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Post-accreditation monitoring report

Vocational Training Charitable Trust (VTCT)

November 2009

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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. In order 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 at the time of completion of the self-assessment return.

About this report

The monitoring activity for the Vocational Training Charitable Trust (VTCT) was carried out by Ofqual on behalf of the regulators in October 2009.

This was a focused monitoring activity. It included testing against the Awarding Body Application for Access to the 5-day Accreditation Process.

The monitoring looked at the regulatory criteria relating to the following key areas:

- corporate governance
- resources and expertise
- qualifications development – planning, design and content of qualifications
- quality assurance of the qualifications development process
- quality assurance and control of assessment.

The monitoring activities included desk research of information already held by the regulators, including the banked documents, and scrutiny of the VTCT website. The monitoring team visited the VTCT head office in Eastleigh to conduct interviews with staff and review documentation.

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

About VTCT

VTCT has been in existence for over 40 years. It is a specialist awarding organisation for the hairdressing and beauty sector with a full qualification package covering hairdressing and beauty therapy, complementary therapies, sports and active leisure, and business skills. For further information, see www.vtct.org.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. Since it was last monitored in 2005, VTCT has undergone significant change in its senior management and organisation structure. This in turn has led to organisational priorities, policies and procedures being reviewed. Many have changed.
2. VTCT was recognised as a Diploma awarding body (DAB) and a component awarding body (CAB) to deliver the Diploma in hair and beauty studies in 2007, with effect from September 2009. The monitoring team discussed the readiness of VTCT to operate as a DAB and CAB. These findings will be taken forward separately to inform the ongoing programme of monitoring for Diploma awarding organisations.
3. VTCT is a company limited by guarantee and a charity. The Board of Trustees has overall responsibility for ensuring that VTCT meets charity commission and awarding organisation regulators' requirements. Day-to-day responsibility is delegated to the chief executive. The trustees have five business meetings a year with a standing agenda that includes a report from the chief executive.
4. There are four main committees reporting to the Board of Trustees. These are risk and audit; charitable giving; human resources and remuneration; and investment. There is also the education and vocational advisory committee (EVAC). The terms of reference for EVAC is currently under review and VTCT intends this to become a qualifications consultation group made up of key stakeholders.
5. The members of the senior management team (SMT) are all new in post (within the last 18 months). The most recent appointment is that of the chief executive who took up the post in March 2009.
6. The SMT is made up of the chief executive, the director of operations and the director of business development. The chief executive is confirmed as being the single point of accountability for the awarding body. The SMT meets informally throughout the week with more formal meetings held on Fridays.
7. The management team is made up of 11 managers from across the organisation. This includes managers from human resources, finance, qualifications development, quality assurance, marketing and customer service, centre administration, ICT as well as the chief examiner and chief verifiers.

Management meetings consisting of all members of the management team and SMT are held monthly.

8. The new organisation chart and revised job descriptions for key staff were available to the monitoring team. These are required to be submitted to Ofqual for the purposes of banking. It was noted that the job description for the chief executive did not refer to the responsibility of being the single point of accountability. The job description must be amended to specify that the role includes responsibility for maintaining the standards and quality assurance of accredited qualifications.
9. The monitoring team reviewed the other banked documents that were last submitted to Ofqual in April 2008. It was noted that the job title of the quality assurance manager had changed and that many of the documents required updating to reflect this.
10. VTCT has an agreement with Edexcel to jointly market the principal learning in hair and beauty studies. This is currently dormant, with all potential candidates being registered directly through VTCT centres. VTCT remains the awarding organisation. This is reported on separately as part of ongoing Diploma monitoring.
11. VTCT has a rolling strategic plan, currently covering 2008–11. The strategic plan is reviewed annually to form a more focused business plan. VTCT is working towards a clearer separation of the two plans.
12. VTCT has a corporate risk management policy in place (version 2.0, 23 July 2009), to provide a framework for its approach to corporate risk management. It is applied to the management of all risk associated with VTCT's business activities. The chief executive has responsibility for the day-to-day management of corporate risk and is the named plan coordinator.
13. The development and production of the business continuity management policy was an acknowledgement to ensure this covers all risks and those specifically associated with the Diploma.

Accreditation condition

1. VTCT must ensure that the job description for the chief executive includes responsibility for maintaining the standards and quality assurance of its accredited qualifications (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), criterion 5b).

Observation

1. VTCT is required to submit the new organisation chart, current job descriptions for key staff and any updated policy documents required for the purposes of banking.

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. VTCT has experienced considerable growth since 2005, increasing staffing levels from 25 to 41. A new job evaluation, grading and appraisal scheme has also been implemented. The scheme was trialled and evaluated prior to implementation, the outcomes of which are now linked to strategic priorities. Teams work together to develop objectives, linking them with core values and organisational priorities. From these, individual staff targets are set and development needs identified.
2. A point of good practice is that all members of staff are encouraged to work towards a qualification as part of their development. This is currently in the three main areas of customer service, management and IT.
3. In reviewing its organisational priorities and capabilities, VTCT recognised the need to secure expertise to accommodate new areas of work, such as the Diploma. The recent appointment of a chief examiner/moderator to manage external assessment, together with a programme of recruiting examiners, puts them in good stead.
4. Another area of change has been the appointment of regional centre advisers. The role of these field-based members of staff is to allow VTCT to become more responsive to its customers.
5. There are three chief verifiers who are established full-time members of staff. VTCT contracts further with nine senior verifiers and approximately 60 local verifiers. New verifiers come from within the sector following advertisements in VTCT bulletins. Applicants are shortlisted and interviewed. All verifiers are required to maintain their continual professional development, which is recorded. They are expected to attend two standardisation events per year plus a weekend meeting. VTCT is introducing a formal performance management system of verifiers by chief verifiers. Part of this will include an annual accompanied visit either with the chief verifier or the quality assurance manager.
6. Verifiers sign an annual service-level agreement that was shown to the monitoring team. This document meets the requirements of the *NVQ code of practice* (QCA/06/2888) in providing a code of practice for external verifiers.

7. The recruitment process for examiners was by advertisement in the wider press to attract individuals with the right expertise. They were also shortlisted and interviewed.
8. VTCT currently has two principal examiners, but is seeking to increase this to six to cover all qualification levels and types. There are 20 recently-appointed examiners who are contracted for specific work such as writing, marking and moderating internally assessed units. They are undergoing training and have attended a residential workshop on question writing and familiarisation with VTCT quality assurance procedures.
9. VTCT has invested in developing a new business and information technology system. The new system is more closely aligned with functions and includes a customer relations service, new finance system and a new website. Registration and certification of candidates will be done electronically, with centres better able to track and monitor candidate progress. The new system will also accommodate e-learning through the provision of electronic resources and online assessment. All the different aspects of the system are due to be integrated during autumn 2009.
10. Currently, the IT system can be replicated within four hours should the need arise, but more formal arrangements for setting up an alternative operating location are being considered. VTCT has a business continuity management policy and disaster recovery plan, but both of these documents are in draft.

Accreditation conditions

There are no accreditation conditions for this section.

Observations

There are no observations for this section.

Qualifications development – planning, content and design of qualifications

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 1, 4, 43–44 and 45–55.

Findings

1. Qualifications development is governed by a standardised process for all VTCT qualifications provision, with written procedures for different types of qualifications. This process describes the roles and responsibilities of different staff involved in qualifications development and a flowchart outlining the stages to be followed. A new development procedure was drafted in June 2009 for the Qualifications and Credit Framework (QCF) unit development and developing rules of combination.
2. A qualifications development committee (QDC) made up of internal staff, chaired by a qualifications manager, is responsible for reviewing qualification and unit proposals, monitoring the development of qualifications and reviewing the VTCT qualifications portfolio. This committee meets six times per year.
3. VTCT qualification proposals can come from a variety of internal and external sources. They are usually based on information from employers, centres, external verifiers or relevant industry sector sources. Analysis of sector qualification strategies (SQS) may also inform appropriate qualifications development. Qualification proposals are required to contain evidence to support the need for the qualification in the market place and expected numbers for initial uptake and potential growth. Also included are links to SQS, if appropriate.
4. A standard VTCT qualification proposal submission proforma is completed by a proposer and then forwarded to a qualifications manager who is responsible for convening and chairing the QDC, and making sure the qualifications development processes and procedures are adhered to.
5. The QDC is responsible for reviewing proposals at the planning stage and recommending which qualifications and units should be taken forward and developed. An annual review of existing provision is also undertaken, initiated by the numbers of registrations and certifications generated. A report is actioned for qualifications with less than 100 registrations and certifications, and the QDC reviews the need for the continuation of those qualifications.
6. The director of business development has the responsibility to sign-off the planning stage.

7. Once a qualifications proposal has been approved, a project timeline for development is established and a developer, called a project leader at the time of monitoring, is appointed. An accreditation questionnaire is used to guide the process of development. The developer/project leader completes details of the qualification overview and rationale, and the structure and assessment details.
8. VTCT has built up a register of technical experts who are used either individually or in teams. They have the relevant subject knowledge to develop the content and design of qualifications. They are responsible for writing the learning outcomes and assessment criteria, and providing guidance on the relevant assessment methodology. In line with recent QCF requirements, this has extended to include, where relevant, the credit and levelling of QCF units. For the Diploma principal learning and project developments, new knowledge-based short answer and multiple choice questions have been developed. New stages of paper production procedures have been written to inform how papers are drafted, revised and scrutinised, including the writing of mark schemes.
9. The qualification and assessment material is reviewed by a separate group of technical experts, which is proofread and amended as required. The QDC is required to also review the qualification that has been developed and the product is signed-off by the qualifications manager.
10. The monitoring team was informed that the director of business development also signs-off the qualification, and once the final product has been drafted, the chief executive officer proofreads the product.

Accreditation conditions

There are no accreditation conditions for this section.

Observations

There are no observations for this section.

Quality assurance of the qualifications development process

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

Findings

1. The previous section outlined how VTCT develops qualifications from the planning stage, through content and design to final sign-off of the product.
2. However, the qualifications development strategy document, qualifications development flowchart and the terms of reference of the qualifications development committee are missing key elements in the conduct and governance of VTCT's process for assuring the quality of the qualifications development process.

Accreditation conditions

2. VTCT must amend its qualifications development process to include:
 - the role of the director of business development in the formal sign-off of qualifications and when this is to occur at different stages of the process
 - the role and remit of the chief executive officer in commenting on the final drafted developed product and as the single accountable staff member responsible for final sign-off
 - the rewriting of the terms of reference of the QDC to detail its role and responsibility in qualifications development and sign-off
 - the clarification of the role of the qualifications manager and project leader in project managing the production of qualifications development
 - the rewriting of the strategy and flowchart to fully describe all processes and sign-off points, including locating where the QDC sits in the flowchart.

(The statutory regulation of external qualifications in England, Wales and Northern Ireland (QCA/04/1293), criterion33a.)

Observations

There are no observations for this section.

Quality assurance and control of 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. Previous monitoring has looked in depth at VTCT's delivery of National Vocational Qualifications (NVQs) and vocationally related qualifications (VRQs). The current activity sought an assurance that the systems previously monitored remain the same. Staff confirmed this. For NVQs, staff further confirmed that VTCT systems had been reviewed to take account of the *NVQ code of practice* (QCA/06/2888).
2. More recently accredited qualifications such as those in the QCF and those for the Diploma were not looked at in this monitoring activity, but may be subject to monitoring in the future.
3. The majority of VTCT qualifications are assessed through internal assessment with external moderation. However, the assessment strategies for some qualifications, such as NVQs in hairdressing and beauty therapy, include an element of independent assessment consisting of short answer questions. Some VRQs also include external assessment using multiple choice questions or short answer questions.
4. VTCT is currently updating and formalising all its processes for question paper production. The intention is to utilise the new team of examiners to write all independent/external assessment questions. To date, questions have been written by external verifiers with the relevant technical expertise.
5. For NVQ tests, the pass mark is 100 per cent. Candidates who achieve 70 per cent or more can 'top up' their marks by providing further evidence such as a portfolio or case study. The further evidence is reviewed by external verifiers at visits. Alternatively, candidates can retake the paper.
6. The VRQ question papers are changed every six weeks. The pass mark for the VRQs is 70 per cent. External verifiers sample the completed papers at visits with a further 10 per cent recalled to VTCT annually. These are remarked as an additional check.
7. External assessment tasks are taken on demand. Centres access the tasks by downloading a question paper and mark scheme. Centres administer the tests under controlled conditions.

8. Guidance to centres is available in the centre handbook. This, together with more documents and information, can also be accessed through a secure section of the VTCT website.

Accreditation conditions

There are no accreditation conditions for this section.

Observations

There are no observations for this section.

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Office of Qualifications and Examinations Regulation
Spring Place
Coventry Business Park
Herald Avenue
Coventry CV5 6UB

Telephone 0300 303 3344

Textphone 0300 303 3345

Helpline 0300 303 3346

www.ofqual.gov.uk