

Qualifications and Curriculum Authority



## Post-accreditation monitoring report: The Council for the Advancement of Communication with Deaf People (CACDP)

September 2006

QCA/06/2930

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## Introduction

#### **Regulating external qualifications**

Responsibility for regulating external qualifications lies jointly with three regulatory authorities:

- Qualifications and Curriculum Authority (QCA)
- Department for Education, Lifelong Learning and Skills (DELLS), the body for Wales
- Council for the Curriculum, Examinations and Assessment (CCEA), the authority for Northern Ireland.

Following the accreditation of a qualification, the regulatory authorities 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 regulatory authorities 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 action plan will be agreed by the regulatory authorities and its implementation monitored.

The regulatory authorities 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.

#### About this report

This report is the outcome of monitoring of the Council for the Advancement of Deaf People (CACDP) awarding body by QCA on behalf of the regulatory authorities between May and July 2006. It describes the regulatory authorities' findings about the resources and expertise that support the delivery of qualifications, arrangements for the quality assurance and control of internal assessment and the level of customer service offered.

This is the second post-accreditation monitoring of CACDP's activities and it focuses on the National Vocational Qualifications (NVQs) in sign language and in interpreting between deaf and hearing people.

Consultants visited five centres in England and one in Northern Ireland. They interviewed staff, reviewed portfolios, examined records and collected information on customer service satisfaction. They also checked on centre compliance with the approved centre criteria and on the way CACDP manages the quality assurance and control of internal assessment. The centres chosen were in different regions, of varying size and of different types to ensure a good mix of external verifiers and centres. The findings from the visits were collated and the issues were followed up with the awarding body at the monitoring visit.

#### About CACDP

The CACDP NVQ qualifications are aimed at anyone who uses sign language or interpreting in the workplace. For more information about CACDP and the qualifications it offers visit the website at www.cacdp.org.uk.

### **Resources and expertise**

This is subject to the *NVQ code of practice* (2001), paragraphs 35, 52 (part), 53, 54 (part), 55 and 57; and *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (2004), paragraphs 8, 10, 97e and 98.

#### **Findings**

- CACDP has approximately 30 staff at head office and five of those support the delivery of NVQs as part of their jobs. The qualifications manager, who reports to the director of quality and standards, oversees the day-to-day work of the awarding body, manages the external verifiers and acts as the lead external verifier. Another member of staff is a qualified and occupationally competent external verifier and carries out external verifier duties and advises on qualification development.
- The awarding body's NVQ database, which includes information on centres, candidates and external verifier visits, is used to create reports on topics like the frequency of external verifier visits. Other databases support NVQ delivery and CACDP has an information technology consultant to make database amendments.
- 3. The staff supervision programme includes an annual summary meeting and quarterly reviews of performance, which links to business aims.
- 4. The awarding body requires its assessors, internal verifiers and external verifiers to have the knowledge, skills and experience as stated in the relevant assessment strategy. CACDP provides a post-approval pack, which contains this information and recognises that it needs to be updated to take account of the new qualifications starting in September 2006.
- 5. As there are a limited number of experts in this field external verifiers are recruited by recommendation or are targeted because of their skills. Awarding body staff said that they follow the CACDP recruitment process, which includes a formal application, two training days and shadow visits. The first training day concentrates on NVQs and awarding body systems while the second deals with the V2 requirements for unqualified external verifiers. Attending the training days does not guarantee acceptance as an external verifier. Qualified external verifiers accompany trainee verifiers and countersign their decisions until they achieve their V2 qualification.

- 6. There are suitable arrangements for maintaining the competence of external verifiers. Each year they attend a mandatory standards meeting and one standardisation day, and attendance is recorded on the database and monitored. The monitoring team saw the agendas for some of external verifier meetings and they included suitable topics like the awarding body's systems and the *NVQ code of practice*.
- 7. There is an external verifier code of conduct, which is due for revision in July 2006. The monitoring team noted that the code did not fully meet the regulatory requirements of the *NVQ code of practice* (2001). It does not have enough information on the roles and responsibilities of external verifiers, on the appeals process for centres that disagree with external verifier decisions or on declarations of conflicts of interest.
- 8. CACDP has eight external verifiers and one staff member who acts as an external verifier. Each external verifier inspects between three and seven centres.
- 9. Each external verifier's file includes information on their V2 status and occupational competence. CACDP staff said that all external verifiers are now qualified. The database records external verifiers' continuing professional development (CPD) but does not show the date when they started work. This means that the awarding body cannot tell if an external verifier has achieved the V2 standard within 12 months of commencing their verification role, which is a requirement of the *NVQ code of practice* (2001).

#### Accreditation conditions

- CACDP recording system must ensure that its recording system includes the initial date when an unqualified external verifier starts to perform external verification so that progress towards the achievement of V2 can be monitored. (*The statutory regulation of external qualifications,* paragraph 98 and NVQ code of practice, paragraph 54 (part))
- CACDP must review its external verifier code of conduct so that the regulatory requirements are met in full. It must include more detail on the roles and responsibilities of external verifiers, on appeals against external verifier decisions and on conflicts of interest. (*NVQ code of practice*, paragraph 55)

#### Observations

There are no observations for this section.

# The quality assurance and control of internal assessment

This is subject to the *NVQ code of practice* (2001), paragraphs 22-33, 36-51, 52(part), 54(part), 56, 58(part), 59-65, 66(part), 67-69 and *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (2004), paragraphs 13, 36, 56, 57 and 59-62.

#### Findings

- Approved assessment centres are given a centre handbook and a post-approval pack. The *Centre handbook* contains generic information about all CACDP centres, qualifications, policies and procedures. Centres receive additional information about the particular qualifications that they deliver and in the case of NVQs this comes in a separate post-approval pack.
- 2. The monitoring team examined the Level 3 and 4 NVQ in British Sign Language and BSL/English Interpreting 2005 – Post-approval pack. It includes information on the assessment strategy, national standards and assessor, internal verifier and external verifier roles and responsibilities. It also describes acceptable types of evidence and methods of achieving independent assessment.
- 3. The *Post-approval pack* is usually updated every January but this year the revision has been left until September to coincide with the introduction of the new standards.
- 4. The *Post-approval pack* also includes assessor and internal verifier recruitment criteria. Centre staff were clear about their roles and responsibilities and there was consistent evidence to show that unqualified assessors and internal verifiers are being supported and that their assessment decisions are being countersigned. There was good practice in centres demonstrated by training needs analysis having been undertaken for assessors and internal verifiers.
- 5. There was also evidence that centres hold standardisation meetings that are recorded and that external verifiers are checking these records.

- 6. The *Post-approval pack* contains clear guidance on what evidence is acceptable. The primary evidence for these qualifications consists of video clips and observation. Some simulation is used to meet confidentiality requirements, as the job roles of candidates working with deaf people are often of a confidential nature.
- 7. Independent assessment is achieved by an exercise set by the awarding body. Clear guidance is given on the procedure for the set task, which covers several elements across the units for the Level 3 and 4 NVQs. External verifiers confirm completion of the set task before signing a candidate's claim for certification. The set task is based on a scenario that is videotaped and on a discussion of a topic chosen from two options by the centre. The set task is subject to 100 per cent verification.
- 8. Evidence showed that independent assessment is being carried out within assessment strategy guidelines. The awarding body reported that the independent element has been an additional burden to candidates and centre staff. The National Centre for Languages (CILT) assessment strategy for the new qualifications, due to be implemented from September 2006, no longer requires an independent element.
- Candidates and assessors sign the candidate assessment record (CAR) to confirm authenticity of the evidence. The monitoring team saw examples of this during centre visits.
- 10. The *Centre handbook* includes guidance on record keeping. Most centres had assessment records available for scrutiny but some peripatetic assessors and internal verifiers carry the assessment records with them. This may leave the centre with incomplete records and could pose a security risk.
- 11. As well as the Post-approval pack, centres are provided with the Joint awarding bodies guidance on internal verification. Centres have asked for more guidance on sampling strategies and this topic became the focus of a recent CACDP internal verifier workshop. There are annual internal verifier workshops and CACDP also holds standards meetings each year, which centre staff must attend. The monitoring team considers that the level of support CACDP provides to centres and internal verifiers through workshops demonstrates good practice.

- 12. Because these qualifications are highly specialised, it is difficult to find occupationally competent and qualified assessment staff. There had been significant staff turnover at one centre since its approval and it was left without a qualified internal verifier. The centre that delivers the Irish Sign Language (ISL) NVQs currently uses a qualified internal verifier from a local college supported by an occupationally competent ISL user. CACDP recognises the difficulties faced by the centre and are monitoring the situation to ensure that assessment standards are acceptable. This type of arrangement should only be used as a stopgap but it is difficult to see how the situation could be improved in the short-term.
- 13. Another issue relates to an occupationally competent external verifier for the ISL NVQs. The external verifier for the ISL NVQs is occupationally competent in British Sign Language to level 4 and is also the CACDP qualifications officer for level 3 and level 4 BSL and ISL. This approach meets the requirements of the CILT assessment strategy, which states that: 'if the external verifier is not fully competent in the language assessed, an expert witness should be appointed, if necessary, to advise on issues related to levels of language competence'. CACDP intends to resolve this issue by recruiting an ISL external verifier from the next group of candidates going through the ISL NVQ.
- 14. Similar difficulties have occurred in obtaining suitably qualified external verifiers for other qualifications. CACDP has recently trained six new external verifiers who have achieved V2. Some centre staff said that they had received conflicting advice and this may reflect the fact that half of the external verifier team is new and inexperienced. CACDP recognises this may have occurred but is satisfied that the external verifiers are becoming more confident and consistent.
- 15. Centres receive two external verifier visits within a 12-month period and there are two types of visit. The purpose of an advisory visit is to check on the progress of incomplete portfolios while the purpose of a verification visit is to sample completed portfolios and sign certificate claims.
- 16. Centres must provide CACDP with the assessment records and claim forms before verification visits when certificate claims are to be signed off. This is so that checks can be made on things like assessor and internal verifier competence and countersigning. It is usual practice for this checking to be undertaken by the external verifiers but the time involved in verifying video evidence and the use of

interpreters, or communicating between the external verifier and centre staff in BSL, lengthens the process. CACDP is seeking to lessen the administrative burden on the external verifiers. The monitoring team was concerned that if a candidate has evidence ready for external verification at an advisory visit, the external verifier is unable to sign it off. The concern is that the candidate may have to wait a further six months until they can claim a certificate.

- 17. CACDP staff stated that, in certain circumstances, it is possible for portfolios to be verified through a postal or desktop verification, but this should only be used occasionally due to the unusually cumbersome nature of the evidence, ie videos. Centres were informed of this at internal verification training events in 2006.
- External verification reports are completed for all visits. The assessment team saw evidence of sampling and of the following through of actions from one visit to the next.
- 19. On the day of the visit, centre managers sign a section of the external verifier reports to confirm their agreement with any action points. After the visit, the full reports are sent to CACDP staff who review them before sending them to centres.
- 20. CACDP staff record centre visit action points on the NVQ database. This information is used to make annual risk assessments of centres but it is not clear whether there is more frequent monitoring of centres through the actions or if action timescales are met.

#### Accreditation conditions

There are no accreditation conditions for this section.

#### Observations

- 1. CACDP should consider reviewing its arrangements for record keeping for centres where there are peripatetic assessors so that complete records can be maintained at centres.
- 2. CACDP should review how it uses information obtained from centre visits so that. external verifier reports are the key component of its ongoing monitoring of centres.

## **Customer service**

This is subject to the *NVQ code of practice* (2001), paragraphs 1, 2, 80, (part) and 81 (part); and *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (2004), paragraphs 32 and 33b.

#### Findings

- Findings from centre visits were positive about the level of service offered by CACDP. The main issue identified by centre staff was the lack of a DVD for the Level 3 BSL standard. This would remove the difficulties posed by the existing standards for candidates whose first or preferred language is BSL. CACDP has acknowledged this problem and is developing a DVD for Level 3 BSL. DVDs are already available for Level 1 and 2 BSL.
- 2. CACDP regularly monitors its customer service targets, which include the length of time it takes to provide certificates and external verifier reports. The awarding body identified that between January 2005 and December 2006 and from January to July 2006 it did not meet some targets within the published timescales. The timescales for certificates performed well. However, the timescale of four weeks for the receipt of external verifier reports was the worst performer, as the turnaround time at the awarding body was delaying the achievement of its target. The awarding body is exploring the reasons for this with its customer service team.
- CACDP sends the *Centre handbook* and the *Post approval pack* to all centres. These documents contain all the necessary information to enable centres to deliver the qualifications they offer.

#### Accreditation conditions

There are no accreditation conditions for this section.

#### Observations

3. CACDP should investigate why it is not meeting its customer service targets and consider how it can help its external verifiers to meet deadlines.