Qualifications and Technical Council (QTC). It is responsible for ensuring that the technical content and assessment design of NEBOSH qualifications is fit for purpose and meets the needs of employers. The QTC also reviews new qualifications, revisions to syllabi and reports on examination performance from the Diploma and Certificate Panels to the Board. These panels deal with reviewing assessment tasks, overseeing marking and moderation of assessments and making awarding decisions.
6. Full details of the roles and responsibilities and terms of reference of the Council and Board are set down in the *NEBOSH Governance Manual*. The monitoring team were shown

examples of minutes from the Board and the QTC that demonstrated a clear reporting structure.

7. The single point of accountability for maintaining the standards of the accredited qualifications is the Chief Executive. The job description for this post makes reference to the quality of the examinations and assessment process but does not explicitly refer to the post holder being the single point of accountability. NEBOSH should consider making this clear for the future.
8. The monitoring team reviewed the documents that NEBOSH has banked with Ofqual. They were all satisfactory in meeting the regulatory requirements with the exception of the procedure for special considerations. This procedure needs to specify NEBOSH's position on applying an aegrotat in the event of a candidate being unable to complete a qualification.

Accreditation conditions

1. NEBOSH must ensure that the special considerations policy states the minimum evidence required to make a judgement in the event of the candidate being unable to complete a qualification (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 19b).

Observations

1. NEBOSH should consider amending the job description for the Chief Executive to make it clear that the post holder is the single point of accountability for the organisation, with responsibility for maintaining the standards of accredited qualifications.

Resources and expertise

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 8 and 10.

Findings

1. NEBOSH employs approximately 42 full-time staff with some part-time and additional temporary staff being available for use at peak times.
2. Staff are subject to an appraisal system that identifies personal development and training requirements with bi-annual reviews.
3. There is an annual staff review that updates staff on the direction of business. Each team has key performance indicators (KPIs) and departmental objectives based on the overall business plan. Reports on progress towards the KPIs are made through management team meetings.
4. There are four main departments focussing on awarding body operations. The first is the Accreditation Department, which deals with the approval and monitoring of course providers. The second is the Development Department dealing with the development and/or revision of qualifications. The Standards Department deals with managing the processes of assessment including question paper setting, marking and moderating. Finally, the Operations Department deals with registration and certification of candidates, reasonable adjustment requests, etc. These together with the Chief Executive, Finance and Administration, Customer Service and International Development departments make up the organisational structure of NEBOSH.
5. Team managers meet formally on a twice monthly basis with other meetings taking place as necessary. For instance, there is a quarterly review of the operation of the quality management system that ensures continual improvement in accordance with NEBOSH's ISO 9001:2008 registration. The Board meets quarterly to review progress against the annual strategic plan.
6. In addition to its permanent staff, NEBOSH contracts with approximately 400 examiners and eight moderators. Potential examiners come from within the industry and there is a waiting list of applicants. NEBOSH holds four examiner workshops a year for level 3 and level 6 qualifications. Tests are carried out at the workshops to ascertain suitability before new examiners are assigned to a team leader. The team leader will monitor the examiners' marking and can recommend further training if necessary.

7. Examiners are contracted by session and principal examiners are contracted annually. Principal examiners are tasked with writing questions and question papers and reviewing examination reports. The roles and responsibilities for principal examiners, team leaders and examiners are laid down in the *Examiners Guide to Marking* (Draft) November 2008 and are also on the contracts.
8. NEBOSH has invested in a new IT system and is in the final stages of moving all its qualifications on to it. The system will allow better interrogation and statistical reporting. The system is backed up daily and discs taken off site. As part of its business continuity insurance requirements NEBOSH has carried out some testing to look at how it deals with data recovery.

Accreditation conditions

There are no accreditation conditions for this section.

Observations

There are no observations for this section.

Qualifications development: planning

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 1–4, 43 and 44.

Findings

1. The Development Department at NEBOSH has been set up since the previous monitoring. It deals with the development of new qualifications and reviews those that require updating. There are four internal procedures in place to support this. These are the Operations Flowchart for Development (Regulatory) Section, the process for developing new and significantly revised existing qualifications (pre-pilot stage), Pilot qualifications development process and qualifications implementation process.
2. NEBOSH currently has five qualifications accredited within the National Qualifications Framework (NQF), three at level 3 and two at level 6. NEBOSH does not currently have any qualifications in the Qualifications Credit Framework (QCF). Its qualifications are unitised but have not been assigned QCF levels or credits. NEBOSH is aware of the additional work that needs to be done should it decide to put its qualifications into the QCF.
3. Ideas for the development of a new qualification can come from a variety of sources. These could be from Council members, Sector Skills Councils (SSCs), course providers, the result of regulatory change or they may be internally generated.
4. All new ideas go to the Development Manager, who has the overall responsibility for evaluating them. Initial proposals are reviewed by the Development Manager and the Chief Executive. Their review takes into account whether the proposed qualification is relevant and fits with NEBOSH strategy. Discussions take place at the management meeting, which also looks at any potential operational implications. The Development Manager reports to the QTC and the Board.
5. Initial market scoping and consultation with course providers and other stakeholders is carried out to establish that there is sufficient demand to justify further development.
6. The Board has the responsibility for strategic approval and piloting of new qualifications. Once it has been agreed that a qualification can be developed or needs revising it is fed into the annual strategy review and placed on the business plan and on the Development Department KPIs. There are opportunities to update the annual business plan through quarterly reviews.

7. NEBOSH has procedures in place for withdrawing qualifications. Letters to course providers and candidates giving timescales for withdrawal of a qualification were seen by the monitoring team.
8. The process for planning qualifications is detailed on a flowchart in the Process for developing new and significantly revised qualifications (pre-pilot stage). Included in this document is a list of the relevant NEBOSH staff and committees involved and a summary of their role in the development process. This is good practice and will also be a requirement for the QCF accreditation process.

Accreditation conditions

There are no accreditation conditions for this section.

Observations

There are no observations for this section.

Qualifications development: content and design of qualifications

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 1, 4 and 45–55.

Findings

1. The Development Manager and the Standards Manager are responsible for the production of the draft syllabus and proposed assessment methods for a new qualification. A project lead is identified in the Development Department who will project manage the work and take it forward to consultation and piloting, in consultation with a lead Standards Officer.
2. Development (and where appropriate Standards) representatives maintain contact with SSCs and/or Standards Setting Bodies by attending meetings and sitting on panels such as those for National Occupational Standards reviews. There is an internal project plan that is used to track and monitor the progress of each qualification's development. Progress is also reviewed at bi-monthly project team meetings.
3. The Development Manager, the Qualifications Development Executive and the Standards Manager are operationally experienced health and safety practitioners who have sufficient expertise to write syllabi and determine appropriate assessment methodologies. However, for some qualifications such as those for the oil and gas industries it has been necessary to appoint external consultants to provide the relevant sector expertise.
4. A syllabus, assessment methodology and a qualifications template are produced. The qualifications template outlines the rules for the qualification delivery. The syllabus and assessment methodology are subject to stakeholder consultation usually consisting of course providers, professional bodies, etc. Should there be significant amendments to the syllabus arising from consultation it will be re-drafted and further consultation will take place.
5. The new qualification then proceeds to implementation. The QTC is informed of the intention to pilot and have approval oversight. Revised qualifications may also be piloted depending on the scale of changes.
6. Examiners are contracted, and a bank of examination questions (items) is commissioned for use in compiling examination papers. Pilot course providers are sought together with pilot tutors. There are clear criteria and guidelines for pilot course providers that outline their commitment and responsibilities to the candidates taking part. Certificate-level qualifications may be piloted for up to 12 months and diploma levels up to two years. Each pilot has a

timescale for examinations, marking and awarding, with time allowed for potential appeals. Feedback is then sought from examiners, course providers and candidates.

7. Results from ongoing consultations and pilots are evaluated by the Development Department, which produces a business case with recommendations for launch of the 'full' qualification. Not all pilot qualifications reach full qualification status. If there are concerns over the pilot NEBOSH has systems in place either to run a second pilot or withdraw it. It can also withdraw pilot providers if their performance is unsatisfactory.
8. The QTC approves the technical content of new or revised qualifications at key stages of the development process. The Board provides the final strategic approval for the qualification.
9. The process for developing and piloting new qualifications is detailed on a flowchart within the Pilot qualification development process. Also included in this document is a list of relevant NEBOSH staff and committees involved and a summary of their role in the development process.
10. For the purposes of the national qualifications framework the NEBOSH qualifications development process is fully documented, monitored and robust. The monitoring team considers that the emphasis placed on piloting is good practice in ensuring the qualification is fit for purpose before being fully implemented.

Accreditation conditions

There are no accreditation conditions for this section.

Observations

There are no observations for this section.

Application of assessment methods: the quality assurance and control of internal assessment

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, 13, 36, 56, 57 and 59–62.

Findings

1. The monitoring team looked at the quality assurance arrangements in place to support the internal assessment of vocationally related qualifications (VRQs). NEBOSH offers a range of accredited qualifications in health and safety at levels 3 and 6. The qualifications are unitised and the majority include a practical examination that is internally assessed and externally moderated.
2. The externally assessed components are available on demand or on set dates. NEBOSH expect candidates to be assessed for the practical unit within 14 days of taking the externally assessed units. The practical assessment can be in the form of an inspection or site survey carried out by the candidate followed by a written report of their findings.
3. To promote reliable assessments, the awarding body provides approved assessors and course providers with guidance. This includes the qualification specifications, the guide to marking the practical assessment and exemplar materials. However, NEBOSH is aware that there are difficulties in the consistency of practical marking.
4. In seeking to address this, NEBOSH has produced a revised mark scheme. It contains detailed descriptions on the level of performance required to be demonstrated at each mark band. Currently, only new assessors who have attended a practical assessment workshop have been given this revised mark scheme. NEBOSH staff stated that it intends to make the workshop mandatory for all assessors. NEBOSH uses external moderation to check the consistency of internal assessment decisions.
5. NEBOSH introduced new quality assurance arrangements for managing internal assessment in 2008 but these are not documented or clear. They include identifying course providers as high, medium or low risk. Course providers deemed high risk are included in the external moderation sample together with a small number of medium and low risk course providers. NEBOSH also calls in practical assessments from course providers where there is a discrepancy between the marks of the external and practical assessment or where there are new assessors.

6. The monitoring team is not confident that the results for practical assessments are reliable although NEBOSH is clearly taking steps to manage the consistency of assessment. During 2008, NEBOSH externally moderated practical assessments from about 50 course providers. The regulator considers that the sample does not match the risk associated with this type of assessment.
7. There is no clear sampling strategy showing how the awarding body moderates work from all course providers and all assessors over time. The regulators acknowledge that this is a new system but the rationale for sampling must be clearly defined. This is particularly important as there is no requirement for internal moderation within course providers.
8. Currently, moderators meet four times per year to moderate a sample of practical assessments. The Standards Officer will identify a sample of high, medium and borderline assessments to be moderated. All practical assessments from the sample are looked at if issues are identified with marking.
9. A member of the monitoring team attended one of the meetings where the revised mark scheme was used. Moderators were given a common script with a pass mark of 74 per cent. After much discussion it was reduced to 54 per cent, which is a "refer", meaning the candidate has failed to meet the pass standard for that unit. The regulator noted that it took a long time to agree the mark of the common practical assessment, therefore practical assessors may have the same difficulties unless they have been trained to use the revised mark scheme. In addition, there was a degree of inconsistency in marking across the samples. Not all course providers had sent in the practical assignments as requested. The sample covered seven course providers, with a further four arriving late. After the moderation meetings NEBOSH allocates a risk rating based on the standard of marking which is entered onto the database.
10. The regulators require candidates and course providers to confirm the authenticity of evidence presented for assessment. Candidates do not sign the observation sheet or written report for the practical assessment to confirm it is their own work.
11. NEBOSH confirmed that all moderated practical assessments are returned to course providers. Records are retained by centres for three years.
12. There are suitable arrangements for checking conflicts of interest and the monitoring of moderators. Currently, moderators are monitored by the relevant Standards Officer. A new system is due to be implemented and a principal moderator has been recruited to take on this

role. These arrangements are not formally documented as the existing arrangements are under review.

Accreditation conditions

2. NEBOSH must provide all assessors and moderators with sufficient guidance so that assessment requirements can be interpreted consistently (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 60e).
3. NEBOSH must ensure that its moderation arrangements ensure sufficient evidence to make secure decisions based on samples that include all assessors and all course providers over time (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 56).
4. NEBOSH must require candidates and course providers to confirm the authenticity of evidence presented for the practical assessment (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 57a and 60g).

Observations

2. NEBOSH should consider using postal standardisation or introduce mandatory training for all assessors to promote reliable assessment.
3. NEBOSH should consider sending the common script to all moderators prior to the meeting so that issues for discussion are identified prior to the moderation meeting.

Application of assessment methods: the quality assurance and control of independent assessment

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 13, 36, 38–42 and 56–58.

Findings

1. The monitoring team looked at the quality assurance and control systems in place to support the independent assessment of VRQs.
2. All of the accredited qualifications have externally assessed components. The main assessment methods are written examinations and assignments. The latter forms part of the level 6 qualifications. For level 3 qualifications, candidates can take 'standard' examinations on set dates or 'local' examinations on demand as agreed by each course provider with NEBOSH. For level 6 examinations only standard dates are available.
3. Candidates and course providers are given detailed information about each accredited qualification specification in a guide, for example *Guide to the NEBOSH National Diploma in Occupational Health and Safety (Level 6 – September 2006 specification)*. The guide details the assessment methods, tasks, assessment criteria and marking criteria. Guides are available in hard copy or qualification specifications can be downloaded from the website.
4. There are robust arrangements for developing and evaluating assessment tasks supported by documented procedures. For each examination session the principal examiner or contracted item writer will provide two to three new questions with answers to be included in the paper. The items are checked by the Standards Officer or Principal Examiner and accepted or rejected before being added to the relevant question bank.
5. Draft papers and mark schemes for 'standard' examinations are set by the principal examiner with input from the Standards Officer. A number of checks are carried out. These include suitable breadth and coverage of the syllabus, language and bias. Further checks by the Standards Officer include changes to legislation, which may impact on existing questions.
6. The draft papers are then sent to the Question Paper Evaluation Committee (QPEC) for comment and checking. The document *Production of question papers, Version 1 (Nov 08)* explains the full process and is very detailed. It includes the roles and responsibilities of the panel and describes the additional checks to be carried out by QPEC, the independent scrutineer and NEBOSH staff before papers are printed. All personnel involved in the QPEC process sign a confidentiality agreement and all sample papers are shredded after the

meeting. NEBOSH has adopted the code of practice for general qualifications for its paper reviews. This is good practice. The monitoring team is confident that these procedures are robust and secure.

7. Examination papers for local examinations are constructed manually from the question bank by the Principal Examiner and Standards Officer. Each paper will include questions that have been evaluated and agreed for inclusion in the bank.
8. Candidates take examinations either at a standard examination venue provided by the course provider or locally as an external candidate with another course provider. All candidates are required to produce an administration voucher with their signature. This is checked by the invigilator. Currently, NEBOSH candidates do not have to provide photographic identification although the regulators consider this to be best practice. However, the monitoring team noted that this is now a requirement in the draft procedures that are being implemented in the future.
9. NEBOSH staff carry out spot checks on examinations to check the examination and security arrangements but these checks do not extend to the practical examination for level 3 qualifications.
10. All scripts are returned to NEBOSH for marking. The awarding body has introduced a new system for marking and standardisation, which includes using principal examiners, team leaders, examiners and standardisation meetings. The monitoring team noted that the written procedures and the *Examiner's guide to marking*, Version 1, are draft and not finalised.
11. Examiners are normally expected to mark a maximum of 80 scripts for a standard sitting of a level 3 examination. Prior to the standardisation meeting team leaders and examiners mark 10 random scripts against the mark scheme. The standardisation meeting is chaired by the principal examiner. Marked scripts are reviewed and the mark scheme amended as required. During the meeting examiners mark a common script and about three additional scripts against the amended mark scheme. The additional scripts are remarked by the team leaders to check consistency. Examiners marking within the range can continue marking. If there is inconsistent marking, these scripts are re-marked by the team leaders and examiners must submit a further sample for checking. They can continue to mark but marks are not confirmed unless the team leader is satisfied with the second sample. Examiners who mark inconsistently throughout the standardisation process are not used. These scripts are remarked.

12. Principal Examiners discuss any issues on examiner performance with the team leaders. The Standards Team record the marks from each examiner and monitor their performance.
13. Local examination scripts are marked by experienced examiners. NEBOSH does not hold standardisation meetings for these examinations as all questions and mark schemes are in the relevant bank of questions and have been standardised.
14. The Standards Department and the Principal Examiners produce annual written reports for each externally assessed unit of each qualification. These include information on question papers, expected responses to questions and common errors.

Accreditation conditions

There are no accreditation conditions for this section.

Observations

4. NEBOSH may wish to consider extending its spot checks of examinations to include practical assessments.

Determination and reporting of results

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 63–67.

Findings

1. NEBOSH has suitable arrangements for awarding qualifications. The awarding body holds a number of meetings each year to confirm results for standard examinations. There are four of these meetings for Certificate-level qualifications and two for Diploma-level. There is a strict timetable for each standard examination session from the date of exam to the issuing of results. The awarding panels are supported by staff in the Standards and Operations Team who provide statistical information and organise the scripts in mark order.
2. All scripts one mark below the pass mark are remarked. The pass mark for standard examination papers is usually 45 % (60 % for level 3 practical examinations) but may vary slightly if issues are identified during the panel meetings. To obtain a full qualification, candidates must achieve a pass for each unit. Whilst units are not graded individually an overall grade may be determined by adding the marks given for each unit.
3. Results for local examinations are confirmed by the Standards Officer. To obtain the full qualification candidates must achieve a pass for each unit which is not graded. Grading is based on the overall mark across both units. The pass mark for local examinations is set at 45 per cent. This process is currently under review.
4. Any adjustments to marks are completed before the final mark and grade is confirmed. The monitoring team noted that there was clear evidence to support the checking of scripts and remarking if required before results were issued. The awarding body has suitable arrangements to adjust marks where reasonable or if special consideration is given. Requests are considered and applied where applicable prior to the panel meeting. Specific issues that cannot be addressed are referred to the panel meeting.
5. The information on pass marks for individual units and grading for each qualification are clearly set out in the relevant guide.

Accreditation conditions

There are no accreditation conditions for this section.

Observations

There are no observations for this section.