Post-Recognition Monitoring Report

National Open College Network

July 2010

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Contents

Introduction

Regulating qualifications

Responsibility for regulating external qualifications lies jointly with three regulators:

- Office of Qualifications and Examinations Regulation (Ofqual), the regulator for qualifications awarded in England and vocational qualifications awarded in Northern Ireland

- Department for Children, Education, Lifelong Learning and Skills (DCELLS), the regulator for Wales

- Council for the Curriculum, Examinations and Assessment (CCEA), the regulator for qualifications (other than vocational qualifications) for Northern Ireland.

The regulators systematically monitor awarding organisations and their regulated qualifications 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 regulated qualifications.

Where an awarding organisation is found not to comply with relevant criteria, the regulators will identify areas of non-compliance that must be rectified within a certain period. 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.

Non-compliances 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 the non-compliances identified through monitoring activity. The regulators will generally 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 about future monitoring and/or the possible imposition of sanctions.

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 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 the outcome of a monitoring activity on the National Open College Network (NOCN) awarding organisation and carried out by Ofqual in June 2010. It draws together the regulators' findings on areas of:

- management and governance

- resources and expertise

- diversity and equality

- development of units and rules of combination for qualifications

- unit/qualification development - design and development of assessment

- delivery of assessment

- centre recognition

- awarding and certification.

This is the first post-recognition monitoring activity on NOCN in respect of the Qualifications and Credit Framework (QCF) since the awarding organisation received supplementary recognition in February 2010.

The monitoring activities included desk research of information already held by the regulators, NOCN's supplementary recognition application and scrutiny of the awarding organisation's website. The regulators' monitoring team visited NOCN's head office to conduct interviews with staff and review documentation.

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

About NOCN

The NOCN provides a range of credit-based units and qualifications. These are for the most part delivered through its Open College Network (OCN) across the UK. For further information about NOCN, visit www.nocn.org.uk.

Management and governance

This is subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (Ofqual/08/3726), paragraphs 2.1–2.3, 5.1 and 5.17.

Findings

1. NOCN is a charitable company limited by guarantee. Its governing body is the Board of Trustees. Delegated authority is given to the chief executive officer to oversee the day-to-day operation of the awarding organisation.

2. The Board of Trustees provides strategic direction for NOCN through its committees. The committees reporting to the Board of Trustees (the Board) include the Regulation and Enhancement Committee, Finance and Audit. A new committee is being set up to deal with information and communication technology (ICT).

3. The Board includes representation from all of the member organisations, the regional OCNs that are licensed by NOCN to deliver and award NOCN units and qualifications. It also includes independent members.

4. NOCN has a senior management team (SMT) made up of its directors and the chief executive officer. There is also a national management team that meets when necessary. The national management team includes NOCN's senior management team and the chief executive officers of the OCNs.

5. Under the terms of the licences, each OCN is required to be a 'fit and proper organisation'. NOCN ensures that quality assurance is maintained through annual licence reviews, which include OCN self-assessments. Continued approval is recommended by the Regulation and Enhancement Committee and approved by the Board if appropriate.

6. NOCN is about to undergo a period of review and change. Both the chief executive officer and the chair of the Board have recently left. A member of the monitoring team spoke to the vice-chair of the Board prior to the monitoring activity. He explained that NOCN would use this opportunity to review itself as an organisation, looking at its direction and structure in order to meet the challenges of the future.

7. The Board intends to appoint a new chair of the Board and an interim chief executive officer very soon after the monitoring activity. Until the latter appointment has been made, the executive director of corporate strategy and development is assuming the role of point of accountability, thus ensuring continuity.

8. Although there is the added complexity of devolved responsibilities to the OCNs, the the monitoring team was satisfied that NOCN has robust and transparent governance arrangements for regulated functions and is taking all reasonable steps to ensure these continue during the period of review and change.

Non-compliances

There are no non-compliances for this section.

Observations

There are no observations for this section.

Resources and expertise

This is subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (Ofqual/08/3726), paragraphs 2.4–2.6, 3.1, 4.1, 5.2, 5.5 and 5.6e.

Findings

1.   NOCN employs about 32 staff at its head office. The majority of these are full-time posts. Prior to recruiting for a vacancy, the post is reviewed by the line manager and a member of the Human Resources Department to ensure it is still required. The executive director of corporate strategy authorises all posts prior to advertising.

2.   Once appointed, new members of staff are subject to a series of performance reviews throughout their probationary period. This becomes an annual process for all established staff. NOCN has recently undergone an organisation-wide training needs analysis. This is good practice and will allow it to identify staff development requirements and allocate appropriate resources.

3.   In reviewing its capability to operate within the requirements of the QCF, NOCN appointed a director of stakeholder engagement. This role was created in order to strengthen links with key stakeholders and to better assess market demand.

4.   The monitoring team noted that several posts on the organisational chart are currently vacant, for example the director of business development and the business development manager. These posts are key to the unit and qualifications development processes submitted by NOCN in its QCF supplementary recognition application.

5.   NOCN staff stated that it is unlikely that these posts would be filled until the organisational review and restructure had taken place. Staff also explained how the work assigned to these posts is being managed. For instance, staff who are working in the Business Development Team currently report to the director of stakeholder engagement.

6.   Each OCN has a structure and a team of staff that mirror that of NOCN as much as possible. For example, there will be a quality function and operations function. These roles are complementary, with OCNs working with centres and NOCN with the OCNs.

7.   As well as its employed staff, NOCN uses quality reviewers to check quality assurance processes in centres and to verify its credit-based units and qualifications. A generic role and responsibilities document is available and is used by NOCN and the OCNs. NOCN contracts with quality reviewers for the range of qualifications that it delivers, in the areas of security and religious

education. An NOCN contract of work for quality reviewers is issued annually, but only after performance is reviewed.

8. The OCNs are responsible for the appointment of quality reviewers for the qualifications they deliver. NOCN staff stated that the OCNs have moved to employing their quality reviewers rather than contract with them.

9. Each qualification area delivered by NOCN has a lead officer. The lead officers are responsible for training their quality reviewers and hold quarterly meetings. More specific training is provided when required. For instance, quality reviewers for the security qualifications attended a training course on physical intervention, which is a new feature in these qualifications. Further training for quality reviewers is through national standardisation events that are run for each of the qualification areas.

10. NOCN is currently embedding its new unit and qualifications development processes. For each qualification under development, there is a project team that is managed by a lead developer. NOCN intends to provide training for lead developers twice a year. The first of these will take place early in July 2010.

11. NOCN's procedures ensure that its experts and staff provide NOCN with access to expertise in subject/sector areas, as well as the design and development of units and rues of combination. As an existing awarding organisation, NOCN has proven experience in assessment and awarding.

12. NOCN and its OCNs share an IT system. This ensures that NOCN has immediate access to and control of information, such as candidate entries and centre details. A draft IT security policy and procedures documents has recently been developed. The policy includes data security for NOCN and OCNs and security relating to data transfer. The policy will be issued to all OCNs during summer 2010.

13. NOCN has an offsite data centre. A second data centre is planned in a separate location that will mirror the first. This will provide an additional level of security and a faster data recovery service.

14. The monitoring team asked about formal business continuity strategy and disaster recovery plans. These are in development and will be a priority for the new chief executive officer, once appointed. Staff stated that systems could be accessed by staff who work from home and they may also be able to use local OCN facilities. The monitoring team was satisfied with the evidence of work in progress that this task is being actively pursued.

Non-compliances

There are no non-compliances for this section.

Observations

There are no observations for this section.

Diversity and equality

This is subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (Ofqual/08/3726), paragraphs 2.11–2.14.

Findings

1. In reviewing its systems and procedures for the QCF supplementary application, NOCN took the opportunity to revise its equality and diversity policy and ensure the ethos is embedded into the systems for all of its regulated functions, including unit and qualification development processes. For example, representatives of learners are involved in unit/qualification development to mitigate potential barriers to access. Another example is that NOCN will use the diversity and equality data it collects to inform its unit/qualification review processes.

2. NOCN has also embedded equality and diversity issues into its training for assessors and internal verifiers, and ensures that its quality reviewers understand and act appropriately on these issues.

3. Centres are required to have a range of policies and procedures in order to be recognised. These include an equal opportunities and diversity policy, a disability discrimination policy, and a fair access policy. Quality reviewers check for equality of opportunity in the application of assessment at centres.

4. Reasonable adjustment procedures ensure that qualifications can be accessed by individuals with specific and additional learning needs when required. However, NOCN staff stated that reasonable adjustments were seldom used, as the flexibility of its internal assessment methodology is responsive to the needs of individual learners.

Non-compliances

There are no non-compliances for this section.

Observations

There are no observations for this section.

Development of units and RoC for qualifications

This is subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (Ofqual/08/3726), paragraphs 3.2, 4.2, 4.3 a–f and 6.2a.

Findings

1. Proposals for new units/rules of combination for qualifications are considered following the completion of a Qualification Initial Proposal (QUIP) form. The idea for a qualification can come from a variety of sources, such as the Sector Skills Council (SSC), a training provider or more usually from an OCN.

2. The QUIP form requires the proposer to provide information, including the rationale for the unit/qualification, the potential market, its purpose, estimated credit value and an indicative rule of combination. The proposer has to identify existing units from the unit databank and where there is a need for new ones.

3. The QUIP form also requires the proposer to identify the members of staff who could form the Project Development Group and to indicate their experience of developing units/qualifications. Evidence of this experience, for example CVs, is required to be submitted at the qualification proposal stage.

4. The initial process is flexible as it also includes a rapid response process that allows decisions to be made quickly where required, but ensuring due process is maintained throughout. The monitoring team is satisfied that this is a thorough and transparent process that meets the QCF arrangement requirements.

5. The QUIP form is considered by the Qualification Development Assessment Group (QDAG). The members of this Group are the director of quality, director of stakeholder engagement, director of business development and a chief executive officer from an OCN. The business development coordinator acts as the panel secretary. The QDAG members use set criteria to decide if the proposal can go forward for development or whether it is deferred or rejected.

6. The monitoring team were provided with evidence of the QDAG decision log, which demonstrates that ideas for potential units/qualifications are carefully considered prior to further development.

7. Once the initial proposal is agreed, the Project Group is set up and the development process begins. This includes the completion of a qualification proposal form. This form provides a significant amount of information and supporting evidence about the qualification. It includes evidence of consideration of market and sector priorities, dialogue with SSCs and employers, a full business case with expected take up and a timetable for development.

8. The completed qualification proposal is considered by the Qualification Stakeholder Panel (QSP). Members of this panel include the NOCN chief executive officer, QDAG members plus external stakeholders, including employer, provider and learner representatives.

9. The QSP is a new panel that was introduced to meet the requirements of the QCF. It had its first formal meeting on 7th July 2010 and will meet twice a year. NOCN intends that the panel will move towards a strategic planning approach to deciding on qualifications that NOCN will offer. Key decisions will be recorded and reported to the Regulation and Enhancement Committee. As this is at an early stage, the effectiveness of the QSP cannot be tested.

10. However, NOCN provided evidence of clear terms of reference for both the QDAG and QSP panels that show remit, authority and decision making, which ensure that a transparent process is in place.

11. The qualification development process continues with the identified lead developer working with the Project Group to develop the units and rules of combination for the qualification. NOCN has a process in place to ensure that members of the Project Group have expertise in developing units and qualifications, as well as subject and assessment expertise relevant to the qualification being developed.

12. NOCN staff described how units and rules of combination are produced by the Project Group, using a combination of the QCDA guidance and professional judgement. The unit template records learning outcomes and assessment criteria. Credit and level is determined through discussion based on the experience and different views of the Development Group to achieve a consensus. Learners' representatives are involved in the process. NOCN produced examples of units that have been through the two-stage quality assurance process with two readers reviewing each unit. These examples provided evidence that the readers identify where units do not meet the QCF requirements and are returned for amendment.

13. NOCN assigns a member of the business development team to each Project Development Group to ensure that the qualification, units and rules of combination are fit for purpose and that key decisions during the development process are recorded. All qualification proposals are monitored for completion by the business development coordinator.

14. The monitoring team were provided with details of the *Electronic Submission/Units and Rules of Combination Folder*. This is used by the Project Development Group to store all documents relating to the development of units and rules of combination, including meeting notes and emails, and provides a full audit trail of development.

15. NOCN procedures state that a senior member of the business development team reviews the quality and signs-off the qualification prior to submission to the regulators. Currently this 'sign off' is being carried out by the business development coordinator.

16. NOCN has a comprehensive unit and qualification review process. It has two processes that run concurrently. The three-year review looks at evaluating qualifications that are due to expire. Decisions will be made on whether to allow the qualification to expire, extend, amend or withdraw it. The annual review is a quality and standards review, sampling evidence collected through events such as national standardisation activities and data on equality and diversity. The director of quality reviews the evidence to ascertain any potential risk to the standards. Outcomes are either fed into the three-year review cycle or into the qualifications development process if amendment is required.

17. Information from reviews is taken to the Qualification Review Assessment Group (QRAG), which makes recommendations to the QDAG if appropriate.

18. Although NOCN's review procedures are in place, it is too early for them to have been used to review the new QCF units/qualifications, so they could not be fully tested.

Non-compliances

There are no non-compliances for this section.

Observations

There are no observations for this section.

Design and development of assessment

This is subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (Ofqual/08/3726), paragraphs 5.3 a–g, 5.4 and 5.16a.

Findings

1. The design and development of assessment for qualifications is either undertaken by NOCN or by OCN centres. NOCN designs and develops assessment for three main sectors: the security industry, functional skills, and skills for life. However, the majority of NOCN certificates are issued by the OCNs and have assessments designed by OCN centres.

2. The suite of security qualifications uses a different method of assessment than is traditional for NOCN. These qualifications were jointly developed by the industry regulator, the sector skills body and a group of five awarding organisations. The Security Industry Authority (the industry regulator) decided that multiple-choice examinations would be the most effective for the industry and for dealing with the large volume of candidates.

3. Skills for Security's (the sector skills council) commercial arm carries out the examination processes, including marking completed examination papers on behalf of NOCN. A joint Examinations Group chaired by NOCN reviews the questions and write new ones.

4. The most common method of assessment for NOCN qualifications is based on internal assessment. NOCN produces a suite of documents to assist assessment designers. These include a qualification guide for each qualification and a *Qualification Development Template v5 February 2010* that includes guidance on appropriate assessment arrangements for qualifications. Other documents are the *NOCN Unit Plus* template that allows them to choose from 14 potential assessment methods and the *Assessment Definitions* document, which describes the different assessment methods.

5. Tutors in centres design an assessment strategy and assessment tasks for the courses they deliver. Practitioners from centres are also involved in the design process, which demonstrates how the assessment needs of candidates are taken into account, alleviating potential barriers to access.

6. The centre's internal verifiers will check the strategy and assessment tasks before they are used, and these are also monitored by quality reviewers. This enables NOCN to quality assure the design and development of assessment.

Non-compliances

There are no non-compliances for this section.

Observations

There are no observations for this section.

Delivery of assessment

This is subject to the *Regulatory arrangements for the Qualifications and Credit Framework* (Ofqual/08/3726), paragraphs 5.5, 5.6, 5.9, 5.10, 5.16b and 5.20–23.

Findings

1. NOCN provided the monitoring team with its procedures for the delivery of assessment. The majority of NOCN assessments are set, marked and verified by centres. Assessors and internal verifiers have available national NOCN training and approval processes, but may also attend training events at regional OCNs. Internal verifiers are responsible for ensuring the quality of assessment at centres, including training, sampling assessment decisions and for standardising assessors.

2. This assessment process is highly dependent on a rigorous centre recognition process and the quality reviewers carrying out the quality assurance checks. Quality reviewers monitor delivery of assessment by visiting centres and reviewing assessment strategies/tasks.

3. Assessment decisions are confirmed either by an NOCN approved internal verifier in the centre or by the quality reviewer. Quality reviewers also monitor the work of the approved internal verifiers.

4. Quality reviewers are usually allocated to a number of centres and have detailed knowledge of the centre staff, and the assessment and internal verification procedures. Post-centre recognition monitoring enables the quality reviewers to ensure that there is consistency in assessment across centres.

5. There is a two to three-year programme of national standardisation events working to a set agenda. These are based on sectors and/or qualifications. Quality reviewers collect samples of assessment evidence for units from their centres and submit them to NOCN. NOCN members of staff select the samples to be used to inform the discussions at standardisation events. Quality reviewers work in groups to consider the samples and agree standards.

6. A report of the standardisation is published on the NOCN website. Other outcomes include exemplar assessment tasks and standards statements that are fed back to assessment staff in centres.

7. The work of the quality reviewers is monitored informally by the NOCN lead officers or quality teams in OCNs. They use the visit report, accompanied visit reports and performance at national standardisation events as evidence. However, NOCN must ensure that this process is formalised, so that there is a performance management system in place for all individuals involved in assessment.

8. A member of the regulatory monitoring team attended a national standardisation event that took place during the monitoring period. This confirmed that the process was followed and was robust.

9. As well as the national standardisation events, OCNs hold their own regional standardisation meetings that look at a smaller selection of the samples of work originally collected by the quality reviewers.

10. Learners' assessed work is authenticated through the signing and dating of work, and checking by quality reviewers. For the security of qualifications, photographic evidence is a requirement of the industry regulator.

11. NOCN is able to offer assessment in Welsh with translation services available from a collaborative partner operating in Wales if required.

12. NOCN has a process in place to review the procedures for the delivery of assessment, but it is too early for this to be tested for QCF qualifications.

Non-compliances

1. NOCN must have in place a performance management system to monitor and evaluate the effectiveness of people involved in assessment (*Regulatory Arrangements for the Qualifications and Credit Framework* (Ofqual/08/3726), paragraph 5.6f).

Observations

There are no observations for this section.

Centre recognition

This is subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (Ofqual/08/3726), paragraphs 5.11, 5.16b and 5.18.

Findings

1. NOCN has a set of documents for centre recognition. These include the *Centre Recognition Process*, *Quality Assurance, Risk Assessment* (of centres), and the *Curriculum Plan*. Together they form a consistent model for centre recognition and monitoring.

2. NOCN staff described to the monitoring team its process for recognising centr*es.* Prospective centres complete a *New Business Enquiry* form and send it to the relevant OCN. The business development teams work with centres to ensure that they have sufficient resources to support and deliver the qualifications.

3. The prospective centre completes the centre recognition application form and curriculum plan, which outlines what the centre is intending to deliver, staffing and other resources.

4. The centre must identify a single point of accountability and demonstrate a robust internal approval system for NOCN courses.

5. The centre's capacity to obtain unique learner numbers (ULNs), carry out checks with the learner, get permission from the learner for their achievement data to be uploaded to the Personalised Learner Record (PLR), track the progress of learners and record recognition of prior learning, is checked at centre recognition.

6. Completed applications are subject to a risk assessment by the quality and business development teams. The assigned quality reviewer will also make an assessment of the application against the recognition criteria. The centre is finally formally recognised by the Quality Committee in some OCNs.

7. Following recognition, centres are visited by quality reviewers at least once a year to ensure ongoing compliance against the recognition criteria. The actual number of visits is dependent on the centre's risk assessment. The outcome of these visits, which also include quality assurance checks against assessment tasks, is the production of a quality improvement plan for the centre.

Non-compliances

There are no non-compliances for this section.

Observations

There are no observations for this section.

Awarding and certification

This is subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (Ofqual/08/3726), paragraphs 5.12–5.15, 5.16 c–d and 5.19.

Findings

1. Once the learner has achieved the required assessment tasks for the unit, the assessor completes a *Recommendation for the Award of Credit* form.

2. The *Recommendation for the Award of Credit* form is 'signed off' by the approved internal verifier or the quality reviewer.

3. The signed documentation is sent by recorded delivery to the OCN or NOCN where applicable. Registration and award staff input the data and issue course certificates. The Qualification Checker will identify where all the units in the rule of combination have been achieved for a qualification and certificates for these can then be generated.

4. NOCN has a national standard of 35 days for the issue of certificates, but staff who were interviewed stated that they were usually issued within 10 days of receipt of the claim.

5. The monitoring team was shown the NOCN IT system, looking at the in-built checks and balances to safeguard against any mistaken claims for certification. These include blocking any claims where a centre or internal verifier was not approved for the qualification, or had not been 'signed off' by an appropriate person.

6. In readiness for the QCF, NOCN reviewed its awarding and certification procedures in consultation with the OCNs. Exemptions and equivalencies are new for the QCF and NOCN recognises that this is an area that requires further work with other awarding organisations on how this information is shared.

Non-compliances

There are no non-compliances for this section.

Observation

1. NOCN needs to consider how it will ensure that standards are comparable year on year across centres, units and qualifications at the same level with the same title, and where identical units are assessed, using different assessment methods (QCF, paragraph 5.16d). It is recognised that this monitoring visit is early in the implementation of the QCF for NOCN and that it will take some time for NOCN to be able to provide evidence of this. Consideration needs to be given to how standards will be compared.

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