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Post-accreditation monitoring report

Qualifications Network (QNUK)

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Introduction

Regulating external qualifications

Responsibility for regulating external qualifications lies jointly with three regulators:

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

Following the accreditation of a qualification, the regulators systematically monitor awarding organisations 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 organisation is found not to comply with relevant criteria, the regulators set conditions of accreditation. Even if an awarding organisation is compliant, the monitoring team may make observations on ways that the awarding organisation 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 organisations 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 organisations to inform decisions on the re-accreditation of qualifications, or if necessary, the withdrawal of accreditation.

Banked documents

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

A suite of documents has been identified as suitable for banking and are those that are considered to be the most crucial in supporting an awarding organisation's ability to operate effectively. To maintain the currency of the banked documents, awarding organisations are responsible for updating them as and when changes occur. They

are also reminded to review them at least annually as part of the self-assessment return.

About this report

This report is an outcome of post-accreditation monitoring activity for the QNUK awarding organisation and was carried out by Ofqual on behalf of the regulators in January 2010. It draws together the regulator's findings on areas of:

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

This is the first post-accreditation monitoring activity on QNUK. QNUK was recognised in 2006 through the Awarding Body Recognition Accreditation (ABRA) process for which there are no outstanding accreditation conditions.

The monitoring activities included desk research of information already held by the regulators, the ABRA submission and scrutiny of the website. The monitoring team visited QNUK's head office to conduct interviews with staff and review documentation. They also visited centres to check how the awarding organisation's quality assurance systems worked in practice.

About QNUK

QNUK provides access to one vocationally related qualification in personal effectiveness. For more information on QNUK and the qualification offered, visit the website at www.qualificationsnetwork.co.uk.

Corporate governance

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (QCA/04/1293)*, paragraphs 5, 6 and 7.

Findings

1. QNUK is a limited company. It is a small organisation comprising of two directors who own the company, a qualifications manager and an exams administrator. While the organisational chart shows other roles, these are either vacant or contract staff who are used on an ad hoc basis when required.
2. No committees or groups that support the work of the awarding organisation are shown on the organisational chart. Staff confirmed that a review committee had recently been established to write the multiple-choice questions for the examinations. However, there were no documents or terms of reference to explain its make up, the expertise required or the roles and responsibilities of this committee.
3. There are no documents explaining the governance arrangements. The single named point of accountability for maintaining the quality and standards of all qualifications was confirmed as the finance and operations director who reports to the managing director. Both own the company. QNUK did not inform the regulators of the change in ownership or the named point of accountability, which happened in 2008. Consequently, Ofqual's requirements for QNUK to complete a self-assessment were not met, as the information was sent to a previous employee. Other members of staff report to the finance and operations director.
4. The regulators require awarding organisations to have transparent governance, organisation and management arrangements. The current arrangements are not clear. There is much confusion in the published documentation and on the National Database of Accredited Qualifications (NDAQ). Reference is made to training and internal assessment when the qualification is independently assessed. The regulators accept that the policies and procedures and examinations were inherited from previous staff, but no evidence was provided that showed how the organisation was functioning prior to 2008. For example, how policies and procedures or examinations were developed and agreed. It was noted that QNUK is developing quality procedures for its ISO 9001 accreditation, which include awarding organisation functions. A draft copy was seen.
5. The finance and operations director is responsible for all operational issues in addition to being the single named point of accountability. However, the current job specification is generic for both directors and does not specify who has this

responsibility. The regulators noted that role responsibilities for both directors included an emphasis on monitoring teaching and learning, which is not an awarding organisation role.

6. The regulators explored why the current accredited qualification was different to the qualifications initially identified during the awarding organisation recognition process. QNUK confirmed that the sector skills council responsible for supporting childcare qualifications was not in place at this time. QNUK had seen a gap in the market for personal effectiveness and developed the QNUK level 2 Certificate in personal effectiveness (seven habits) instead. Also, the qualifications initially proposed are now accredited through other recognised awarding organisations.
7. Further discussion about the accredited qualification raised some concerns for the regulators. The accredited qualification is based on the material in a specific book. QNUK confirmed that it had permission from the author to use this material to develop the qualification. Much of the material is the basis of a course run by a national training company that also developed the teaching and learning materials. The regulators looked at some of the facilitator materials during centre visits and noted that the national training company had developed a syllabus with modules and learning outcomes. It is not clear if this syllabus is the same as the syllabus provided to the regulators by QNUK.
8. The qualification specification recommends that tutors attend a one-day facilitator's course and that resources are available from the national training company. There is no reference to any other recommended materials. Approved centres are directed to the national training company on the QNUK website as its learning and resources partner. Dates for facilitator training days are also listed.
9. This poses two issues. Firstly, it appears that to deliver the qualification successfully, approved centres have to attend a facilitators' day provided by the national training company, purchase their resources and be licensed at an additional cost to the centre. Secondly, all assessment is based on a book written by an associate of the national training company and additional training materials. If centres do not have access to the relevant materials, they may not fully understand the concept of and delivery of the seven habits. QNUK confirmed that centres do not need to use the materials from the national training company or attend the facilitators training day. They reiterated that the publication is available from bookshops. However, it is difficult to see how centres could gather sufficient information about the content of the qualification to deliver it successfully without the additional materials provided by the national training company. Evidence from the centres visited confirmed that the accredited qualification could not be delivered without these materials.

10. Two centres visited stated that they were required to attend a facilitator day run by the national training company at a specific cost before they were given centre approval by QNUK. Some staff trained as master facilitators so that they could train staff in-house. However, this training resulted in additional costs as the centre had to purchase licences for these members of staff before the qualification could be delivered. The awarding organisation confirmed that this is incorrect and that attendance on facilitator days is only recommended, centre approval is not dependent on this. The costs relating to facilitator days and licences are determined and managed by the national training provider, not QNUK.
11. At one centre, the annual report referred to the accredited qualification as belonging to the national training company. It is clear to the regulators that there is much confusion at centre level surrounding the actual ownership of the accredited qualification and QNUK must clarify the current situation.
12. The existing arrangements with the national training provider are informal, but QNUK must review these and explain fully the relationship so that it can identify and manage any current or future potential conflicts of interest.
13. Due to the location of the awarding organisation's offices in Scotland, most meetings are conducted by telephone. The regulators looked at examples of minutes. These did not clearly identify any reporting arrangements or reference to awarding organisation activities. It is difficult to see how QNUK will be able to monitor itself against the statutory regulations if it does not include awarding organisation functions as part of the agenda items.
14. QNUK benchmarked its fees against other organisations providing level 2 qualifications with similar guided learning hours (GLH) to ensure its fees were reasonable.
15. The monitoring team was given full access to all available awarding organisation documentation, including the executive summary, examination papers and minutes of meetings.

Accreditation conditions

1. QNUK must document fully its governance arrangements. This must include the make-up, remit and roles and responsibilities of any groups or committees (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 5a).
2. QNUK must formally inform the regulators of the changes to ownership and governance (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 6a, i and iii).

3. QNUK must provide a written statement clarifying its relationship with the national training company so that it is clear how potential conflicts of interest will be managed (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 5d).

Observation

1. QNUK should amend the job specification for the finance and operations director to include the role of single named point of accountability with responsibility for maintaining the quality and standards of all qualifications.

Resources and expertise

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 8 and 10.

Findings

1. QNUK has four staff to support the delivery of its accredited qualification, which is sufficient for the current activity. Two are directors. One takes responsibility for marketing and the other deals with operational issues. The qualifications manager is responsible for awarding organisation functions. There is a part-time exams administrator who works additional hours if required. Additional members of staff are employed as and when required. The regulators noted that none of the full-time office staff has any awarding organisation experience. However, QNUK confirmed that they do have access to a consultant if required.
2. There is a staff appraisal process consisting of quarterly reviews, which are linked to finance and customer service targets. The regulators looked at a sample review, which confirmed that the procedures were followed.
3. There are no documented arrangements for recruiting and training item writers or the expertise requirements for these individuals. QNUK has informal arrangements with a senior lecturer, two members of staff from the national training provider and one from a college to increase the number of items in the item bank. They will form part of the review committee to check the questions submitted. Most of this is done by telephone and/or email, but there are no written procedures supporting the process.
4. QNUK has some technical resources to support the delivery of its accredited qualification, but the database requires manual input. It does not provide the awarding organisation with for example the candidate's overall mark when the unit marks are submitted or the facility to generate statistical analysis on the performance of questions.
5. There are contingency plans in place with an external company, which will provide working space if the office is not available. Data is backed-up daily off-site.

Accreditation condition

4. QNUK must ensure that item writers have the relevant expertise, training and guidance to fulfil their role (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 10a and 10b).

Observation

2. QNUK should review the capability of its database to assist in the automatic generation of data.

Quality assurance and control of independent assessment

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 13, 36, 38–42 and 56–58.

Findings

1. QNUK has a single qualification consisting of two units. Each unit is assessed using a multiple-choice question paper consisting of 20 questions. All questions are in English and there have been no requests for assessment in Welsh or Gaeilge. The questions are set by QNUK. Different papers are prepared for candidates under 16 years of age.
2. Pre-printed papers and answer sheets are sent to centres on request, together with instructions on secure storage of the papers and invigilation instructions. The answer sheets and papers are returned to QNUK for marking.
3. At the time of monitoring, there were only three available papers for each unit. This raises some concerns. Firstly, 750 candidates have achieved the qualification and there are over 2,000 candidates registered for future assessments. Secondly, resits are allowed, but there is no documented policy confirming if there is a maximum number of resits. Centres confirmed that the registration fee allows for one free resit with a small charge for further resits. The monitoring team considers that three papers are insufficient for this volume of candidates as questions could be memorised for resit papers.
4. Information in QNUK's recognition application on NDAQ and in centres indicates that marking is done by electronic scanning. While the form is designed to allow this, the papers are marked by hand. All papers are stored by the awarding organisation on its premises. As the qualification has not been running for a full year, it was not possible to test QNUK's systems for monitoring provision over time. QNUK said that it intended to use these completed papers to start this process.
5. The regulators asked if there was any auditable evidence of how the existing items on the multiple-choice question papers had been created, but there were no records to support this activity. Plans are in place to establish a review committee to create additional questions. There was, however, no evidence to show that the work of question writers had been monitored. It is a regulatory requirement that assessment tasks (in this case, the multiple-choice questions and answers) are evaluated by appropriately qualified individuals not involved in their development. The awarding organisation confirmed that it had inherited the question papers in their current format.

6. The regulators looked at the existing papers and found fault with some of the questions. For example, where the same question appeared in two separate papers, there were two different answers. In another question, there was more than one correct answer. Centres visited also raised concerns about the ambiguity of some questions.
7. The qualification is based on a specific book and without having read and learnt the jargon of this publication, it would not be possible to answer the multiple-choice question paper. The regulators considered that plain language was not being used. Candidates or their centres needed to buy this book to understand the requirements of the qualification. Added to this is the requirement for tutors to attend an invigilators course prior to delivering the qualification. This is restrictive practice.
8. QNUK has not documented its procedures for confirming candidate identity. While centres are required to confirm identity, the awarding organisation did not provide any guidance on how this should be done. For candidates under the age of 16, this could pose a problem as they would not hold many of the usual forms of identity, such as driving licences.
9. The awarding organisation said that it was aware of potential conflicts of interest, but did not record this information or require contracted staff to declare conflicts of interest.
10. In the absence of fuller procedures and systems, QNUK could not be sure that it was producing results that were reliable.

Accreditation conditions

5. QNUK must have procedures in place to monitor the work of its examiners (question writers and checkers) and markers so that work can be reallocated if required (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 36).
6. QNUK must ensure that its systems and procedures produce reliable results. For example, by increasing the number of questions and papers for the volume of candidates (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 56).
7. QNUK must ensure that the qualification is assessed consistently and not issue different examination papers to candidates because of their age for the same accredited qualification (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 57b).
8. QNUK must ensure that questions and answers for the multiple-choice question examinations are checked for plain language and accuracy, and not require

candidates to understand the jargon of a particular publication (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 38).

9. QNUK must ensure that assessment tasks (questions) and mark schemes are evaluated by appropriately qualified individuals who have not written them (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 58d).

Observations

3. QNUK should formalise the guidance given to centres on confirming the identity of candidates.
4. QNUK should ensure that it has a system that requires potential conflicts of interest to be declared and that the information obtained is capable of being used.

Determination and reporting of results

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 63–67.

Findings

1. QNUK had set the pass mark for its qualification at 65 per cent across the two units by benchmarking it against similar qualifications elsewhere. The awarding organisation could not show that results were based on sufficient evidence as it had not mapped the questions in the examination paper to the specification, which in itself was not very detailed. As a result, it was not possible to see that the evidence of competence was sufficient to meet the required standards.
2. All records of assessment for multiple-choice question papers are kept at the awarding organisation. Assessments started less than 12 months ago and no analysis of the results in terms of comparability over time has been done. QNUK stated that 750 candidates would not generate sufficient data. The regulators expected to see evidence of the comparison of standards across papers set or a procedure/policy for doing so, but neither was available. The regulators asked for basic information such as the average mark to date, but this had not been calculated.
3. The regulators looked at the systems for recording marks and calculating the overall result. The procedure is manual and the staff member had to use mental arithmetic to calculate the results. This has the potential for human error as calculations and the inputting of marks were not always checked. Where this had taken place, it was not fully recorded.
4. There was no record of the checks made on the production of the existing multiple-choice questions and the regulators found an apparent error in one of the mark schemes. In another, there appeared to be more than one correct answer. The assessments were not entirely accurate or consistent. QNUK must report on this to the regulators. The awarding organisation must ensure that if a candidate fails because of errors in the multiple-choice question papers, this would be identified and the overall result reviewed and amended where necessary. Records of any amendments must be kept. The results of all candidates who may be affected must also be reviewed.
5. The regulators asked for clarification of the pass mark being '65 per cent across the two units'. Was each unit a minimum of 65 per cent or was it sufficient for the sum total across the two units to be 65 per cent? In this latter case, how was a unit certificate awarded?
6. QNUK showed the regulators two papers on this subject, but the more up-to-date version still had inconsistencies in it. Results sheets seen during centre

visits confirmed that QNUK were recording 12 successful questions per unit as a fail and 13 as a pass. However, some candidates passed the overall qualification even though they had failed the one unit. The regulators could not be confident that candidates had produced sufficient evidence to meet the standards if there is no minimum pass mark for each unit.

7. QNUK had different papers for candidates depending on their age. Nevertheless, all candidates received the same qualification. The regulators thought that this might just be due to the changes in the language of the questions to allow for the greater maturity of older candidates, but the papers contained different questions. The regulators could see no justification for this.

Accreditation conditions

10. QNUK must review and set the pass mark so that it can be confident that candidates have provided sufficient evidence across both units to achieve the qualification. In addition, it must ensure that results are determined on the basis of sufficient evidence and that markers are provided with technical and professional support to secure accurate judgements (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 63a and 63b).
11. QNUK must make sure that assessments are accurate and consistent. Multiple-choice questions must have only one indisputably correct answer and all results input to the computer system must be checked and supported by an audit trail. Where errors that would result in a pass are identified and affect failed candidates, this must be corrected and candidates advised (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 63e).
12. QNUK must clearly state how results will be aggregated to arrive at overall results. The mark required to issue a unit certificate must be clarified (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 65).

Observations

7. QNUK should analyse its existing data to see if there are any significant differences between papers.
8. QNUK should justify why it has different examination paper content for different ages.

Registration and certification

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 11, 12, 21 and 22.

Findings

1. QNUK has a fairly comprehensive centre approval application form. It covers issues such as access to premises for candidates and also the right of entry for itself and the regulators. However, it fails to identify the single named point of accountability for the quality assurance and management of the qualification despite requesting details of who fulfils five other job roles at the centre. In addition, there is no question about partnership arrangements between organisations.
2. QNUK requested data on its centres and candidates, but unusually, not the gender of candidates. The details are taken from the back of the answer sheet completed by the candidate when sitting the multiple-choice question paper. These details are entered manually into the computer even though the paper is designed for optical scanning.
3. QNUK offers certification outside of England, Wales and Northern Ireland, but does not inform its clients that the regulators' logos on the certificate indicate that the qualification is only accredited for England, Wales and Northern Ireland.
4. The certificate that QNUK issues for its qualification did not meet the design requirements set out by the regulators. This was because the sole signatory was not that of the awarding organisation's single named point of accountability for maintaining the quality and standards of all qualifications. No unit certification specimen was available and none had been produced to date.
5. For the reasons stated elsewhere in this report on Quality assurance and control of independent assessment, the regulators could not be certain that mistaken certification could not occur. Procedures for certification were required that safeguarded against this happening.

Accreditation conditions

13. QNUK must ensure that it identifies the single named point of accountability for the quality assurance and management of the qualification at each centre. In addition, it needs to ensure that if a centre is in a partnership arrangement with another organisation, the centre documents the respective roles, responsibilities and accountabilities of each partner, with clear lines of communication between the partners (*The statutory regulation of external*

qualifications in England, Wales and Northern Ireland (QCA/04/1293), paragraph 11).

14. QNUK must inform its clients that the regulators' logos on the certificate indicate that the qualification is only accredited for England, Wales and Northern Ireland (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (QCA/04/1293), paragraph 21*).
15. QNUK must ensure that the design of certificates meets the requirements set out by the regulators in appendix 5 of the statutory regulations. Written and improved procedures are also required to guard against mistaken certification (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (QCA/04/1293), paragraph 22*).

Observation

9. QNUK should collate data that includes the gender of its candidates. This data should be analysed on a regular basis.

Malpractice

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 28–31.

Finding

1. QNUK has a malpractice and misconduct policy that contained almost all of the required detail. The only omission was that it did not make clear to its centres that failure to cooperate can lead to certificates not being issued and future entries not being accepted.

Accreditation condition

16. QNUK must make clear to its centres that failure to cooperate can lead to certificates not being issued and future entries not being accepted (*The statutory regulation of external qualifications in England, Wales and Northern Ireland*, paragraph 29).

Observations

There are no observations for this section.

Equality of opportunity, reasonable adjustments and special consideration

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 9 and 14–20.

Findings

1. QNUK has a stand-alone equal opportunities policy. Reasonable adjustments and special consideration are in a separate policy. Both policies cover the majority of the regulatory criteria, but there is some confusion in the use of the terms 'special consideration' and 'reasonable adjustments'. A reasonable adjustment is usually decided before assessment takes place. Special consideration is usually applied at or after assessment. QNUK must be consistent in its usage of these terms, which are not interchangeable.
2. Although not linked to the examiner's duties, the two policies correctly stress the need to assist candidates while ensuring the validity of assessment remains intact. However, the equal opportunities policy needs to be linked clearly to the item writer's duties when creating qualifications and assessments. For example, it could be included in the guidance to developers when setting the structure and content of qualifications.
3. QNUK also needs to ensure, at the qualification development phase, that associated tasks and assessment consider the needs of all potential candidates so that the need to make subsequent reasonable adjustments is minimised.
4. QNUK sets out what delegated authority centres have in respect of reasonable adjustments and that records need to be kept. However, the types of records required and the conditions for eligibility are not explicit. In addition, the current arrangements require centres to submit evidence of any reasonable adjustments they grant with the answer paper. The awarding organisation then reserves the right to refuse the reasonable adjustments allowed. This is unfair to candidates. QNUK needs to review these arrangements and consider how reasonable adjustments are agreed so that candidates are not disadvantaged after the examination.
5. Awarding organisations are required to have a policy for special consideration that sets out the conditions of eligibility and application procedures for candidates who suffer temporary illness or indisposition at the time of assessment. QNUK has a policy that explains the circumstances in which a candidate can access special consideration, but then asks them to apply before the assessment, which is incorrect. In addition, the timeframe for applying after the assessment is not specified.

6. Awarding organisations are not obliged to award an aegrotat, but they must specify what the minimum evidence requirements are for awarding the qualification. QNUK must publish a statement on this subject.
7. QNUK had no written procedures in place to monitor and evaluate the use of reasonable adjustments and special consideration.

Accreditation conditions

17. QNUK must review its equality of opportunities policy so that it includes reference to how, during the development phase and arrangements for assessment and awarding, it ensures access and equality of opportunity while maintaining the integrity of the qualifications. The policy must also ensure that current legislation is taken into account, that the development process does not create unnecessary barriers to achievement and it must guarantee fair assessment for all candidates, including those with particular assessment requirements (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 9).
18. QNUK must consider the needs of all potential candidates when developing qualifications so that requirements for reasonable adjustments for candidates who have particular requirements are minimised at a later date (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 14).
19. QNUK must review its existing policy for reasonable adjustments, particularly the refusal of reasonable adjustments after the examination when it had authorised centres to make these adjustments. It must be clear to centres what records should be kept and the timelines for applying for reasonable adjustments (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 17).
20. QNUK must review its policy for special consideration so that centres are clear about the timeframes for applying for special consideration post-examination (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 18).
21. QNUK must consider if it will award an aegrotat award for this qualification or if all the assessment requirements have to be met. If after consideration QNUK decides to award an aegrotat it must specify the minimum evidence required to make the award (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 19b).
22. QNUK must have procedures in place to monitor and evaluate the use of reasonable adjustments and special consideration (*The statutory regulation of*

external qualifications in England, Wales and Northern Ireland (QCA/04/1293), paragraph 20).

Observation

10. QNUK should clarify the difference between making a reasonable adjustment and special consideration.

Customer service statement

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 32 and 33b.

Findings

1. QNUK has published its customer service statement. Centres receive a copy and it is available on the website. However, it is not clear how candidates will access the customer service statement or provide feedback to the awarding organisation.
2. The customer service statement meets the requirements of the regulators. QNUK confirmed that it asked centres for feedback on the exams and forms in November 2009 via an online survey provider, but had minimal responses.
3. QNUK does monitor its targets through the staff quarterly review process and by checking emails and the database, but this is not formally recorded. The finance and operations director confirmed that monitoring customer service targets was included in the quality procedures under development.

Accreditation conditions

There are no accreditation conditions for this section.

Observations

11. QNUK should ensure that candidates have access to or are directed to where the customer service statement is published.
12. QNUK should document its procedures for collecting and monitoring its performance against customer service targets.

Enquiries and appeals

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 23–27.

Findings

1. QNUK has published its enquiries and appeals policy in the *Centre procedure guide* and on the website, but does not state the fees for enquiries or appeals. The policy does not fully meet the regulatory requirements and confuses complaints with appeals. In addition, the arrangements refer to exhausting the centre appeal's process before appealing to QNUK. This is not relevant to independent assessment that is marked by the awarding organisation and therefore appeals must be made to QNUK.
2. Awarding organisations are required to include an independent person in the decision-making process who has not been involved with them in the past seven years. QNUK's appeals arrangements include an independent person during the committee stage and also at the final review stage.
3. The regulators require awarding organisations to have arrangements to deal with unresolved appeals. It is not clear how QNUK will put an unresolved appeal to independent review.
4. There are clear arrangements to check the accuracy of other candidate results if an appeal affects other candidates in the same cohort.
5. There are no documented procedures in place for monitoring, evaluating and reporting annually on its enquiries and appeals arrangements.

Accreditation conditions

23. QNUK must review its appeals policy so that it is clear when a candidate can appeal to the awarding organisation and the associated fees (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 25d).
24. QNUK must explain how an unresolved appeal will be put to independent review (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 25e).
25. QNUK must develop procedures for monitoring, evaluating and reporting annually on the operation of its enquiries and appeals arrangements.

Observation

14. QNUK should distinguish between complaints and appeals.

Monitoring and self-assessment

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 33a, 34–35 and 37.

Findings

1. QNUK has not yet submitted any self-assessment reports to the regulators. Further discussion revealed that the formal request from Ofqual for a self-assessment return had been sent to a staff member who had left. The awarding organisation has not carried out an evaluation of its compliance with the statutory regulations to date. If QNUK had started this process earlier, it may have identified some of the significant issues noted by the regulators during this monitoring activity.
2. Centres complete an annual return, which QNUK can use to identify specific issues in terms of its customer service. However, there is no mechanism for candidates to feedback about the qualifications to maintain or improve quality.

Accreditation conditions

26. QNUK must develop and implement procedures to monitor its compliance with the regulatory criteria (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 33a).
27. QNUK must provide opportunities for candidates to contribute to its self-monitoring arrangements (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 34).
28. QNUK must submit self-assessment reports to the regulators as required (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 37).

Observations

There are no observations for this section.

The qualifications regulators wish to make their publications widely accessible.
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