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Post-Recognition Monitoring Report

**The Counselling and Psychotherapy Central Awarding
Body**

April 2011

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Introduction

Regulating qualifications

The responsibility for regulating qualifications lies jointly with three regulators:

- Office of Qualifications and Examinations Regulation (Ofqual), the regulator for qualifications awarded in England and vocational qualifications awarded in Northern Ireland
- Department for Children, Education, Lifelong Learning and Skills (DCELLS), the regulator for Wales
- Council for the Curriculum, Examinations and Assessment (CCEA), the regulator responsible for qualifications (other than vocational qualifications) awarded in Northern Ireland.

We systematically monitor awarding organisations and their regulated qualifications against the requirements set out in the statutory regulations. The aim of this activity is to promote continuing improvement and public confidence in the quality of regulated qualifications.

Where an awarding organisation is found not to comply with relevant criteria, the regulators will identify areas of non-compliance that must be rectified within a certain period. Even if an awarding organisation is compliant, the monitoring team may 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 the Counselling and Psychotherapy Central Awarding Body (CPCAB) that was carried out by Ofqual between March 2011 and April 2011. It draws together the regulator's findings in the 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 CPCAB in respect of the Qualifications and Credit Framework (QCF) since the awarding organisation received supplementary recognition in 2010.

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

This report draws together our findings from these monitoring activities.

About CPCAB

CPCAB is a specialist awarding organisation run by professional counsellors for counsellors. It was formed in 1993 and offers its qualifications throughout the UK and overseas. For more information on CPCAB, visit its website at www.cpcab.co.uk .

Management and governance

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 2.1–2.3, 5.1 and 5.17.

Findings

1. CPCAB is a private limited company and has taken advantage of the exemption from the provisions of the Companies Act 2006, relating to the audit of its financial statements. CPCAB provided us with the latest accounts, and we also had sight of the ultimate parent company's (Counselling Psychology Services Ltd) accounts. Both sets of accounts were for the year ending 31st March 2010.
2. One of CPCAB's two directors is the chief executive officer and the single, named point of accountability for the awarding organisation. CPCAB provided us with an organisation chart together with relevant job and person specifications. Reporting to the chief executive officer are the head of qualifications, the business manager and the director of qualifications development. Individual responsibilities and reporting arrangements were clear. However, CPCAB might consider adding the chief executive's responsibility for the quality of the regulated functions to the role's job description.
3. We looked at the terms of reference and the minutes of several relevant committees and were satisfied with their content. We noted that committee responsibilities had changed recently with the disbanding of the accredited qualifications development team, which had handled the change from National Qualifications Framework (NQF) qualifications to QCF units and qualifications. In future, unit and qualification development will be handled by the qualifications development and approvals committee.
4. The qualification service committee is responsible for monitoring the standard of CPCAB's qualifications and oversees the operations of the qualification service.
5. The qualification service committee and the qualifications development and approvals committee report to the executive committee through the strategic management team. The executive committee and Strategic management team set the qualifications strategy and supervise the operational committees.
6. We considered that the reports of the head of qualifications to the executive were comprehensive and very clear. We thought similarly about the reports from the director of qualifications development and the business manager. Reports to the executive were examples of good practice.

7. Similarly, we considered the self-assessment report and current action plan (September 2010 – August 2011) that we looked at to be examples of good practice because of their focus on compliance with the regulatory criteria.
8. In a relatively small awarding organisation, with good channels of communication among staff, it is common for formal reporting to be less thorough because of the assumption that people are aware of the issues. This makes external audit difficult. Clearly, CPCAB has good channels of communication but augments these with thorough and clear internal recording.
9. We discussed the activities of the group of companies that CPCAB belongs to but no potential conflicts of interest were found.
10. CPCAB provided us, in confidence, with details of its policy on fees. We were satisfied with the information provided. Details of CPCAB's fees are published on its website.

Non-compliance

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

Observations

1. CPCAB should consider adding the chief executive's responsibility for the quality of the regulated functions to the role's job description.

Resources and expertise

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

Findings

1. As the accounts of CPCAB were unaudited the accountants did not express an audit opinion on them. We were told that 50 per cent of income is deferred for a year as a safeguard to ensure that the awarding organisation has sufficient funds to support current and future demands for its services.
2. CPCAB has a small workforce of approximately 12 permanent members of staff. The need for staff is reviewed periodically on an ad hoc basis. There is no formal review but a business case has to be made for appointing or changing the emphasis of jobs. Business cases are signed off by the Strategic Management Team. This process was evidenced in minutes, and we saw specific examples (such as that of a full-time web developer) that had been recorded in the risk-assessment file.
3. We received information on the technical resources and back-up procedures used for CPCAB's IT services and equipment. Some of the services are hosted externally, such as online candidate registration. Internal system data is backed up on an incremental daily basis and then a full backup is done weekly. A disaster-recovery plan is in place.
4. CPCAB has subject expertise because many of its staff members are practitioners in counselling and psychotherapy. Similarly, staff members have expertise in assessment and awarding from work they have carried out as counselling tutors, assessors and verifiers for CPCAB and other awarding organisations, including the Open University. Some staff members have worked with the open college network and so have experience of writing units.
5. In addition, staff members have attended briefing and training events on the QCF in the national workshops provided by what is now the Qualifications and Curriculum Development Agency (QCDA), which included information on RoC. One member of staff was involved in the development of Federation of Awarding Bodies' training for the QCF. The senior management team reviews staff training needs, and ensures that in-house expertise is cascaded where appropriate.
6. CPCAB ensures that centres' assessment and awarding expertise is examined by means of staff CVs. All centres receive assessment guides, and tutor and

external assessor training is provided. CPCAB's external verifiers are similarly provided with guidance and undertake two training events per year.

7. Centres' work is moderated and risk-assessed. Roles in the process are clearly defined and centre visits confirmed that these roles are understood. Publications such as the *Complete Guide to External Assessment* and the *Internal Assessment Guide* are available to staff for reference.

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*, (August 2008), paragraphs 2.11–2.14.

Findings

1. The Head of Qualifications is responsible for ensuring that CPCAB complies with current equality legislation. The head of qualifications convenes a subgroup annually, which reviews how the awarding organisation continues to comply with diversity and equality legislation. Evidence of this was presented to us within CPCAB's self-assessment document. This document demonstrated how CPCAB ensures that it considers all aspects of diversity and equality in relation to its regulatory functions.
2. CPCAB provided details of the systems it has in place to ensure equality for all learners. We were shown appendix 2 of the Application for Centre recognition and additional qualifications which assists all potential learners to access the qualifications offered by CPCAB.
3. CPCAB provided an example of how a qualification was customised for a particular group of learners (Counselling for Islamic Groups).
4. Currently, all the units that CPCAB offers have been developed with sector skills council support and in collaboration with other interested parties – including tutors and learners – when migrating NQF qualifications to the QCF. No new units have been developed since this initial exercise. We were not, therefore, able to test the process by which CPCAB would consult with relevant learners and/or their representatives when developing new units. However, we could see that they had a procedure for doing so.
5. We were given a live demonstration of the IT system that CPCAB uses to collect data. Initial data is captured when a learner completes a registration form. Centres then upload the data from the form. The details on equality and diversity are available via the IT portal to CPCAB. CPCAB has used this data to initiate further research into learners and issues around diversity and equality.
6. We were satisfied that CPCAB and its centres are aware of their responsibilities in respect of diversity and equality, and that they are active in addressing the issues.

Non-compliance

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

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* (August 2008), paragraphs 3.2–3.4 and 4.2–4.4.

Findings

1. No new units or RoC had been developed since our audit of unit development in November 2010. As the November report indicated, no units or rules of combination had been developed except for the migration of NQF qualifications into the QCF. We noted, as best practice, that there was already an action plan devoted to the findings of our earlier audit (the action plan from the visit of 8th November 2010).
2. CPCAB provided us with a copy of their document entitled *Framework for the Development and Review of QCF Units and Qualifications 2010/2011*, which is comprehensive. It details staff resource and training requirements, as well as the process to be followed to develop units and rules of combination. The process covers interrogation of the QCF unit databank, identification of need and a clear sign-off procedure. It also includes ways to engage stakeholders and consideration of diversity and equality legislation. The document is complemented by a number of individual 'sub-processes' and checklists.
3. The *Framework for the Development and Review of QCF Units and Qualifications 2010/2011* requires an annual review of each unit and RoC. This requirement was repeated in the arrangements for self-assessment (*Procedures to Ensure Ongoing Compliance with Regulatory Arrangements*). Examination of the minutes of the Qualifications Development and Approval committee meetings in March showed that unit review had already taken place, with levels being discussed.
4. The processes outlined by CPCAB in the *Framework for the Development and Review of QCF Units and Qualifications 2010/2011* meet the regulatory requirements.

Non-compliance

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

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* (August 2008), paragraphs 5.3 and 5.16a.

Findings

1. We were provided with copies of the following documents:
 - *Framework for the Development and Review of QCF Units and Qualifications 2010/2011.*
 - *Framework for the Qualification Service 2010/2011.*
 - *Complete Guide to External Assessment* (re Level 4 Diploma in Therapeutic Counselling).
 - *Guidance to Writing External Assessment – Case Review*

We noted that the section indexed as 4 in the banked document *Framework for the Development and Review of QCF Units and Qualifications 2010/2011* was missing. This section included a sub-section on the design and development of assessment and grading. We confirmed that none of CPCAB's qualifications is graded.

2. Despite the absence of section 4 in the banked document *Framework for the Development and Review of QCF Units and Qualifications 2010/2011* (due to an omission as documents were updated and banked), we had sufficient information from our conversations with CPCAB – and through other documents, particularly *Unit and Qualification Assessment Arrangements* – to form an opinion.
3. *Unit and Qualification Assessment Arrangements* clearly required units to be capable of being assessed individually. Procedures are also in place to ensure that the skills, knowledge and/or understanding of all the learning outcomes are assessed validly and that sufficient evidence is produced for reliable and consistent judgements to be made.
4. Care is taken to minimise the need for subsequent, reasonable adjustments. CPCAB gave an example with supporting evidence: when it was noticed that deaf candidates were not progressing to the diploma, rather than just creating an audio tape, the awarding organisation created a video with subtitles.
5. Methods of assessment are numerous although the majority of learners are assessed from coursework and/or a portfolio of evidence. The core counsellor

practitioner training route qualifications also have a separate external assessment for each candidate, which is marked independently by CPCAB. There is no centre-devised assessment as such, but internal assessment of material produced by the awarding organisation is thoroughly controlled by a method of external verification. The DVDs, which CPCAB produces as assessment material to be used by centres, are scripted in-house. These are checked by two people drawn from the qualification leader, the head of qualifications and the chief executive.

6. There are clear sign-off arrangements for the design and development of assessment, which are evidenced on the checklist to be used.
7. The design of assessment is reviewed as part of the annual self-assessment, and is supplemented by standardisation, training events and monitoring of centre activity. Qualification leaders write reports after each assessment cycle, which include statistics on achievement. Course tutors are asked for written feedback and learners give feedback via the external verifier's report.
8. We noticed that the checklist used for assessment design did not include a clear reference to assessment being manageable and cost effective, although the requirement was set out in the procedure. CPCAB should consider updating its documents, particularly the checklist and the *Framework for the Development and Review of QCF Units and Qualifications 2010/2011*.

Non-compliance

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

Observations

2. CPCAB should consider updating its documents, particularly the checklist and the *Framework for the Development and Review of QCF Units and Qualifications 2010/2011*.

Delivery of assessment

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

Findings

1. The assessment methodologies used by CPCAB are:

- coursework
- portfolio of evidence
- practical demonstration/assignment
- practical examination
- written examination.

The majority of qualifications have coursework and/or a portfolio of evidence, in addition to a separate, external assessment (written examination), as their method of assessment. Centres do not design their own assessments. Most of CPCAB's qualifications are single-unit qualifications.

2. Systems are in place to ensure appropriate levels of expertise within the delivery system and on-going support of those involved. External verifiers visit recognised centres and each verifier submits a report on the quality of internal assessment to the awarding organisation's principal verifier. The system follows the pattern of NVQ assessment, with the external verifier looking at the quality of internal verification as well as assessment standards, authenticity of work and so on.
3. CPCAB also employs a team of external assessors and moderators at each level to mark the written examinations for each candidate registered on qualifications that make up the core progression route to becoming a counsellor. These assessors and moderators are recruited according to set criteria, and trained and standardised before each assessment cycle. They also provide written feedback to CPCAB and centres as part of their role. The qualification leaders are responsible for the implementation and standards of external assessment.
4. The principal verifier quality assures the external verifier's reports and reports to the Head of Qualifications. We saw job and person specifications for all these roles, and we examined a sample of staff CVs to ensure that staff were occupationally competent. Guidance documents are provided for the main

functions, for example tutor guides for all assessors and centres, which include information on tutors' duties in relation to assessments and training opportunities in respect of the particular qualification they are delivering.

5. Considerable reliance is placed upon the training days run for centres' assessors. The standardisation exercises run at these events contribute to the evaluation of each assessor, complementing the external verifier's report on their work.
6. We received a copy of *CPCAB Archiving Policy*. We looked at CPCAB's archiving arrangements and were satisfied.
7. Reference is made to recognition of prior learning (RPL) in the information sent to centres regarding registration of candidates. The process is entirely devolved to centres with the external verifiers policing its application. We thought that information on RPL, and also possible exemptions, could feature more prominently, for example in information to learners.
8. Systems are in place to ensure potential conflicts of interest within assessment delivery are appropriately managed. The main line of defence is through external verification of centres. The external assessors, moderators, external verifiers and CPCAB core staff have to submit an annual return of potential conflicts of interest. These are kept on file centrally, and the qualification leaders are responsible for managing conflicts of interest.
9. The delivery of assessment is reviewed in an annual report which pulls together the results of a number of activities. These include the annual self-assessment report, external verification reports and the qualification leaders' reports. The summary goes to both the Qualification Service committee and the Executive committee.

Non-compliance

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

Observations

3. The information that CPCAB gives to learners and centres should be reviewed to make clear the process for RPL and exemptions, and ensure that claims for RPL or exemptions, are properly considered and recorded.

Centre recognition

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

Findings

1. CPCAB has a robust process for centre recognition. This includes a comprehensive application form which sets out the requirements for approval. The application form covers a number of specific areas: contact details; qualification/units planned for delivery; proposed tutor team; course design and contents; declaration of meeting CPCAB requirements; and supporting documents.
2. The application form also asks centres to confirm that, in relation to the safety and confidentiality of clients, they will adhere to the ethical framework of the British Association of Counselling and Psychotherapy (BACP), the professional body for counsellors.
3. By signing the application, the centre agrees to have:
 - a designated person in place responsible for quality assurance
 - administrative systems in place to track the progress of learners towards their target qualification
 - arrangements in place that allow for, and follow guidance on, RPL, credits and exemptions.

CPCAB's centres also agree to provide CPCAB, and the qualifications regulators, access to their premises, staff and records, and to cooperate with CPCAB's monitoring activities.

4. On receipt of the completed application form, and after checking the requested documentation (for example, staff CVs), CPCAB grants the applicant centre approval to deliver a specific qualification. This approval is subject to a satisfactory external verification visit. If the report after this visit is satisfactory, the centre is awarded an annual practising certificate in recognition that the centre has met all the centre and course-specific requirements. This certificate is automatically renewed unless a subsequent external verifier report identifies significant problems.
5. New centres are given an induction visit by a counselling professional during their first term of operation. During the visit they will be reminded of all matters related to delivery of CPCAB units/qualifications and CPCAB requirements.

6. CPCAB uses an online system to collect and retain information about its centres and learners. If necessary, it can obtain unique learner numbers on behalf of its centres' learners. Centres can access records of their own registered candidates at the awarding organisation. Centres can enter internal assessment results using their allocated username and password to transmit these safely and securely.

Non-compliance

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

Observations

There are no observations in relation to this section.

Awarding and certification

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

Findings

1. The candidate registration system is a secure link between CPCAB and its centres. Centres use a username and password to access their area of the CPCAB site, where they can register their candidates electronically. If the system fails, there is a back-up facility available, where CPCAB can input the paper-based information from the centre.
2. Results are input to the system both by the awarding organisation and, if appropriate, by the centre, depending on the method of assessment. The computer is programmed to recognise when a candidate has achieved the qualification. It is not capable of handling exemptions, recognition of prior learning or unit certification without manual intervention.
3. CPCAB holds an awards meeting to ensure that results are correct before certification occurs. It looks at the statistics relating to achievement and other factors to ensure that standards are comparable year on year and across centres and so on.
4. Where candidates have achieved units but not the whole qualification, centres can request credit certificates on their behalf using form CR7, which is available on the CPCAB website. Individual claims go to the Qualification Leader to be approved after the work has been moderated. This is currently a completely separate procedure to the qualification-certificate issuing process.
5. Certificates are stored securely, individually numbered and a log is kept of when each certificate is issued. For security only two people at CPCAB are authorised to access and print out certificates.
6. Certificates are issued within 20 days of the date they have been claimed. Once printed, certificates are sent to the centre together with a certification list and covering letter for distribution to the candidates.
7. The design of CPCAB's certificates meets the regulatory requirements and replacement certificates are clearly marked. CPCAB is aware of the dangers of, and has procedures to prevent, the incorrect issue of certificates.
8. The proposed central system for keeping the learners' achievements recorded has not yet been provided, so CPCAB cannot record or amend anything on it or withdraw anything from it. Once the scheme is launched, CPCAB will need

systems for recording exemptions and also for achievements with other awarding organisations when shared units become available.

9. CPCAB's procedures include regular reviews of its awarding activities.
10. CPCAB's system for the award and certification of credit and qualifications meets all of the regulatory criteria, but we thought that there were some of aspects that could be improved. We acknowledge that, currently, the numbers are small, and there is no problem for CPCAB handling things as it does.
11. However, the failure to automate the production of credit certificates in a unit-based system complicates the production of certificates by having two separate systems for one basic activity. In addition, the inability to handle recognition of prior learning, exemptions and unit achievement at other awarding organisations may not be a current, real problem but may become one in future as the QCF develops elsewhere.

Non-compliance

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

Observations

4. CPCAB should consider bringing its production of unit certificates into the same system as that for qualification certificates when it carries out its next IT upgrade.
5. CPCAB should consider creating the ability to handle requests for recognition of prior learning, exemptions and achievement at other awarding organisations into its certification system when it carries out its next IT upgrade.

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Any enquiries regarding this document/publication should be sent to us at:

Office of Qualifications and Examinations Regulation	
Spring Place	2nd Floor
Coventry Business Park	Glendinning House
Herald Avenue	6 Murray Street
Coventry CV5 6UB	Belfast BT1 6DN

Telephone 0300 303 3344

Textphone 0300 303 3345

Helpline 0300 303 3346