



# **Awarding body monitoring report for: ITC First Aid Limited (ITC)**

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## Introduction

### Regulating external qualifications

Responsibility for regulating external qualifications lies jointly with three qualifications regulators:

- the Office of the Qualifications and Examination 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**

This is the first monitoring activity on ITC First Aid Ltd (ITC) awarding body and was carried out between June and September 2008.

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

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

The monitoring activities included desk research of information already held by the regulators, attendance at an awarding body training event and scrutiny of the awarding body's website. The regulators' monitoring team visited ITC First Aid Ltd's head office to conduct interviews with staff and review documentation. Centres were also visited.

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

## **About ITC First Aid Ltd**

ITC First Aid Ltd was established in 2005. Its awarding body is currently accredited to offer two qualifications: one in sports related first aid and the other in outdoor first aid. For more information on ITC First Aid Ltd visit the website at [www.itcfirstaid.org.uk](http://www.itcfirstaid.org.uk).

## Corporate governance

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

### Findings

1. ITC First Aid Ltd is a company whose members' liability is limited by shares. The company also has a trading name (Immediate Temporary Care, known as ITC) that is recognised by the Health and Safety Executive (HSE) as a body awarding qualifications suitable for HSE requirements. There was some confusion over the use of the abbreviation ITC as this is how ITC First Aid Ltd, the awarding body, is commonly referred to. The awarding body must ensure that there is clarity when the abbreviation is used.
2. The awarding body has three committees. The Policy Review Committee governs its operation. Membership of this committee consists of three people: the owner of ITC First Aid Ltd (the awards manager – who is the single named point of accountability for maintaining the quality and standards of all qualifications), the chief verifier and the education consultant.
3. Two committees advise the Policy Review Committee on other issues. The Technical Committee is responsible for designing and developing qualifications. The Training Standards Committee is responsible for designing assessment relating to ITC First Aid Ltd's qualifications.
4. Outline terms of reference and membership details for these committees were provided to the regulators.
5. There is substantial potential for conflict of interest, including the fact that the chief verifier currently runs a training organisation that offers ITC First Aid Ltd qualifications, accredited and non-accredited, as well as acting as an assessor at approved centres.
6. ITC First Aid Ltd has grown out of the business' activities of the current owner as a sole trader. The regulators could see that control was effectively within the family who have various roles within the company. The reality of control depended upon personal relationships rather than on job titles.
7. This posed some difficulties, however, in looking for separation of duties and independent review. In particular, the regulators could not accept the situation where the chief verifier was acting as an assessor, training provider and sole external

moderator for the awarding body's accredited qualifications. The chief verifier and the awarding body accepted this view and undertook to remedy the position for the future.

8. The regulators used the documents that had been banked as part of their desk research activities in preparation for the post-accreditation monitoring. It emerged that the banked documents were out of date. ITC First Aid Ltd agreed to bring its documentation up to date and bank the revised versions.
9. The regulators examined the minutes of the Policy Review Committee. It met regularly and had discussions and made decisions on relevant issues.
10. A copy of the fees currently charged was provided and the regulators discussed in confidence with the awarding body's management its policy arrangements for setting such fees.

### **Accreditation conditions**

1. ITC First Aid Ltd must ensure that the chief verifier's centre is properly moderated or that the centre stops offering accredited qualifications of ITC First Aid Ltd. The chief verifier cannot act as an assessor at centres unless the work is independently moderated (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 5d).
2. ITC First Aid Ltd must update and bank those documents required by the regulators (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 6c).

### **Observations**

1. ITC First Aid Ltd should ensure that there is no confusion when the abbreviation ITC is used.

## 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. ITC First Aid Ltd provided full access to its records and staff. The administration of the awarding body is carried out by the awards manager and an assistant. All external moderation has been carried out to date by the chief verifier. In future there will be a team of regional external moderators, headed up by the chief verifier.
2. If additional expertise is required ITC First Aid Ltd makes full use of consultants who possess the necessary skills. The operational side was effective and routine activities were well monitored. However, it was difficult to understand how evaluation could be achieved, since all parties were fully occupied in the day to day running of the organisation. This suggested that further resource was required.
3. It was too early for there to be evidence that the awarding body ensured consistency of standards across time as the ITC First Aid's recognition as an awarding body had only taken place in late 2006.

### Accreditation conditions

There are no accreditation conditions for this section.

### Observations

2. ITC First Aid Ltd should consider whether its resources will allow effective evaluation to be carried out.

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

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 13, 36, 38–42, 56, 57 and 59–62.

### Findings

1. ITC First Aid Ltd qualifications are assessed by means of a quasi national vocational qualification (NVQ) system of internal assessment, internal verification and external moderation. Each of its two qualifications is made up of two units and candidates must pass both units to obtain the overall award. Competence is judged by the tutor/assessor on a candidate's ability to perform physical activities related to first aid, with repeated demonstrations until consistency can be proved. The internal verifier and external moderator monitor a training course and use this evidence as proof of performance by the tutor/assessor and internal verifier respectively.
2. ITC First Aid Ltd approves centres that can assess and internally verify its qualifications. In addition, it has providers where, to date, the awarding body has provided the internal verification function. In both cases, they are given direct claims status after the approver witnesses the competent delivery of a training course and related ongoing internal assessment. External moderation is then scheduled to take place a year later.
3. The regulators could not support the current system of quality assurance and control of internal assessment. During the monitoring activity the awarding body produced new concepts for centres and providers. In addition, they recognised the risks in allowing new centres to enjoy direct claims status immediately and for a period of 12 months without review.
4. The position of the chief verifier's centre was drawn to the regulators' attention by the chief verifier, given that he realised he had effectively moderated his own centre. He was also the person in charge of monitoring the work of his competitors. No one was monitoring his work. The regulators did not believe that there had been any deliberate attempt to create this situation and ITC First Aid Ltd was clear in stating that it would revise its systems as a matter of urgency.
5. At present ITC First Aid Ltd only delivers its qualifications through the medium of English. The awarding body is aware that it will need to have comparable arrangements in place if it offers assessment in other languages.

6. ITC First Aid Ltd's systems do not provide for candidates to be positively identified. This is important as the qualification is effectively a licence to practice. (The HSE require workers to have such a qualification for a number of jobs.) Candidates arrive at the training venue and registration forms are completed by the trainer who may not know the candidates.
7. The regulators were not convinced that the assessment records shown to them provided evidence that internal verifiers, external moderators or outside auditors needed to carry out their roles. The only evidence available, unless the verifier was present at the assessment, was a tick in a box. This is insufficient evidence that the candidate has met the required standards. Good practice was noted, however, in the level of detail provided to assessors on the witness statements for each emergency situation assessed. Some centres used these as additional evidence but the person who completed them varied from tutor/assessors to fellow candidates.
8. The awarding body did not provide clear guidance to its centres, particularly on the need to record questions and responses to oral questioning. Sampling guidance for internal verification and external moderation was provided but needs to be amplified.
9. The regulators informed the awarding body that it must revise its requirements of centres in respect of internal assessment and provide fuller guidance on internal verification. At present, if a candidate were to appeal, or an accusation made regarding candidates being 'allowed to pass', there was no evidence to help decide matters. ITC First Aid Ltd could consider other methods of producing evidence e.g. filming a sample of candidates' work at each centre or carrying out unannounced spot checks on candidates' competence at the end of a selection of courses.
10. If a quasi NVQ assessment and verification system is applied, with direct claims status, the external moderation must mirror the requirement to visit centres frequently with a guideline of at least two comprehensive visits per year.
11. When speaking with centres it became clear that some have been tailoring the training to particular candidate groups depending on the injuries their activities may have involved. In one way this is commendable but suggests that there is a need for separate units if this is widespread practice. The awarding body should check to see that all its centres assess the same things.

## Accreditation conditions

3. ITC First Aid Ltd must have procedures in place for monitoring the work of the chief verifier (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 36).
4. ITC First Aid Ltd must ensure that the evidence provided by candidates is authentic by stipulating that centres must identify their candidates and providing guidance on what is satisfactory identification (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 57a and 60g).
5. ITC First Aid Ltd must ensure that the evidence provided by candidates is clearly sufficient to a third party to prove competence by specifying the records that must be kept for internal verification and external moderation (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 57b, 60f and 61a).
6. ITC First Aid Ltd must check the work and compile reports on each external moderator (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 61f).
7. ITC First Aid Ltd must visit its centres frequently throughout the year to carry out external moderation taking into account the number of candidates and direct claims status (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)* paragraph 61c).

## Observations

3. ITC First Aid Ltd should revise its guidance on sampling for internal verification.
4. ITC First Aid Ltd should consider using other means of providing assessment evidence, such as filming a sample of candidates' work at each centre or carrying out unannounced spot checks on candidates' competence at the end of a selection of courses.
5. ITC First Aid Ltd should check to see that all its centres train and assess the same things and consider the need for optional units.

## Determination and reporting of results

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

### Findings

1. Candidates taking ITC First Aid Ltd qualifications are awarded a pass or fail result. In order to pass they must perform competently and consistently against all areas of assessment. The result is given to them verbally by the tutor/assessor at the end of the training course. In order to protect their right to amend results after moderation, ITC First Aid Ltd needs to instruct its centres that such information given to candidates must be flagged as provisional.
2. Courses have to run for 14 hours (First aid for sport) or 16 hours (Outdoor first aid) and candidates have to be present for that time. This is a requirement of the national governing bodies that use these qualifications, influenced by the HSE requirements for candidate contact training time in first aid at work. Despite perfect performance in assessment, ITC First Aid Ltd will not award the qualifications unless this time condition has been met. The requirement of attendance hours is not clearly stated in the National Database of Accredited Qualifications. ITC First Aid Ltd should review its entries in the database and clarify them. There is other information in the public database that needs to be reviewed since an understanding of it is sometimes dependent on the reader having access to other documents submitted to the regulator when applying for accreditation.
3. Results are advised to ITC First Aid Ltd directly by the tutor/assessor via the student assessment form. This form is a checklist of each activity assessed against each candidate's name. There is a space for the trainer's name but no one has to sign this form, although in practice they often do in the space where it asks for their name.
4. A claim for certification is signed and sent to the awarding body. The centre's internal verifier does not have to countersign this document. However, not all centres have their own internal verifier, as explained in the previous section of this report on internal assessment.
5. Once the results have been returned from centres, these are inputted to the database, with input cross-checked for accuracy. There is nothing else that ITC First Aid Ltd can do since the results are not capable of moderation, being merely ticks in the appropriate box. Decisions cannot be reviewed by the awarding body nor monitored by the regulators.

6. Statistics are kept on results so year on year comparison is possible.

## **Accreditation conditions**

8. ITC First Aid Ltd must ensure that comprehensive records are maintained of decisions made by assessors:
  - review decisions made in case of error
  - ensure centres inform candidates that tutor/trainers' assessments are provisional results, not final
  - ensure that the bases on which decisions are made are open to monitoring by the regulators

*(The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004), paragraphs 63 and 64).*

## **Observations**

6. ITC First Aid Ltd should ensure that the regulators have accredited the attendance hours requirement by the HSE.
7. ITC First Aid Ltd should edit the information provided in the National Database of Accredited Qualifications and also include the attendance hours requirement.

## Registration and certification

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 11–12 and 21–22.

### Findings

1. ITC First Aid Ltd has both centres and providers approved to deliver its qualifications. Centres are defined as organisations capable of carrying out internal verification. Providers cannot. As a result there are two separate systems for centre registration. The awarding body indicated that it was considering revising its centre/provider structure. The awarding body would then harmonise its centre approval documentation.
2. All organisations receive an approval visit from the chief verifier. Consideration is given to the quality of training as well as assessment given the quasi-NVQ nature of the qualification. An action plan is produced, where required, and this is monitored by the awards manager.
3. All necessary requirements are agreed to by the prospective centre/provider when applying for approval. The duty regarding accessibility of premises could be highlighted more. Approvals are renewed annually and a fresh centre certificate issued.
4. Candidates are registered by the centre during the training course but the amount of detail obtained is minimal (name and address). ITC First Aid Ltd is not collating sufficient data and could not respond to a request by the regulators for even the most basic information. The awarding body should look at the NVQ code of practice for guidance on the data it should be collecting.
5. Centres advise ITC First Aid Ltd of the courses they are running and, for a small fee, the awarding body advertises these on its website.
6. Successful candidates receive a certificate. Currently, the certificate design, including that for replacement certificates, is not in accordance with the regulators' requirements. Titles of qualifications on the certificates must be exactly as approved by the regulators and replacement certificates have to be clearly labelled as such.
7. ITC First Aid Ltd offers its qualifications overseas. The awarding body does not inform its clients that the regulators' logos only indicate that the qualification is accredited for England, Wales and Northern Ireland.

## Accreditation conditions

9. ITC First Aid Ltd must collate data about its centres and candidates (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 12).
10. ITC First Aid Ltd must ensure that the design of certificates meets the regulators' requirements. Replacement certificates should be clearly labelled as such (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 22).
11. ITC First Aid Ltd must inform its clients that the regulators' logos on the certificate indicate that the qualification is accredited for England, Wales and Northern Ireland (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 21b).

## Observations

8. ITC First Aid Ltd should harmonise its centre approval documentation.
9. ITC First Aid Ltd should review its centre definition, particularly for providers and in respect of internal verification arrangements.
10. ITC First Aid Ltd should make clearer its accessibility requirements for buildings.

## Malpractice

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 28–31.

### Findings

1. ITC First Aid Ltd publishes its malpractice policy (which includes procedures) on the awarding body's website and provides its centres with a printed copy. To date, no instances of malpractice have been identified by the awarding body or its centres.
2. The policy statement lacks any reference to reporting instances of malpractice to the regulators where invalid certification may have occurred. This is essential.
3. In addition, the definition of malpractice could be improved as the activities may not be 'illegal'. Similarly, whilst sanctions are covered in the policy to some extent, the reference to 'failure to cooperate', as set out in the regulators' criteria, could be usefully incorporated into the document.

### Accreditation conditions

12. ITC First Aid Ltd must report cases of malpractice to the regulators whenever it finds evidence that certificates may be invalid (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 31).

### Observations

11. ITC First Aid Ltd should consider re-wording its definition of malpractice and incorporating the reference to failure to cooperate into its policy and procedures on malpractice.

## Equality of opportunity, reasonable adjustments and special consideration

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 9 and 14–20.

### Findings

1. ITC First Aid Ltd has an equal opportunities policy and also an assessment policy document. Both of these documents are published on the website.
2. ITC First Aid Ltd deals with issues on reasonable adjustments as they arise but has no internal procedure on how they are to be handled and recorded. Consistency is only suggested because the awarding body is currently small enough in staff numbers for a single person to deal with all referrals. No log of issues submitted is created.
3. The awarding body advised the regulators that its assessment methods had been amended in 2007 when a policy review was carried out against the requirements of the Disability Discrimination Act. The regulators suggested that the awarding body should, in future, link its equality of opportunity policy to its procedure for setting the structure and content of its qualifications. This would minimise the need to make reasonable adjustments.
4. ITC First Aid Ltd allows its centres considerable, and undefined, scope to accommodate candidates' needs. This is commendable but the awarding body needs to ensure a standard approach across centres and therefore needs to control the activities by issuing guidelines. Centres are not required to record the decisions they make on reasonable adjustments and special consideration. ITC First Aid Ltd cannot monitor and evaluate the use of reasonable adjustments and special consideration.
5. ITC First Aid Ltd does not award an aegrotat since candidates must be proven competent by practical demonstration and the HSE insists on attendance at the training course for the qualification to be awarded.
6. The regulators were satisfied by conversations with head office staff and centres that the awarding body was aware of the need for fairness in its dealings with all candidates. They would neither create unnecessary barriers to achievement nor give candidates an unfair advantage.

## Accreditation conditions

13. ITC First Aid Ltd must publish to centres its procedures for making reasonable adjustments and special consideration including those that need to be referred to the awarding body and defining what centres may authorise (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 17 and 18).
14. ITC First Aid Ltd must put in place a procedure for the monitoring and evaluation of reasonable adjustments and special consideration (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 20).

## Observations

12. ITC First Aid Ltd should link its policies on candidate needs to its qualification development policy to minimise the need to make reasonable adjustments.

## Customer service

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 32 and 33b.

### Findings

1. ITC First Aid Ltd publishes its Customer Service Statement on its website but the regulators are not convinced that this ensures all candidates have access to it. They recommend that the awarding body should ensure this occurs.
2. The Customer Service Statement contains the required information. ITC First Aid Ltd has clear evidence that its quality of service is regularly and thoroughly tracked. Targets are displayed in the office and performance updated weekly. This was considered to be good practice.

### Accreditation conditions

There are no accreditation conditions for this section.

### Observations

13. ITC First Aid Ltd should consider ways to ensure that all candidates are aware of the Customer Service Statement.

## Enquiries and appeals

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 23–27.

### Findings

1. ITC First Aid Ltd states that it will report on enquiries and appeals through its annual performance report. ITC First Aid Ltd has not had any appeals against assessment or other matters to date.
2. The enquiries and appeals policy appears on the awarding body's website and is also included in centre documentation. ITC First Aid Ltd relies on the candidates either having access to the web or being provided with the policy by their centre. ITC First Aid Ltd should ensure that this occurs.
3. The appeals document is not entirely in accordance with the regulatory criteria's requirements. It could usefully be rewritten for greater clarity. The procedure lacks an independent element and has no independent review stage if the appeal goes through all the awarding body's processes without resolution. Indicative timescales need to be advised clearly to candidates at each stage of an appeal. Fees, as stated, are high, although the regulators understand that this is an unintended effect of the wording and the fees are in fact half that stated.

### Accreditation conditions

15. ITC First Aid's enquiries and appeals policy must be drawn up in accordance with the regulatory criteria, covering in particular:
  - independence
  - timescales
  - fees
  - independent review

(*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 25).

### Observations

14. ITC First Aid Ltd should ensure that its enquiries and appeals procedure is provided to candidates in all cases.

## Monitoring and self-assessment

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 33a, 34, 35 and 37.

### Findings

1. ITC First Aid Ltd has not yet produced procedures to monitor its compliance with the regulatory criteria. Discussions are still taking place with the regulators regarding the submission of a regular self-assessment report.
2. Procedures for monitoring its centres are still in their infancy. The required improvements, such as sanctions arrangements and appropriate visit frequencies, will go hand in hand with the changes to external verification mentioned earlier in this report in the section on internal assessment. Consequently, only an observation is made here to remind the awarding body of this aspect.

### Accreditation conditions

16. ITC First Aid Ltd must have procedures in place to monitor its compliance with the regulatory criteria (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 33a).

### Observations

15. ITC First Aid Ltd should include its arrangements for monitoring and taking appropriate action on its centres with its revised external verification procedures.