



# **Awarding body monitoring report for: The Waste Management Industry Training and Advisory Board (WAMITAB)**

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October 2009

Ofqual/10/4696



# Contents

Introduction .....	4
Regulating external qualifications .....	4
Banked documents .....	4
About this report.....	5
About WAMITAB.....	5
Corporate governance.....	6
Findings.....	6
Accreditation conditions.....	7
Observations.....	7
Resources and expertise.....	8
Findings.....	8
Accreditation conditions.....	8
Observations.....	8
Qualifications development: planning, content and design of qualifications.....	10
Findings.....	10
Accreditation conditions.....	11
Observations.....	11
Qualifications development: quality assurance of the qualifications development process .....	12
Findings.....	12
Accreditation conditions.....	12
Observations.....	12
Quality assurance and control of internal assessment.....	13
Findings.....	13
Accreditation conditions.....	15
Observations.....	15

# Introduction

## Regulating external qualifications

Responsibility for regulating external qualifications lies jointly with three qualifications 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 Waste Management Industry Training and Advisory Board (WAMITAB) was carried out by Ofqual and DCELLS on behalf of the regulators in May to September 2009.

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

- corporate governance
- resources and expertise
- qualifications development
  - planning
  - content and design of assessment
  - quality assurance of the qualifications process
- assessment arrangements
  - internal assessment.

The monitoring activities included desk research of information already held by the regulators and scrutiny of the WAMITAB website. The monitoring team visited the WAMITAB head office to conduct interviews with staff and review documentation. Observation also took place at one of WAMITAB's internal standing committees responsible for quality assurance and visits to two approved assessment centres that offer the WAMITAB Level 3 Certificate in Waste Resource Management vocationally related qualification to test the WAMITAB assessment and awarding procedures at centre level. An additional follow-up meeting with WAMITAB staff finally took place in September 2009. This report draws together the regulators' findings from these monitoring activities.

## **About WAMITAB**

WAMITAB is a recognised awarding body for the waste management industry in England, Wales and Northern Ireland and a joint awarding body with the Scottish Qualifications Authority for qualifications in Scotland. For further information on WAMITAB and its qualifications please see [www.wamitab.org.uk](http://www.wamitab.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. WAMITAB was last monitored in February 2005 as part of an Awarding Body Recognition Update with all accreditation conditions being met by September 2005. Since that time there have been no major or significant changes to its corporate governance arrangements.
2. WAMITAB is a company limited by guarantee without a share capital and remains a registered charity. It is presided over by a board of four directors, which provides the overarching strategic direction for the organisation. The board has delegated day-to-day operational responsibility matters to the Director general. A rolling five year business and budget plan 2006–2011 has been produced which details the budgeting process, key challenges, yearly and proposed work programmes for WAMITAB. This is reviewed annually. The board receives bi-monthly financial reports and an independent auditor audits the accounts on an annual basis, and these are presented to the board.
3. The Awarding body review group is a standing committee made up of industry, sector, professional and centre representatives, which advises, comments and provides feedback on the main areas of operational activity. It meets once every six months. This is seen by WAMITAB as providing the internal quality assurance and control oversight of its operations. Both board and awarding body review group members are required to declare any potential or actual conflict of interest before each meeting.
4. There are nine full-time members of staff, including the Director general, at WAMITAB. There is a flat organisational structure and all staff report to the Director general, who along with the Qualifications manager and the Business development manager make up the key personnel of the awarding body.
5. It is recognised by WAMITAB that the loss of any of the key personnel would have an immediate impact upon operations. The taking out of key persons insurance has been rejected by the board on cost grounds and the Director general stated that contingencies would be put in place should any such eventualities occur. These include the temporary covering of work by existing staff, appointing consultants or seeking board approval to appoint replacement staff depending on the length of absence.
6. The awarding body relies on job descriptions to detail the duties and responsibilities of all staff. Absent from the Director general's job description was the responsibility for sign-off for

each qualification developed. Also, given that the Qualifications manager is designated as the single point of accountability for maintaining the quality and standards of all qualifications, this duty and responsibility is not included in this job description.

7. WAMITAB has produced an avoiding conflicts of interest policy to manage differences between its awarding body function and other functions so that they do not constitute a barrier to access or a restrictive practice. This was activated in 2008 when WAMITAB, which also provides teaching for adult literacy and adult numeracy, sought OCR approval as a centre to manage this potential conflict of interest.
8. The monitoring team was notified that WAMITAB is currently working with external consultants to restructure the organisation and this is likely to result in significant organisational changes.

### **Accreditation conditions**

1. WAMITAB must review the job descriptions of the Director general and Qualifications manager to include the duties and responsibilities for sign-off for each qualification developed and the single named point of accountability (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 33a and 5b).

### **Observations**

1. WAMITAB should notify the qualifications regulators of the changes to its corporate governance arrangements once the organisational restructuring has taken place.

## 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. WAMITAB is not currently awarding its full suite of accredited qualifications. Existing staffing levels of nine full-time staff including a temporary employee are sufficient. However if WAMITAB were to extend or award all of its accredited qualifications staffing resources will need to be reviewed to take account of any additional requirements on staff time.
2. The awarding body has adopted an NVQ approach to the delivery, assessment and verification of the accredited VRQ. Internal verifiers are recruited and trained alongside external verifiers and have to achieve V2. Currently three external verifiers are qualified and three are working towards V2. One external verifier, an employee of WAMITAB is being trained for the skills for life qualifications.
3. Recruitment is by invitation. WAMITAB looks for its external verifiers to have the correct technical competence in waste management and understand the qualifications offered. The arrangements for recruiting and training external verifiers are suitable. WAMITAB supports its external verifiers through regular standardisation events, forum meetings with centres and one to one meetings with the qualifications manager if necessary. There is also an external verifier guidance document to support them in their role.
4. WAMITAB works closely with the relevant sector skills councils to develop qualifications. Additional expertise is brought in as required to support WAMITAB with these activities.
5. There is no formal staff appraisal process although the Director general stated that formal arrangements were being incorporated into the restructure. Any training needs are identified through discussion and agreed on an individual basis.
6. The awarding body has suitable technical resources and contingency plans to support its work. All data is archived and duplicated. One set is kept in a fire proof safe on its premises and the other is kept off site.

### Accreditation conditions

There are no accreditation conditions for this section.

### Observations

2. WAMITAB should review its staff resources if they extend or offer the full range of accredited provision.

3. WAMITAB should notify the regulators once the new formal arrangements for the staff appraisal process are in place.

## Qualifications development: planning, content and design of qualifications

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

### Findings

1. For the purposes of this section the monitoring team focused where necessary, upon the Level 3 Certificate in Waste and Resource Management which was accredited Autumn 2008.
2. Traditionally, WAMITAB has not developed qualifications on a planned basis for accreditation. The awarding body has tended to be directed by the emerging needs of the sector and government in developing qualifications to cover gaps in provision, particularly in response to reviews of National Occupational Standards (NOS) and legislation requirements. Given their lack of regular qualification development WAMITAB decided not to go for 5 day accreditation.
3. The content of the Level 3 Certificate was designed to meet the operator competency requirements of the Department for Environment, Food and Rural Affairs (DEFRA) and Welsh Assembly Government as specified in the Environmental Permitting Regulations 2007. The qualification provides one of the vocational pathways for demonstrating competence in relation to medium risk 'permitted' waste management facilities.
4. The Level 3 Certificate is an entirely unitised qualification containing five mandatory units and a sixth unit chosen from a range of options. The units are individually assessed by written tests. There is also a synoptic written assignment designed to demonstrate how the learning from all the units is implemented within the candidate's chosen waste management facility.
5. The Level 3 Certificate is a relatively new departure for WAMITAB and its development was modelled on previous NVQ activity such as unit titling, linkage to the appropriate NOS and assessment arrangements. The policy for developing qualifications has recently been finalised and for the monitoring team this meant there were limits as to how far they could explore the effectiveness of the processes articulated within the document.
6. In agreeing the specifications of the Level 3 Certificate WAMITAB brought together key stakeholders such as the Chartered Institution of Wastes Management (CIWM) and DEFRA. In the development of qualification content, unit and qualification levels, learning outcomes and assessment criteria WAMITAB utilised the expertise of assessors, internal and external verifiers and technical representatives.

7. As part of this development the monitoring team saw examples of communications between the awarding body and CIWM, DEFRA, other stakeholders and technical experts. Also viewed was the consultation carried out with the sector on the proposed qualification. In addition, the monitoring team was informed that the relevant sector specialists from QCA had been involved in the development and the sector skills council (SSC) Energy and Utility Skills had supported the accreditation of the qualification.
8. In the past WAMITAB has had little recourse to withdraw qualifications as the emphasis has been not to do so before the accreditation end date. Thus, there were no formal documented procedures explaining how the awarding body would deal with the withdrawal of qualifications.

### **Accreditation conditions**

2. WAMITAB must produce a rationale for considering the withdrawal of qualifications and develop suitable procedures so that all parties fully understand the required actions and candidates are not disadvantaged (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 44).

### **Observations**

There are no observations for this section.

## **Qualifications development: quality assurance of the qualifications development process**

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

### **Findings**

1. As previously mentioned WAMITAB has recently finalised a policy on the development of new qualifications that describes the process from initial planning through to Web Based Accreditation. The monitoring team would commend this as good practice in having a structured approach.
2. In relation to the final sign off of a qualification before submission on to the Web Based Accreditation it was not clear who was actually responsible. The process stipulated the Director general as accountable and 'Flowchart 2 – Qualification Development' designated the Awarding body review group as responsible. It was established that the Director general had the final responsibility.

### **Accreditation conditions**

There are no accreditation conditions for this section.

### **Observations**

4. WAMITAB should clarify the responsibility for final sign off for each qualification by amending 'Flowchart 2 – Qualification Development' from Awarding body review group to Director general.

## Quality assurance and control of internal 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. WAMITAB offers a range of accredited qualifications including NVQs and VRQs in Waste Management which are competence based. The monitoring team looked at the assessment methodology used by WAMITAB for the Level 3 Certificate in Waste and Resources Management accredited in 2008.
2. When new qualifications are launched the regulators expect awarding bodies to have suitable guidance and quality assurance arrangements in place to promote reliable and consistent results. This will include for example, information and guidance for question writers, assessors, verifiers, external verifiers and centres. The effectiveness of these procedures was tested through centre visits and the scrutiny of existing documentation.
3. WAMITAB uses its existing systems for NVQs to check a centre's quality assurance arrangements. These systems include a centre approval process and external verifier visits.
4. The monitoring team looked at examples of the guidance documents to support the Level 3 Certificate in Waste and Resource Management. Guidance documents included the VRQ marking strategy, assessment centre guidance and unit specifications detailing the learning outcomes, assessment criteria and evidence required. Additional guidance detailing the technical competence requirements for the VRQ written assignment is also provided.
5. Some of the guidance is not explicit and has posed issues for centres. For example, the VRQ marking strategy refers to possible variations in the distribution of marks for questions depending on the depth required but the unit tests do not show the marks to be awarded per question. This could lead to inconsistencies in the allocation of marks by assessors to questions. The sample end of unit test provided did not include a breakdown of marks per question. There is also no information on the extent work can be redrafted before it is assessed for the assignment.
6. The Level 3 Certificate in Waste and Resource Management has five mandatory units and an additional specialist unit. Each unit is assessed through an end of unit test under 'open-book' conditions, with a pass mark of 70%. In addition candidates complete a 3000– 4000 word written assignment based on a number of the learning outcomes from each unit. Assignments are a pass or fail only. Both forms of assessments are completed by an

independent assessor not the tutor. External verifiers are required to check this is adhered to during visits but it is not clear how this is carried out or recorded.

7. If candidates achieve less than 70% in the unit test, centres can request additional information to be submitted. It is not clear from the VRQ marking strategy what format this will take or how WAMITAB checks the additional information so that they are confident candidates have provided sufficient evidence. Centres confirmed that they had not received any written guidance on this requirement.
8. Centres also said that WAMITAB had allowed some candidates to complete the end-of-unit tests in their own time when the VRQ marking strategy indicates that the test should be invigilated. WAMITAB need to be clear about these requirements particularly if more centres are approved so that the approach to unit tests is consistent across centres.
9. It was noted during discussions with centre staff that while WAMITAB provided the written questions for each unit test they did not provide the answers. An example assessment format for unit 3 that included possible responses was provided during the monitoring visit and to centres. The monitoring team has some concerns about these arrangements. Firstly the consistency of answers between centres and how this is checked. Secondly centres are writing the possible responses so there is an issue about independence in the assessment process. Thirdly candidates completing tests in their own time without invigilation have an unfair advantage over candidates who are time limited and there is the potential for collusion in answering questions. However the monitoring team noted the policy on plagiarism seen during centre visits.
10. Candidates are required to sign a front sheet for the end of unit tests confirming authenticity but it is not clear if this is a requirement for the assignment as the guidance does not refer to an authenticity statement. The monitoring team noted that centres had devised their own arrangements to confirm authenticity for assignments.
11. WAMITAB has arrangements in place to monitor centres that includes external verification visits. Centres confirmed that these visits were both VRQ and NVQ. The monitoring team looked at a sample of completed external verifier reports but it was not clear if VRQs had been included. The format of the report does not differentiate between the types of qualifications and did not include the names of the candidates sampled.
12. There was evidence of postal verification for some VRQ portfolios and feedback via e-mail confirming that the candidates had achieved. However, WAMITAB allows direct claims status for VRQs and therefore candidate evidence and moderation of assignments would not be checked until the next external verification visit. It is difficult to see how WAMITAB can track the sampling of end of unit tests and sufficiency of evidence if this sampling is not

recorded and direct claims are allowed. WAMITAB needs to track the sampling of end-of-unit tests so that they can be confident the results are reliable.

13. WAMITAB uses its NVQ arrangements to monitor the performance of external verifiers which includes observed visits and scrutiny of completed reports. As the requirements of the VRQ are different WAMITAB needs to differentiate between the qualifications on the report so that external verifier performance can be monitored across both NVQs and VRQs.

### **Accreditation conditions**

3. WAMITAB must ensure that its systems and procedures produce reliable results (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 56).
4. WAMITAB must provide centres with suitable guidance on the suitability of additional evidence if a candidate achieves less than 70% in the unit tests (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 57b).
5. WAMITAB must ensure that assessment is consistent across centres and provide suitable guidance to support the marking of unit tests (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 59).
6. WAMITAB must provide guidance to centres on the re-drafting of work with particular reference to the assignment (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 60c).

### **Observations**

5. WAMITAB should review all VRQ guidance so that it is explicit in its requirements such as requiring candidates to confirm the authenticity of all evidence.
6. WAMITAB should review and amend the external verification report so that sampling is recorded and there is clear differentiation in the reporting of VRQs and NVQs.
7. WAMITAB should review its approach to external verification visits and reporting so that there is sufficient information to track the sampling of unit tests and assignments.
8. WAMITAB should review its rationale for allowing direct claims status for VRQs.
9. WAMITAB must review its approach to external verification visits and reporting so that there is sufficient information to track the sampling of unit tests and assignments.