



# **Post-Accreditation Monitoring Report**

## **The Gemmological Association of Great Britain**

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## Contents

Introduction.....	3
Regulating external qualifications.....	3
Banked documents.....	3
About this report.....	4
About Gem-A .....	4
Corporate governance.....	5
Findings.....	5
Accreditation condition .....	6
Observations .....	6
Resources and expertise .....	7
Findings.....	7
Accreditation condition .....	7
Observation.....	7
Application of assessment – quality assurance and control.....	8
Findings.....	8
Accreditation conditions .....	10
Observations .....	10
Determination and reporting of results.....	11
Findings.....	11
Accreditation condition .....	11
Observation.....	11
Registration and certification .....	12
Findings.....	12
Accreditation conditions .....	13
Observations .....	13

Malpractice .....	14
Finding .....	14
Accreditation conditions .....	14
Observation .....	14
Equality of opportunity, reasonable adjustments and special consideration .....	15
Finding .....	15
Accreditation condition .....	15
Observations .....	15
Customer service statement .....	16
Finding .....	16
Accreditation condition .....	16
Observations .....	16
Enquiries and appeals .....	17
Finding .....	17
Accreditation condition .....	17
Observations .....	17
Monitoring and self-assessment .....	18
Findings .....	18
Accreditation conditions .....	18
Observations .....	18

## **Introduction**

### **Regulating external qualifications**

Responsibility for regulating external qualifications lies jointly with three regulators:

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

Following the accreditation of a qualification, the regulators systematically monitor awarding organisations 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 organisation is found not to comply with relevant criteria, the regulators set conditions of accreditation. 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.

Accreditation conditions 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 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 organisations to inform decisions on the re-accreditation of qualifications, or if necessary, the withdrawal of accreditation.

### **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 that are considered to be the most crucial in supporting an awarding organisation's ability to operate effectively. To maintain the currency of the banked documents, awarding organisations are responsible for updating them as and when changes occur. They

are also reminded to review them at least annually as part of the self-assessment return.

## **About this report**

This report is the outcome of a monitoring activity on The Gemmological Association of Great Britain (Gem-A) awarding organisation and was carried out by Ofqual on behalf of the regulators in April 2009. This is the second post-accreditation monitoring activity on Gem-A's activities.

The monitoring focused on the regulatory criteria relating to the following key areas:

- corporate governance
- resources and expertise
- application of assessment methods – quality assurance and control
- determination and reporting of results
- registration and certification
- malpractice
- equality of opportunity, reasonable adjustments and special consideration
- customer service statement
- enquiries and appeals
- monitoring and self-assessment

The monitoring activities included desk research of information already held by the regulators, the self-assessment return and scrutiny of the Gem-A website. The monitoring team visited Gem-A's head office to conduct interviews with staff and review documentation.

## **About Gem-A**

Gem-A, which began as the Gemmological Committee of the National Association of Goldsmiths, first introduced a gemmology qualification in 1908 in order to encourage jewellers to understand the gems that they were selling and to identify fakes. For more information on Gem-A and the qualifications it offers, visit the Gem-A website at [www.gem-a.com](http://www.gem-a.com).

## **Corporate governance**

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (QCA/04/1293)*, paragraphs 5, 6 and 7.

### **Findings**

1. The regulators discovered at the end of 2008 that the single named point of accountability at that time was not available due to prolonged illness. The knowledge this person had was the key to the running of the awarding organisation. A temporary resource was being obtained to remedy the situation. The regulators agreed that the best way forward would be for Gem-A to prepare for and undergo a full audit in order to make sure that any gaps were rapidly identified and remedied.
2. The awarding organisation had relied on one individual having all the expertise. Gem-A has set about the business of ensuring better continuity by involving more of its staff in the running of the organisation. Job descriptions have been rewritten.
3. Gem-A has set up a new committee, the Awarding Body Review Panel, to control the awarding organisation. Membership consists of the chief executive, the director of education and the awarding organisation administrator. The committee is so new that it is impossible to express an audit opinion on the robustness of the awarding organisation's governance. The terms of reference of the awarding organisation's committees should be set out in greater detail.
4. The regulators acknowledge that the information on the long-term absence of the single named point of accountability was not deliberately withheld from them. Gem-A should ensure that the absence of a single person does not significantly affect its awarding organisation functions in future. The regulators are confident that this awareness is now in place, but have included an observation in this report as a reminder to the awarding organisation.
5. The Gemmological Association of Great Britain is a small organisation, but carries out a large number of activities, some of which are potential conflicts of interest for anyone working for the awarding organisation side. For example, the director of education has many potential conflicts of interest to contend with. The current holder of this office acts as a tutor for Gem-A's qualifications, edits some of the examination papers, liaises with examiners and sits on the committee that signs-off the qualifications.
6. The regulators were not satisfied that there is a clear distinction between the awarding organisation function and other functions within the organisation to manage any potential for conflict of interest. However, Gem-A has remedied a

number of unsatisfactory situations since 2008 and is implementing further change.

7. Gem-A provided access to people and documents and cooperated fully throughout the central systems monitoring.
8. The regulators discussed, in confidence, Gem-A's policy and arrangements for setting fees and were satisfied with the information provided.

### **Accreditation condition**

1. Gem-A must create a clear distinction between the awarding organisation function and its other activities as a training provider. It must address potential conflicts of interest within the organisation's staff duties (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 5d).

### **Observations**

1. Gem-A should strengthen and amplify the terms of reference of its committees.
2. Gem-A should ensure that it informs the regulators immediately of any proposed change in the senior leadership or governance of the awarding organisation.

## Resources and expertise

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 8 and 10.

### Findings

1. The regulators recognised that considerable reorganisation of duties had taken place recently. It was therefore difficult to evaluate the adequacy of the awarding organisation's resources until people had had a chance to adapt to their new roles, and write the documentation and internal procedures that were required.
2. New computer aids were either being implemented or due, and if successful, the awarding organisation's performance will be improved. Like all awarding organisations, it is not clear how the current economic recession will affect its business across the world.
3. The regulators were satisfied that the current staff had the requisite expertise.
4. The awarding organisation is involved in writing qualifications for the new Qualifications and Credit Framework (QCF) and this will inevitably impose pressure on its resources for some time.
5. The regulators noted that the awarding organisation offered its qualifications' assessment in several languages other than English: French, Korean, Chinese, Japanese, Italian, Finnish and Swedish. For most of the languages, there are two translators for each examination, one to translate and the other to verify any discrepancies or difficulties caused by mistranslation. They enter into dialogue with the examiner, if necessary, before the translated examination goes to print.
6. The regulators noted that for Italian, Finnish and Swedish, such checks were not in place. This had the potential to disadvantage candidates who sit examinations in these languages.

### Accreditation condition

2. Gem-A must ensure that it has sufficient resources, or has access to resources, that formally support the multiplicity of languages used in assessment, especially for Italian, Finnish and Swedish (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 10).

### Observation

3. Gem-A should ensure that it evaluates the resources it requires after its initial reorganisation has been bedded in.



## **Application of assessment – quality assurance and control**

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 13, 36, 38–42 and 56–62.

### **Findings**

1. Gem-A has three accredited qualifications but does not use the accredited titles in its literature, which could possibly cause confusion to its candidates:
  - Gem-A level 5 Diploma in gemmology
  - Gem-A level 4 gem diamond Diploma
  - Gem-A level 3 Certificate in gemmology.
2. Gem-A retains sufficient evidence of its candidates' work or assessment decisions to monitor provision over time. All papers are kept for a year and electronic records of assessment decisions are kept permanently.
3. The awarding organisation relies on its moderators operating a self-assessment process to avoid assessing work from any venues where they may have a potential conflict of interest. The awarding organisation must take full control of this, ensure its moderators declare any such potential conflicts of interest, and have a system for using the information that is held.
4. Assessment of qualifications takes place as follows:
  - two written examinations and a practical for level 5
  - a written examination, a practical and an 'endorsement' for level 4
  - two combination practical and written examinations, and four multiple-choice/short-answer, computerised, open-book tests and an 'endorsement' for the level 3.
5. The endorsement is an attestation by an approved moderator that the candidate has used the tools of the trade sufficiently to be competent in a number of contexts.
6. Endorsements for the level 3 qualification were already in place and moderation guidelines were available. However, this had not yet been implemented for the level 4 and 5 qualifications and the guidelines for moderators were under review.

7. The regulators learned that the multiple-choice/short-answer papers were computer marked and contributed 20 per cent of the marks. Moderation by the tutor at the centre or distance learning provider was required. This was because the computer could not recognise all the ways in which a candidate might write or phrase answers to short-answer questions.
8. The tutor could not use the mark scheme in its entirety since the computer only showed a single answer. For some questions, there may be multiple correct answers. The awarding organisation recognised this as a system weakness and the director of education moderated a sample of papers. There was no written guidance as to what constituted an appropriate sample for those involved in moderation.
9. Gem-A takes reasonable steps to identify its candidates and ensure their work is authentic. However, the level 3 computerised tests can be taken off-site therefore with no guarantee that the work is that of the candidate. The assessments are open-book, however, and suffer the same weakness as 'coursework'. Therefore, the regulators have recorded an observation against this matter.
10. The basics of setting the examinations in English, with associated mark schemes and independent review, meet the regulatory requirements. Security procedures are clearly set out, including invigilation procedures, but there is no follow-up work done by the awarding organisation on a planned basis to ensure that these procedures are followed by its centres.
11. Centres are not allowed to set their own assessments. These are all set by the awarding organisation. Centres are provided with a 'how to' guide for internal moderation.
12. Given the number of certifications and candidates, the number of examiners used is high, but this is caused partly by the number of languages that are being used.
13. The awarding organisation does not produce reports on the work of each external moderator.
14. Moderators receive no feedback on the accuracy and consistency of assessments. There are no written procedures for ensuring that work is reassessed where external moderation indicates inconsistency of assessment decisions.
15. As mentioned earlier in this report in the section 'Resources and expertise', the awarding organisation allows assessment in a large number of languages other than English. Gem-A did not consider that lack of proficiency in English

prevented the candidate from properly carrying out the role that is supported by the qualification.

### **Accreditation conditions**

3. Gem-A must create a formal procedure that ensures examiners and moderators do not assess work from venues in which they have a personal interest, or where this is impossible to avoid, Gem-A arranges for such assessment decisions to be scrutinised (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 58h and 61e).
4. Gem-A must:
  - provide a more detailed explanation of how endorsements are moderated and demonstrate its operation (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 59)
  - take steps to ensure that internal assessment is carried out in the same way across centres by providing a full mark scheme for its computerised tests (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 59).
5. Gem-A must produce reports on each external moderator (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 61f).
6. Gem-A must provide feedback to its moderators on the accuracy of their assessment decisions and ensure that the identification of inconsistent assessment leads to all relevant work being reassessed by the awarding organisation (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 61g and 61h).

### **Observations**

4. Gem-A should use the accredited titles for its qualifications to avoid confusing candidates.
5. Gem-A should improve the way in which authenticity of the evidence provided by all candidates is confirmed for the computerised tests taken off-site.
6. Gem-A should introduce inspection visits to its centres or some other means of checking compliance by its centres with its regulations.

## Determination and reporting of results

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 63–67.

### Findings

1. Not all candidates achieve the level 3 in the same way. Some candidates achieve it as outlined in the previous section on ‘Application of assessment – quality assurance and control’. All require the endorsement, but some only sit written papers (that are extended) and do not sit the four multiple-choice/short-answer, computerised, open-book tests. Only English language candidates do the computerised tests. The regulators understand that this is because of the difficulties in dealing with multiple languages for assessment.
2. The guidance to centres and candidates is therefore out of date.
3. Gem-A exercises care over the day-to-day activities of determining and reporting results. Its staff would require more technical and professional support if the volumes of candidates were to increase.

### Accreditation condition

7. Gem-A must confirm and explain how, for qualifications with the same title, there is comparability and standardisation of achievement when there are different types of assessment methods for different candidates. It must map the two situations to show that they are comparable (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 63 and 65).

### Observation

7. Gem-A should keep under review the need to support its staff on awarding decisions with technology and expertise.

## Registration and certification

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 11–12 and 21–22.

### Findings

1. Gem-A has not considered its centres to be anything other than training and examination venues. In view of the 'endorsements' required of candidates' practical skills and the marking of the short-answer questions by approved centre staff, the regulators could not accept this view. Gem-A must introduce the centre registration and approval requirements to its systems.
2. The regulators noted that the examination entry form for June 2009 had a number of explanatory notes, but they were not linked always to the correct parts of the form (for example notes 9 and 10).
3. Gem-A did not record any details of its candidates other than their name and contact details. This meant that Gem-A could not comply with any request for data on its candidates from the regulators. Reference to the *NVQ code of practice* (QCA/06/2888) will assist the awarding organisation on what might be collected although the regulator is aware that candidates are not obliged to provide this information.
4. Because Gem-A does not always appear to offer qualifications to non-English speakers in the same way as to English speakers (see the previous two sections of this report), certificates should not be issued in these circumstances with the accredited titles of the qualifications and the regulators' logos until mapping of the methods has shown comparability to the satisfaction of the regulators.
5. Gem-A does not make it clear to users that the qualification is accredited only for England, Wales and Northern Ireland.
6. Gem-A's certificates are not entirely in line with the regulatory criteria requirements. For example, unit certificates must state that the unit forms part of an accredited qualification.
7. Gem-A needs to write internal procedures for some of its operations and should review the adequacy of its existing guidance for the issue of full, unit and replacement certificates to ensure it has effective safeguards against mistaken certification.

## Accreditation conditions

8. Gem-A must introduce the centre registration and approval requirements to its systems (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 11).
9. Gem-A must ask for more information from its candidates in order to be able to meet data requirements (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 12).
10. Gem-A must confirm that it only awards certificates for accredited qualifications outside of England, Wales and Northern Ireland and with the regulators' logos where:
  - the qualifications are offered to the exact specification (including assessment) accredited for use in England, Wales and Northern Ireland (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 21)
  - the awarding organisation informs its clients that the qualification is accredited only for England, Wales and Northern Ireland (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 21).
11. Gem-A must ensure that the design of certificates meets the regulators' requirements (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 22).

## Observations

8. Gem-A should revise its candidate registration documentation.
9. Gem-A should review the adequacy of its internal procedures, particularly in respect of certificate issue.

## **Malpractice**

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 28–31.

### **Finding**

1. Gem-A's procedures on dealing with malpractice had been recently revised and met the regulators' criteria. It was too soon for the records associated with the new procedures to be auditable.

### **Accreditation conditions**

There are no accreditation conditions for this section.

### **Observation**

10. Gem-A should ensure that the procedures outlined in its new malpractice policy are followed since it is a new document for the organisation.

## **Equality of opportunity, reasonable adjustments and special consideration**

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 9 and 14–20.

### **Finding**

1. Gem-A's procedures on dealing with equality of opportunity, reasonable adjustments and special consideration had been recently revised and met the regulators' criteria. It was too soon for the records associated with the new procedures to be auditable. However, there were no procedures in place internally to ensure that monitoring and evaluation took place. These must be implemented and supervised until embedded within the organisation.

### **Accreditation condition**

12. Gem-A must have procedures in place to monitor and evaluate the use of reasonable adjustments and special consideration (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 20).

### **Observations**

There are no observations for this section.



## **Customer service statement**

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 32 and 33b.

### **Finding**

1. Gem-A's customer service statement had been recently revised and met the regulators' criteria. It was too soon for the records associated with the new document to be auditable. However, there were no procedures in place internally to ensure that monitoring took place. These must be implemented and supervised until embedded within the organisation.

### **Accreditation condition**

13. Gem-A must have procedures in place to monitor its performance against customer service targets (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 33b).

### **Observations**

There are no observations for this section.

## **Enquiries and appeals**

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 23–27.

### **Finding**

1. Gem-A's enquiries and appeals procedure had been recently revised and met the regulators' criteria. It was too soon for the records associated with the new document to be auditable. However, there were no procedures in place internally to monitor, evaluate and report annually on the operation of its enquiries and appeals, including the number and nature of them and their outcomes. These procedures must be implemented and supervised until embedded within the organisation.

### **Accreditation condition**

14. Gem-A must have procedures in place for monitoring, evaluating and reporting annually on the operation of its enquiry services and appeals arrangements, including the number and nature of enquiries and appeals, and their outcomes (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 27).

### **Observations**

There are no observations for this section.

## **Monitoring and self-assessment**

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 33a, 34–35 and 37.

### **Findings**

1. Gem-A had submitted a self-assessment report to the regulators.
2. It was clear that feedback from candidates and employers was encouraged in Gem-A's documentation.
3. Gem-A cooperated fully with the regulators during its central systems monitoring, providing ready access to people, systems and documentation.
4. Gem-A needs to write down the procedure it used for creating its self-assessment report or some other means of guaranteeing that it monitors on a regular basis its compliance with the regulators' criteria.

### **Accreditation conditions**

15. Gem-A must have procedures in place to monitor its compliance with the regulators' criteria (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 33a).

### **Observations**

There are no observations for this section.

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