



Post-Recognition Monitoring Report: Lifetime

February 2011

Ofqual/11/4872

Contents

Introduction	4
Regulating qualifications	4
Banked documents	4
About this report.....	5
About Lifetime Awarding	6
Management and governance	7
Findings	7
Non-compliance	8
Observations.....	9
Resources and expertise	10
Findings	10
Non-compliance	11
Observations.....	11
Self-evaluation and continuous improvement.....	12
Findings	12
Non-compliance	12
Observations.....	12
Diversity and equality	13
Findings	13
Non-compliance	13
Observations.....	14
Development of units and RoC for qualifications	15
Findings	15

Non-compliance	16
Observations.....	16
Design and development of assessment.....	17
Findings	17
Non-compliance	18
Observations.....	18
Delivery of assessment	19
Findings	19
Non-compliance	20
Observations.....	21
Centre recognition	22
Findings	22
Non-compliance	22
Observations.....	23
Awarding and certification	24
Findings	24
Non-compliance	25
Observations.....	25
Malpractice	26
Findings	26
Non-compliance	26
Observations.....	26
Reasonable adjustments and special consideration.....	27
Findings	27
Non-compliance	27

Observations.....	28
Appeals	29
Findings	29
Non-compliance	29
Observations.....	30
Customer service.....	31
Findings	31
Non-compliance	31
Observations.....	31

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-compliances and observations arising from this monitoring activity are specified at the end of each section of this report. Awarding organisations are required to produce an action plan to show how they will deal with 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 Lifetime Awarding that was carried out by us in February 2011. It draws together our findings in the areas of:

- management and governance
- resources and expertise
- self-evaluation and continuous improvement
- diversity and equality
- development of units and rules of combination (RoC) for qualifications
- design and development of assessment (unit/qualifications development)
- delivery of assessment
- centre recognition
- awarding and certification
- malpractice
- reasonable adjustments and special consideration
- appeals
- customer service

This is the first post-recognition monitoring activity on Lifetime Awarding since the awarding organisation received recognition for the Qualifications and Credit Framework (QCF) in 2009.

The monitoring activities included desk research of information already held by us, examination of Lifetime Awarding's recognition application and scrutiny of the awarding organisation's website. We visited Lifetime Awarding's head office to

conduct interviews with staff and review documentation; we also attended a training day and visited the centre.

This report draws together our findings from these monitoring activities.

About Lifetime Awarding

Lifetime Awarding (LAO) offers a range of qualifications in the QCF. These are developed in collaboration with a variety of organisations to enable the award of qualifications for defined areas of the fitness industry exclusively for Lifetime. For more information on Lifetime Awarding and the qualifications it offers, visit its website at www.lifetimeawarding.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. Lifetime Awarding (LAO) was recognised as an awarding organisation in 2009. It grew out of the company Lifetime, a private limited company which developed bespoke courses in the fitness and related sectors. At that time LAO's sole purpose was to service Lifetime by developing qualifications based on the original courses and/or other qualifications the company wanted to offer. Lifetime is a training provider offering qualifications from a number of awarding organisations including LAO.
2. LAO is going through a period of significant change as it prepares to become a commercial organisation, enabling other centres to offer its qualifications. It is looking at changing its name and is reviewing its management structures. We noted the draft business plan which makes reference to some proposed changes to the structure of the awarding organisation.
3. The existing governance arrangements do not meet the regulatory criteria and have changed since LAO's initial recognition. Firstly, in LAO's original QCF application the non-executive director of Lifetime was identified as the single-named point of accountability, but this individual no longer has this role. Currently it is not clear who at LAO or Lifetime has this responsibility although the awarding organisation manager has identified many of the issues raised in this report through self-assessment. In addition, the awarding organisation manager is reporting to the Commercial Director who has responsibility for the commercial launch of LAO and is also head of the marketing department within Lifetime. Therefore, the awarding organisation is reporting to the centre, Lifetime, which is a clear conflict of interest.
4. LAO has an Independent Advisory Committee (IAC), which receives, for example, reports on appeals and malpractice. Its remit includes reviewing LAO's policies and practices for compliance with regulatory requirements, and providing direction and support with regard to organisational growth and development. Membership of the IAC is drawn from businesses in the sector and quality assurance experts. All have voting rights in any decision making. At present LAO is awaiting confirmation of the appointment of a new chair that is independent of LAO and Lifetime. We noted that the membership also included a staff member from Lifetime, which is a potential conflict of interest.

5. The awarding organisation does not have a conflict of interest policy explaining how the relationship and/or conflicts of interest between LAO and Lifetime are identified and managed. There are service level agreements (SLAs) in place between Lifetime and LAO for the delivery of finance, marketing and IT, as these are shared services.
6. From our discussions about unit and qualification development we noted there are instances of cross-working between LAO and Lifetime, which are supported by an SLA. However, this agreement shows Lifetime as the department in control of the development process. For example, the majority of decisions relating to product development are under the control of the Product Development Group, a group within Lifetime.

The SLA between the training department of Lifetime and LAO states the roles and responsibilities for unit/qualification development with Lifetime submitting units/qualifications to LAO for agreement.

7. We expect the development of units and qualifications as specified in the QCF regulations to sit with LAO as the lead partner with the roles and responsibilities of each contributing organisation or department clearly defined. Our arrangements clearly specify that the lead partner must be a recognised organisation.
8. Awarding organisations are required to publish fees structures. There is no reference to fees on the LAO website, nor is the cost of fees payable for appeals published. We also noted that LAO has not published details of its full suite of qualifications available in the QCF. Currently the website only shows two qualifications as available.

Non-compliance

1. LAO must review and amend its governance and management structures for controlling the delivery of its regulated functions so that they comply with the regulatory arrangements.

(Regulatory Arrangements for the Qualifications and Credit Framework, August 2008, paragraphs 2.1a and c)

2. LAO must inform the regulators of the single named point of accountability responsible for maintaining the quality of the regulated functions, and ensure that the current job description reflects the requirements of this role.

(Regulatory Arrangements for the Qualifications and Credit Framework, August 2008, paragraph 2.1b)

3. LAO must have a conflict of interest policy detailing how conflicts are identified and managed between LAO and other organisations, and/or departments of Lifetime.

(Regulatory Arrangements for the Qualifications and Credit Framework, August 2008, paragraph 2.2)

4. LAO must review the current SLA for unit, RoC and qualification development, so that it is clear that the lead organisation is the recognised organisation.

(Regulatory Arrangements for the Qualifications and Credit Framework, August 2008, paragraph 2.3)

Observations

There are no observations in relation to this section.

Resources and expertise

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 2.4–2.6, 3.1, 4.1, 5.2, 5.5 and 5.6e

Findings

1. LAO has two full-time, one part-time staff member, and three contracted External Quality Assurance Consultants (EQACs), one of whom is the lead EQAC. The awarding organisation uses additional external consultants and/or expertise from within Lifetime as required. We asked where responsibility for the regulated functions would sit if the AOM was unavailable for a continuous period and if commercial centres outside of Lifetime were recognised. LAO confirmed there are no contingency plans in place to cover the AOM role, but that funding could be requested for additional if necessary and where a business case for this could be made.
2. There is a company-wide staff appraisal system in place, which includes the review of performance, identifying training needs and setting objectives.
3. Currently the awarding organisation uses a range of experts to develop units and/or qualifications and assessment methodology. These experts may be come from outside of LAO, be EQACs or staff from the company Lifetime.
4. We asked how LAO ensured that when qualifications are developed, staff and contractors had sufficient expertise in the development, review and assessment of units, qualifications and RoC. LAO confirmed that all individuals attend a two-day internal event delivered by the Qualifications and Curriculum Development Agency (QCDA). In addition, developers are given QCDA guidance documents to assist them in their role.
5. There are suitable arrangements for recruiting and training EQACs, which include an application process. We looked at agendas of training days, which covered issues such as risk management, sampling, and e-portfolios. EQACs complete a SLA for the provision of services, but the requirement to declare any conflicts of interest is not explicit.
6. LAO is developing a new technical system to support the delivery of the QCF and automate its systems for registration, certification and centre recognition. The new system is due to go live by March 2011. Currently the awarding organisation uses a manual system for recording data on spreadsheets, which are checked by an external consultant for accuracy.

7. We asked what arrangements LAO had for business continuity and disaster recovery. The awarding organisation showed us the adverse weather policy, which details the arrangements. The AOM also confirmed that staff members are issued with laptops and remote access so they can work remotely. All data is backed up daily to off-site servers and is managed by an external organisation.

Non-compliance

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

Observations

1. LAO should consider contingency planning for key personnel and keep staffing resources under review if it recognises additional centres.
2. LAO should update the service level agreement for EQACs, making the requirement to declare conflicts of interest explicit.

Self-evaluation and continuous improvement

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 2.7–2.10

Findings

1. LAO has systems in place to evaluate its policies and procedures, and regulated functions, but the process is not documented. The AOM confirmed that they had reviewed parts of the QCF application and developed an action plan. We looked at the action plan, which clearly identified issues relating to management and governance.
2. The awarding organisation collects feedback, but as it only has one centre the procedure for this is not formalised. LAO will need to consider how it can provide opportunities for users to contribute to its self-evaluation arrangements, particularly if additional centres are recognised.

Non-compliance

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

Observations

3. LAO should document its procedures for self-evaluation and consider how it can provide opportunities for users to contribute to the process.

Diversity and equality

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

Findings

1. LAO has an equal opportunities policy that includes information on reasonable adjustments and special considerations. The awarding organisation intends to distribute the policy to new centres when they are recognised. EQACs have attended training sessions in diversity and equality and will be responsible for monitoring centres' compliance with LAO's equal opportunities policy. However, although the published policy complies with equalities legislation, it does not explicitly relate to the regulated functions as required by the QCF arrangements.
2. The awarding organisation has written guidance documents, such as one entitled 'Access to assessment,' so that future centres understand what is required if they are to ensure equality of access to qualifications and assessments.
3. Some of LAO's units have been written for learners with specific needs, for example, units for children with obesity and exercise issues. LAO has consulted with experts in the field and learners to identify barriers when writing units but this is not described within the development process. We are confident that diversity and equality is considered during unit and RoC writing, but this is not explicitly documented.
4. Data is collected during learner registration, but statistical analysis has only been carried out in relation to ethnicity; this data is collected and reported to the relevant sector skills council (SSC) forum. The awarding organisation has not developed procedures which will allow it to use the collected data to monitor its compliance with paragraphs 2.11 to 2.13 of the QCF arrangements.

Non-compliance

5. LAO must use the data collected to monitor and evaluate its compliance with the requirements set out in paragraphs 2.11 to 2.13.

(*Regulatory Arrangements for the Qualifications and Credit Framework*, August 2008, paragraph 2.14)

Observations

4. LAO should review its equal opportunities policy so that it is clearly aligned to the regulated functions.
5. LAO should revise the procedure for developing units and RoC so that it is clear at what point diversity and equality is considered.

Development of units and RoC for qualifications

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

Findings

1. Currently LAO develops qualifications at the request of Lifetime. The awarding organisation makes use of Lifetime's market research from the relevant SSC, sector employers and feedback from learners. It also has early dialogue with the relevant SSC for the qualifications it intends to develop.
2. Business case proposals for qualifications are submitted to the Product Development Board (PDB), which looks at the viability of a qualification. The PDB makes the decision to develop qualifications and agrees the business case. However, the PDB is part of Lifetime, not LAO, and we would expect the awarding organisation to be in control of the development of units, RoC and qualifications.
3. Once a business case is agreed a project team is set up to develop the qualification. Team members include LAO and Lifetime staff, and external consultants as required. LAO confirmed that it has access to additional internal and external experts. There is an SLA in place detailing the roles and responsibility of each member of the team.
4. The processes for developing units of assessment and RoC are suitable. For example, the AOM interrogates the QCF databank for similar qualifications before new units or RoC are developed. Subject specialists produce units and RoC that comply with the design specification of section 1 of the QCF arrangements. Credit is determined using a quantitative calculation and a level scorecard of learning time based on an average learner and a qualitative discussion. A panel agrees the level and credit for units. The panel includes the AOM, external consultants and Lifetime staff. The panel meets face to face and uses email and telephone to finalise level and credit.
5. Subject experts discuss the RoC and produce meaningful combinations of units for the qualification. Qualifications allow credit transfer and accumulation. Some credits can be used with other qualifications. For example, the Level 3 Diploma in Exercise Referral uses anatomy and physiology, and nutrition units from the Level 3 Certificate in Personal Training.
6. A project management system is in place for the development of qualifications. This was initially developed by a staff member from LAO after which the

responsibility for product development was moved back to Lifetime in 2010. We were shown how the system was used for the development of the LAO Level 3 Diploma in Exercise Referral and the qualification specification electronically tracks each stage of the process.

7. The AOM carries out a technical check of the units and RoC before a qualification is entered on to the database.
8. We asked about the procedure for the on-going review of units of assessment and RoC, but currently there is no documented procedure in place.

Non-compliance

6. LAO must review the role of the PDB and positioning of unit, Roc and qualifications development so that it has full control over the regulated functions.

(Regulatory Arrangements for the Qualifications and Credit Framework, August 2008, paragraphs 3.2 and 4.3)

7. LAO must have procedures in place for the on-going review of units of assessment and RoC.

(Regulatory Arrangements for the Qualifications and Credit Framework, August 2008, paragraphs 3.3 and 4.4)

Observations

6. LAO has a process to determine credit but should review the system used so that credit is based on the learning time required to achieve the learning outcomes to the standard determined by the assessment criteria.
7. LAO should develop a procedure to identify qualification development from its own research.

Design and development of assessment

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

Findings

1. We asked how LAO designs and develops assessment methods. The awarding organisation uses a variety of assessment methods, and the majority of these are forms of independent assessment. Methods of assessment include multiple-choice question examinations, electronic portfolios, practical examinations and assignments.
2. In the case of MCQ examinations, subject experts from Lifetime write the items. We met with Lifetime staff who confirmed there was an SLA in place. The SLA states that Lifetime 'will ensure that appropriate assessment methodology is applied to new awards/units'. This implies that Lifetime is in control of designing the assessment methodology with input from LAO.
3. Items are evaluated by a moderation panel, consisting of LAO and Lifetime staff, and piloted with learners from Lifetime tutor groups to identify any ambiguities. Changes are made to items based on feedback.
4. Question papers are given to Lifetime by LAO. Currently there are two set papers for the Level 3 Diploma in Exercise Referral. Items are uploaded to a specific database controlled by Lifetime, and matched against assessment criteria and learning outcomes to ensure coverage. We visited Lifetime to look at the operation of the database. Lifetime informed us that it is working towards the automatic generation of multiple choice question papers by randomising the items from the databank.
5. The issue for LAO to resolve is who has control of the regulated functions database and the development of assessment. As the awarding organisation, LAO is responsible for the production and evaluation of assessment methods, in this case items for multiple choice question examinations. We expect this process to be controlled and managed by LAO rather than by a centre or department outside of the awarding organisation.
6. External consultants write case studies. LAO uses an invigilated predictive case study for the Level 3 Diploma in Exercise Referral. The marking scheme uses weighted assessment criteria that ensure the sufficiency of evidence.

7. There is currently no documented procedure for the design and development of assessment.

Non-compliance

8. LAO must ensure that it has full control of the procedures for designing, developing and reviewing assessment.

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

9. LAO must have procedures in place to review its processes for the design, development and review of assessment methods.

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

Observations

There are no observations in relation to this section.

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, 5.16b and 5.20–5.23

Findings

1. LAO has procedures in place to ensure there are defined roles and responsibilities for those involved in the assessment process. These roles are clearly stated in the guidance documentation for centres.
2. The procedures for examination papers detailed in Appendix C – policies clearly states that exam papers and invigilation sheets are to be returned to LAO for marking and issuing of results to centres. While we recognise that LAO is being proactive in writing procedures for centres there is currently only one centre, and that centre marks the papers rather than LAO.
3. The awarding organisation has delegated the authority for making assessment decisions for multiple choice question examinations to Lifetime. For example, Lifetime distributes the multiple choice question examinations, marks them and issues the results to its assessment sites. LAO does quality assure the multiple choice question examinations through unannounced visits and EQAC monitoring visits. This includes sampling multiple choice question examination results.
4. We visited Lifetime to look at the processes for marking multiple choice question examinations. The centre is currently testing specific software, which enables MCQ papers to be scanned and uploaded for marking. There are automatic flags in the system, such as a bar code, which maps the multiple choice question examination to the correct answer paper. The system also maps the answers against the assessment criteria so that learners have an indication of any areas of weakness. We have confidence in the system being used but consider that it should be under the control of LAO rather than Lifetime.
5. There have been some problems with the system, so current papers are manually marked. Centre staff confirmed that administrators mark the fitness qualifications, and more specialist qualifications are marked by technical experts. Papers are sampled by the Regional Manager.
6. While we understand the rationale for delegating the authority for marking and issuing of results to Lifetime, this arrangement cannot continue in the current format if additional centres are recognised. It would be a clear conflict of interest

for Lifetime to mark MCQ examinations for its own learners and LAO would not be in control of the whole process across all centres.

7. We looked at the procedures for quality assuring internal assessment. EQAC's carry out observations of assessment and internal verification practice. Reports are produced, which are reviewed by the AOM and sent to the relevant assessment site.
8. LAO specifies its arrangements for internal quality assurance at centre level, which include the requirement for keeping records, and defining timelines and suitable procedures for internal verification. These procedures are checked during EQAC visits. The centre visited confirmed that it was aware that moderation activities should be recorded.
9. There are suitable arrangements to authenticate learners' work. For example, learners have to bring identification when taking multiple choice question examinations. They also make a signed declaration for any written work submitted, such as case studies.
10. There are arrangements in place to monitor the performance of EQACs, which include accompanied visits by the AOM and the review of reports. However, we noted that there is no formal recording of the accompanied visits.
11. Contractually, centre assessors and internal verifiers must declare personal interests have as part of their contractual requirements to declare personal interests at centre level.
12. Both LAO and Lifetime confirmed that they have arrangements in place for the recognition of prior learning (RPL).

Non-compliance

10. LAO must document its arrangements for delegating the authority to administer and mark MCQ examinations to Lifetime and ensure that it has full control of the processes.

(Regulatory Arrangements for the Qualifications and Credit Framework, August 2008, paragraph 5.5)

Observations

8. LAO should consider how it will take forward the arrangements for marking MCQ examinations to prevent conflicts of interest when additional centres are recognised. Any existing policies will need to be updated to reflect changes.

Centre recognition

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

Findings

1. Staff members at LAO are aware of the requirements for centre recognition and have developed arrangements for possible future centres, but these do not include an application form. Its single centre, Lifetime, has not been subject to any recognition arrangements, which is a regulatory requirement. Consequently the centre has not agreed to give the awarding organisation and regulators access to its premises, staff and records.
2. The awarding organisation is developing a separate web-based system to upload specific information from centres, such as details of the accumulation of credits.
3. It was not possible to test the centre recognition process or web-based system as these arrangements have not been fully implemented and currently are not subject to any review process.

Non-compliance

11. LAO must implement its centre recognition procedures and ensure that Lifetime and any future centres meet all the requirements detailed in the QCF arrangements.

(Regulatory Arrangements for the Qualifications and Credit Framework, August 2008, paragraph 5.11a–h)

12. LAO must ensure that its centres agree to provide the awarding organisation and the qualifications regulators with access to people, premises and records.

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

13. LAO must develop procedures detailing how it will review its processes for the delivery of assessment and centre recognition.

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

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, 5.16 c–d and 5.19

Findings

1. LAO have a database that holds the information on their learners and the unit/qualification they are registered for. Centres email the outcome of the learners' assessments on a certification request spreadsheet. The data is manually checked by LAO and also cross-checked by an external consultant to ensure that the learner is awarded the correct qualification and that there are no duplicate registrations.
2. Certification request spreadsheets with outstanding issues are returned to the centre, for example, if the learner is not registered or there is a waiting period before the certificate can be claimed.
3. LAO does not accept registrations without a unique learner number (ULN), which the centre requests from Managing Information Across Partners (MIAP).
4. There are suitable systems for issuing credit and qualification certificates. LAO uses specialist software to print the certificates and access to the software is limited to two staff members. Certificates are issued within ten days. We noted that the name of the single named point of accountability has not been updated but LAO is aware of this requirement.
5. LAO has procedures in place for issuing replacement certificates. Currently learner credits are logged onto a spreadsheet and checked by the EQACs against the Learner Record Service (LRS). We were shown a copy of a replacement certificate, which was suitably labelled.
6. The awarding and certification process has been reviewed. LAO has started uploading all of its learners' data onto a new IT system, which allows online registration and certification. This is a secure system accessed with a user name and password. Levels of access to the IT system at the centre will depend on the user's role. This rule applies internally in LAO, for example EQACs have different levels of access.
7. LAO has safeguards in place to prevent mistaken claims for certificates. The awarding organisation informed us when the centre requested a number of certificates in error. The EQACs identified where the errors were made and put together an action plan to address the identified gaps in the evidence.

8. At present the recording of credit and completion of a RoC are recorded on spreadsheets forming part of LAO's database. This procedure will be carried out automatically by the IT system from March 2011. Once a learner has completed the RoC for a qualification, this will be automatically flagged on the system.
9. LAO confirmed that it uses manual statistical analysis and visits by EQACs to ensure the comparability of standards over time and across assessment sites, units and qualifications at the same level.

Non-compliance

14. LAO must ensure that all certificates meet the requirements outlined in Annex D of the *Regulatory Arrangements for Qualifications and Credit Framework*.

(Regulatory Arrangements for the Qualifications and Credit Framework, August 2008, paragraphs 5.13a and 5.15a)

Observations

There are no observations in relation to this section.

Malpractice

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 5.29–5.32

Findings

1. LAO has suitable published procedures for dealing with malpractice on behalf of learners, assessors and centres. Information on malpractice is included in the document *Guidance for Delivering Lifetime Awarding Qualifications* and requires centres to report any cases of malpractice to LAO.
2. Learner malpractice is initially investigated by the centre and the findings are reported back to LAO using the Malpractice Report Form. For theory exams, the invigilator is expected to provide a written statement detailing the potential malpractice.
3. LAO has had a case of maladministration, which was reported to us. The centre claimed certificates for a large number of learners before the assessment was completed. LAO investigated the above issue, which was found to be due to an administrative error. The awarding organisation took corrective action, and although certificates were printed they had not been issued to the centre and were destroyed.

Non-compliance

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

Observations

There are no observations in relation to this section.

Reasonable adjustments and special consideration

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 2.13, 5.7–5.8 and 5.16b

Findings

1. LAO has suitable procedures in place for reasonable adjustments, which are published on the website. The procedures detail types of reasonable adjustments and provide a table, which clearly identifies adjustments that centres can make without approval from LAO and the adjustments that have to be referred to LAO through the EQAC. The centre is also provided with guidance on access to assessment.
2. The AOM and Lead EQAC make decisions about reasonable adjustments; EQACs are informed of all decisions.
3. EQACs advise centres if reasonable adjustments are approved and record this on the EQAC report form together with any sampling of assessments where reasonable adjustments have been made.
4. Guidance to centres lists circumstances for special considerations. Invigilators complete a special consideration form. There is no timescale to inform LAO about special considerations.
5. Learners contact Lifetime for special considerations for MCQs. Learners take the assessment at the next assessment opportunity. There is no facility to adjust marks if special consideration is requested.
6. The AOM has responsibility for ensuring the forms are completed at the centres, and also for permissions given on reasonable adjustments and special considerations. There are no examples of reasonable adjustments or special considerations.
7. The Head of LAO is responsible for signing off all requests, but to date no requests have been received.

Non-compliance

15. LAO must have a documented procedure for special considerations, detailing the circumstances when special consideration will apply and the eligibility criteria.

(Regulatory Arrangements for the Qualifications and Credit Framework, August 2008, paragraph 5.8)

Observations

There are no observations in relation to this section.

Appeals

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 5.24–5.28

Findings

1. The QCF arrangements require awarding organisations to have published procedures so that learners and centres can enquire about or appeal against assessment decisions. The existing procedures do not fully meet the regulatory requirements or reflect current practice. For example, the document *Guidance for Delivering Lifetime Awards* refers to enquiries about external theory results and to centres returning scripts to LAO. Current practice is that the MCQ papers are returned to Lifetime, although LAO can access them if required.
2. We looked at the existing appeals policy and noted that fees for appealing or enquiring about assessment decisions are not published.
3. As part of the appeals regulations, awarding organisations must have arrangements to protect the interests of all learners if an upheld appeal brings into question the accuracy of results. While this is covered in the Appeals flowchart there is no reference to this in the published policy.
4. It was not possible to test the effectiveness of the appeals procedure as there have been no appeals to date.
5. The AOM explained what the awarding organisation would do when monitoring, evaluating and reporting on its appeals arrangements, but there is no documented procedure.

Non-compliance

16. LAO must publish its fees for enquiries and appeals.

(Regulatory Arrangements for the Qualifications and Credit Framework, August 2008, paragraph 5.26d)

17. LAO must document its annual procedures for monitoring, evaluating and reporting on enquiries and appeals.

(Regulatory Arrangements for the Qualifications and Credit Framework, August 2008, paragraph 5.28)

Observations

9. LAO should review its enquiries procedure so that it accurately reflects the process to be followed.
10. LAO should update the appeals policy to include reference to the accuracy of results as indicated in the Appeals flowchart.

Customer service

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraph 5.3

Findings

1. We require awarding organisations to publish a customer service statement detailing the quality of service offered in relation to units and qualifications..
LAO has a section on communication within the document *Guidance for Delivering Lifetime Awarding Qualifications*, which provides information on performance standards and complaints. However, the policy does not include any reference to the quality of service customers can expect in relation to its units or qualifications. For example, there is no reference to performance measures such as target times for the issue of certificates or signposting to where information on fees can be found, nor are there points of contact.
2. LAO does encourage learners to contact the awarding organisation with positive or negative feedback, either by email or by telephone in the letter that accompanies a certificate.
3. LAO confirmed that it is in the process of reviewing all of its customer service documents.

Non-compliance

15. LAO must publish a customer service statement that meets the requirements of paragraph 5.33 in full.

(*Regulatory Arrangements for the Qualifications and Credit Framework*, August 2008, paragraph 5.33)

Observations

There are no observations in relation to this section.

We wish to make our publications widely accessible. Please contact us if you have any specific accessibility requirements.

First published by the Office of Qualifications and Examinations Regulation in 2011

© Crown copyright 2011

You may re-use this publication (not including logos) free of charge in any format or medium, under the terms of the [Open Government Licence](#). To view this licence, [visit The National Archives](#); or write to the Information Policy Team, The National Archives, Kew, Richmond, Surrey, TW9 4DU; or email: psi@nationalarchives.gsi.gov.uk.

This publication is also available on our website at www.ofqual.gov.uk

Any enquiries regarding this 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