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# **Awarding body monitoring report for: The Graded Qualifications Alliance (GQAL)**

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## Introduction

### Regulating external qualifications

Responsibility for regulating external qualifications lies jointly with three regulators:

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

Following the accreditation of a qualification, the regulators systematically monitor awarding bodies against the requirements set out in the statutory regulations. The aim of this activity is to promote continuing improvement and public confidence in the quality of external qualifications.

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

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

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

### Banked documents

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

A suite of documents has been identified as suitable for banking and are those that are considered to be most crucial in supporting an awarding body's ability to operate effectively. To maintain the currency of the banked documents, awarding bodies are responsible for updating them as and when changes occur. They are also reminded to review them at least annually at the time of completion of the self-assessment return.

## **About this report**

The monitoring activity for the Graded Qualifications Alliance (GQAL) was carried out by Ofqual on behalf of the regulators in May 2009.

The monitoring focused on the regulatory criteria relating to the following key areas but specifically those relating to the governance arrangements and management of qualifications across all members of the alliance:

- corporate governance
- resources and expertise
- qualifications development
  - planning
  - content and design of assessment
- assessment arrangements
  - independent assessment.

The monitoring activities included desk research of information already held by the regulators, including the awarding body recognition update (2004), banked documents and scrutiny of the GQAL website. The monitoring team visited the GQAL head office to conduct interviews with staff and review documentation. Visits were also carried out to a member organisation and an associate member organisation. A representative of Ofqual observed a governing council meeting.

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

## **About GQAL**

GQAL is an alliance of three full members acting together as a consortium for the development, delivery and award of qualifications. For further information, see [www.gqal.org.uk](http://www.gqal.org.uk).

## Corporate governance

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

### Findings

1. GQAL is an awarding body made up of three member organisations. These are the British Theatre Dance Association (BTDA), The Manchester College and Exeter University. These organisations were brought together to award and deliver qualifications with a specific focus on graded qualifications.
2. GQAL was last monitored in 2004. At that time it was a new organisation with only one of its members, the BTDA, having accredited qualifications. BTDA systems and procedures were fully scrutinised at that time.
3. The current monitoring activity is concerned with reviewing the governance arrangements of GQAL along with the role of its member and associate member organisations whilst focusing on the systems and procedures.
4. All three GQAL member organisations have signed up to a joint heads of agreement document that states their relationship and responsibilities to each other.
5. GQAL is wholly owned by the BTDA. GQAL contracts with the BTDA to provide the administrative support and resources required for the day to day operation of the awarding body.
6. The principal point of accountability for maintaining the quality and standards of the qualifications is the GQAL general secretary. The key responsibilities for this role state that the post holder has 'general oversight of qualifications delivery' and 'oversight of aspects of quality assurance'. This must be expanded to more accurately describe the role of the principal point of accountability.
7. GQAL has a council of management, which has the legal responsibility for GQAL Ltd. It is responsible for the strategic development and operation of the GQAL business.
8. A further committee, the GQAL governing council, is more pertinent to the work of the awarding body. This committee acts as both an academic standards board and a communication channel to the alliance members. The three full member organisations

report to this committee, which meets twice a year. An Ofqual representative observed one of these meetings.

9. The monitoring team noted that the terms of reference for the Governing Council are 'under review'. GQAL staff stated that this was due to changes in the governance of The Manchester College. Once The Manchester College has ratified its own arrangements, the terms of reference will be reviewed and any changes made.
10. GQAL has one sub-committee: the examinations, standards and quality assurance Committee. This is a change since the previous monitoring. This committee has been formed from the merger of two committees: the standards and quality assurance committee and the examinations committee. Its remit is to monitor the assessment processes by receiving reports from examiners and making recommendations to the Governing Council.
11. It was the original intention that the three alliance members would have responsibility for delivering their own GQAL accredited qualifications. However, one member, Exeter University, has reviewed this arrangement and has concluded that it does not have the capacity to deliver qualifications. The role of this organisation is now seen as a research partner whilst retaining full GQAL member status.
12. GQAL has, through the joint heads of agreement document, devolved the responsibility for administering qualifications to each member organisation. However, there is no formal procedure in place to centrally oversee and monitor how well this responsibility is being carried out. The regulator would expect this to be the role of the nominated principal point of accountability but the key responsibilities for this post are not sufficiently detailed. (see also paragraph 6).
13. The monitoring team was shown a document – The GQAL principles of awarding and quality assurance November 2007 – that outlines a process for a quality assurance system, but this document has not been issued or adhered to. GQAL needs to have control over all the activities being carried out on its behalf. This is a recurring theme throughout this report.
14. For example, one member organisation, The Manchester College, is delivering GQAL qualifications. Although, in addition to the joint heads of agreement document GQAL has drawn up a draft service level agreement that details the roles and responsibilities for this qualifications delivery, it has not been implemented. At the time of monitoring there is no

formal process for checking that the qualifications being delivered by alliance members comply with the statutory regulations.

15. The main suite of qualifications for Personal, Employability, Achievement and Reflection for Learning (PEARL) are being delivered initially as a 'pilot' through The Manchester College.
16. GQAL intends to roll out the PEARL qualifications on a national basis from September 2009. However, the qualification is currently delivered by employees of The Manchester College on its premises. It was not clear to the monitoring team how GQAL would resource and implement delivery of the qualification nationally. To date, approximately 4000 certificates have been issued and national roll out has the potential for large numbers of candidates. GQAL needs to consider how it will manage this.
17. Another qualification, the level 2 National Certificate for Personal License Holders (NCPLH), is being delivered through an external organisation, Developing Hospitality, brought in as an associate member. Application criteria for associate membership include being sponsored by a full member, in this case the BTDA. All members must agree to its inclusion and the processes it will be using before being approved. GQAL is anticipating that this associate membership will grow.
18. However, other than the associate membership agreement there is no document in place that details who is responsible for which aspect of the quality assurance and delivery of the qualification. Furthermore, there has been no formal monitoring of Developing Hospitality or its systems to enable GQAL to be assured that it meets the statutory regulations.
19. BTDA fees are agreed annually by the councils of management. However, GQAL needs to have a procedure for the setting and reviewing of fees for all of its accredited qualifications.
20. In reviewing GQAL's banked documents, the monitoring team noticed that although the banked documents exist they are not published. They were not on the website or in any other printed document. GQAL staff stated that information is provided to teachers through meetings and newsletters and to members through the association. GQAL is required to publish its policies and procedures and make them available to anyone who has an interest in GQAL qualifications.



21. GQAL is also required to consider how it will ensure that the policies and procedures of associate members are more consistently aligned and that they all meet the regulatory criteria.
22. It should also be noted that the GQAL website does not contain much guidance or information on its qualifications. There are links to the partner organisations' home pages and only the NCPLH is referred to in any detail. The website address stated on the national qualifications database is that of BTDA and not that of GQAL. This is misleading for potential centres and candidates. Furthermore, the BTDA website does not have any link to the GQAL website.
23. With the exception of two minor amendments to be made to the customer service statement and the malpractice procedure, the banked documents were agreed as meeting the regulatory requirements.

## **Accreditation conditions**

1. GQAL must produce a written statement of each member organisation's responsibilities, including which is responsible for which aspects of quality assurance, where it offers qualifications in partnership, consortium or license with other organisations (*The statutory regulation of qualifications in England, Wales and Northern Ireland (2004)*, paragraph 5c).
2. GQAL must be able to guarantee that any franchised or licensed organisation (associate member) offering its qualifications will comply and continue to comply with the regulatory criteria (*The statutory regulation of qualifications in England, Wales and Northern Ireland (2004)*, paragraph 5e).
3. GQAL should expand the job description for the General Secretary to include being the principal point of accountability for maintaining the quality and standards for all its accredited qualifications (*The statutory regulation of qualifications in England, Wales and Northern Ireland (2004)*, paragraph 5b).
4. GQAL must have a policy for the setting and reviewing of fees for its accredited qualifications (*The statutory regulation of qualifications in England, Wales and Northern Ireland (2004)*, paragraph 7).
5. GQAL must publish its procedures and policies and make them available to all who need them (*The statutory regulation of qualifications in England, Wales and Northern Ireland (2004)*, Customer service paragraph 32, malpractice paragraph 28, enquiries and appeals paragraph 23, reasonable adjustments and special consideration paragraph 17).

## **Observations**

1. GQAL must review how it uses its website. Websites are a vital tool in promoting the work of the awarding body but only if they are up to date and contain relevant information.

## Resources and expertise

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

### Findings

1. GQAL operates a service level agreement with BTDA for the provision of staff. There are six fulltime staff based at BTDA to deal with the awarding body functions. GQAL also has access to part time staff as required. Staffing levels were reviewed as part of the previous monitoring activity and GQAL has the capacity to recruit four additional staff if registrations for its qualifications increase substantially.
2. This section focuses on the resources, expertise and systems used by the other alliance members delivering qualifications, The Manchester College and the associate member organisation, Developing Hospitality, which is also delivering a GQAL qualification. It focuses on their systems to recruit and train assessment and moderation teams. Both were visited by the monitoring team.
3. The Manchester College uses supervisors, tutors and independent assessors to assess the PEARL qualification. The arrangements for recruiting, training and monitoring the assessment team have been formalised by newly appointed staff responsible for the programme. Prior to this, the assessment team was drawn from college staff and followed a specific training programme.
4. Developing Hospitality has four office staff, four verifiers and a team of markers. The monitoring team discussed the arrangements for recruiting and training markers with staff. Although the arrangements are not fully documented, the monitoring team considered these to be adequate. There was evidence of training for the markers and verifiers.
5. There are technical resources in place to support the work of the awarding body but it uses two databases. One holds candidate information for qualifications being delivered by BTDA and the other holds data for GQAL and the qualifications being delivered by the other members and associate members. Whilst GQAL has contingency plans in place to store data offsite on a separate server, the data from BTDA is backed up daily and kept in a fireproof, flood resistant safe on its premises. GQAL as the awarding body needs to review this system as it does not have full control of all data for each member of the alliance.

## **Accreditation conditions**

6. GQAL must monitor all partners' and associate members' arrangements for ensuring the sufficiency of resources and the competence and training of staff or associates against the regulatory requirements (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 10).
  
7. GQAL must ensure that it has the technical resources to support the qualifications it offers. It must review the current system for storing data so that it has control over all information relating to its candidates and qualifications (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 8).

## **Observations**

There are no observations for this section.

## Qualifications development

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 1, 4, 33a and 43–55.

### Findings

1. GQAL member organisations follow an informal process for developing and submitting new awards. The process is partly documented in GQAL new awards submission process but it is not clear how this process is made available to members. The process does not include revising or updating existing accredited qualifications. One of the directors of GQAL monitors the end dates for qualifications.
2. Initial proposals for new qualifications can come from any of the three member organisations. If the Council of Management agrees to the development of the proposal, the member will carry out full market research as to the viability of the product.
3. GQAL again devolves responsibility to the individual member organisations but it must ensure that the process for qualifications development is robust and consistent. GQAL must provide more detailed guidance to its members. Guidance could include staged milestones, information on what records to keep, who should be involved and arrangements for reporting, monitoring and sign off. There should also be someone in GQAL who maintains an oversight of all development activities.
4. Once the individual member has the supporting documentation prepared, it is reviewed by GQAL staff for factual accuracy, spelling and grammar. Staff also check that the relevant documents and attachments are included. There is no documented process for reviewing the content.
5. Immediately prior to submission to Ofqual, the General Secretary confirms that the information is to be uploaded on to Ofqual's web based accreditation (WBA) system. Queries come back from the regulator to the member submitting via the General Secretary.

### Accreditation conditions

8. GQAL must formalise its procedures for planning the development of new or revised qualifications (*The statutory regulation of qualifications in England, Wales and Northern Ireland (2004)*, paragraph 43).

9. GQAL must formalise its procedures for developing the content and design of qualifications. These must detail the stages of the development process, including decision points, sign off and checking arrangements (*The statutory regulation of qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 45–55).

## **Observations**

There are no observations for this section.

## Assessment arrangements: independent assessment

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

### Findings

1. GQAL offers a range of accredited qualifications. With the exception of the NCPLH, they are performance based but all are independently assessed. The monitoring team looked at the assessment methodology used by BTDA in the previous monitoring activity and is satisfied that the quality assurance systems are suitable. This activity focuses on the systems used by GQAL's partners and associate members delivering qualifications on their behalf.
2. The PEARL qualification is offered by The Manchester College. It is internally assessed by the involved assessor (tutor) and the final assessment is carried out by an independent assessor. Decisions are checked by the overall supervisor (moderator).
3. The monitoring team discussed with staff at The Manchester College the systems for promoting the consistency of assessment. A range of new systems and procedures for standardising assessments and monitoring the assessment team was introduced in April 2009. These include, for example, the sampling of assessment practice, attendance at standardisation events, confirming the authenticity of candidate evidence and checking the status of the independent assessor. The monitoring team noted these new arrangements but it was not possible to test the robustness of these systems during the visit.
4. Ofqual requires awarding bodies to have systems and procedures that produce reliable results. GQAL has devolved all responsibility for quality assurance of the PEARL qualification to The Manchester College. Statistical analysis is used to check the marks of the independent assessor and they are adjusted if required. However, there has been no formal monitoring of the systems used to ensure the reliability of results. GQAL cannot therefore be confident that the existing or previous arrangements to support the assessment and moderation of PEARL produces reliable results or meets statutory requirements.
5. The GQAL level 2 National Certificate for Personal License Holders (NCPLH) was developed and is being delivered by Developing Hospitality and is awarded by GQAL. Assessment is based on a multiple-choice question paper (MCQ). All examinations are

available on demand as required. The monitoring team looked at some of the quality assurance systems used by Developing Hospitality to deliver the NCPLH.

6. Developing Hospitality has systems in place to develop and evaluate items for the MCQ papers, which were discussed but not tested. All items are written by the managing director and evaluated by verifiers. Comments from centres about items used are also taken into account when questions are reviewed. Acceptable questions are put into the question bank, which has about 300 live questions.
7. Question papers are checked to ensure that the syllabus is covered across the 13 sections. Staff randomise the question papers by using an Excel spreadsheet, which ensures that the answers do not appear in the same sequence.
8. Question papers are reviewed prior to issue and three copies of the overlay template with answers is made, one for GQAL and two for Developing Hospitality. These are filed after use. The monitoring team noted that there is currently no system for checking the performance of questions, although they did commission a company to carry out statistical analysis of questions in 2006.
9. The monitoring team looked at the documented procedures for invigilation, security of examination papers, marking and verification, which were suitable but there is an issue with same day results.
10. The regulatory criteria require awarding bodies to carry out quality assurance checks prior to the issue of results. Developing Hospitality is using a system whereby the candidate takes the examination and the answer sheets are faxed to them for marking and verification. The marker uses the overlay template to ensure accuracy and it is further checked by the verifier. Results are then faxed back to the centre, usually within one hour, and issued to candidates. This system also allows candidates to re-sit a different paper on the same day if they have failed.
11. Question papers are sent to a specific member of GQAL staff, who also verifies the results using the overlay template prior to issuing certificates.
12. The documentation issued to candidates by Developing Hospitality states that they can have results on the same day. Whilst it is feasible to issue provisional results, candidates must be made aware that until they are confirmed by GQAL they may be subject to change. Final results must be confirmed and issued by GQAL and not its associate member.



13. While the monitoring team considers that the procedures used by its partners and associate members appear to be satisfactory, the overall concern for Ofqual is that GQAL itself is not in control of its partners or associate members. The lack of any monitoring of the quality assurance systems and procedures means that GQAL cannot guarantee that results are reliable.

### **Accreditation conditions**

10. GQAL must implement monitoring procedures to ensure that all partners and associate members meet the statutory regulations (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 36, 38–42 and 57–62).
11. GQAL must ensure that its systems and procedures produce reliable results (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 56).

### **Observations**

There are no observations for this section.