





Post-Recognition Monitoring Report

Oxford Cambridge and RSA Examinations

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Introduction

Regulating qualifications

Responsibility for regulating qualifications lies jointly with three regulators respectively:

- 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 responsible 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 as to 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 Oxford Cambridge and RSA Examinations (OCR) awarding organisation and carried out by Ofqual in May 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
- design and development of assessment
- delivery of assessment
- centre recognition
- awarding and certification.

This is the first post-recognition monitoring activity on OCR in respect of the Qualifications and Credit Framework (QCF) since the awarding organisation received supplementary recognition in November 2009.

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

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

About OCR

OCR was formed in 1998 by the merger of the University of Oxford Delegacy for Local Examinations, the Oxford and Cambridge Schools Examination Board and the Royal Society of Arts. It forms part of the University of Cambridge.

For more information about OCR and the qualifications it offers, visit its website at www.ocr.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.

- OCR is a large awarding organisation, offering a wide range of general and vocational qualifications. It was last monitored by the regulators in July 2006 on its arrangements for developing and delivering accredited vocational qualifications. It was recognised to operate as an awarding organisation within the QCF in November 2009.
- 2. Since 2006, there have been no significant changes to OCR's company limited by guarantee and charitable status. It remains part of Cambridge Assessment, the brand name of the University of Cambridge Local Examinations Syndicate (UCLES). OCR continues to have a chief executive and board, and is a selfcontained business stream within Cambridge Assessment.
- 3. There have been changes to OCR's organisational structure since 2006 and there are now six divisions instead of seven. The significant differences are that a new Qualifications Division was been formed in October 2006 from the previous vocational assessment and general assessment divisions. This Division is responsible for development of all OCR qualifications and the management of the assessment and awarding processes of these.
- 4. A new Standards Division was formed in October 2009 and was previously the Quality and Standards Division. The quality team transferred to the Operations Division, taking with it its remit for the operation of its quality management system, which complies with the defined scope requirements of ISO 9001:2008. A Quality Management Review Group made up of senior staff meets once every two months to review compliance with OCR's business planning processes, including its risk register, action plans from these and customer satisfaction performance.
- 5. The Standards Division is responsible for the standards of all OCR qualifications and for the maintenance of qualifications regulation compliance. The director of the Standards Division is the single named point of accountability for maintaining the quality and standards of all statutory regulated qualifications, and for maintaining the quality of QCF regulated functions of developing and submitting units, developing rules of combination and operating as an awarding organisation.
- 6. A new qualifications board has been set up to oversee and strategically steer the development of a portfolio of qualifications, including QCF qualifications, in line with OCR's business planning priorities. The board is made up of the chief

executive and divisional and senior managers. It meets six times per year. The terms of reference citing purpose, roles and membership were provided. A key role is to approve qualifications development.

- 7. Also new are four development groups to oversee and operationally steer qualifications developments in specific qualification areas, one of which is the QCF Development Group. This Group is responsible for the monitoring of the implementation of the strategy for the QCF and ensuring that the QCF regulatory arrangements are met. It meets 12 times per year.
- 8. For some of the QCF qualifications that OCR offers, it has contributed to the development of units for these with other organisations, particularly with sector skills councils (SSCs) as the lead organisation and other awarding organisations, normally via awarding organisation forums. These meetings are minuted and describe the work undertaken by the participants. The monitoring team considered this against the QCF regulatory arrangement outlined in paragraph 2.3 which requires that if an organisation contributes to a regulated function, the cooperating organisations must identify the lead organisation responsible for quality assurance and hold written statements of the responsibilities of each organisation. The monitoring team felt that the practice of recording should be strengthened to identify the lead organisation and produce written statements of the responsibilities.

Non-compliances

There are no conditions for this section.

Observation

1. When engaged in contributing to a regulated function, OCR should ensure that, in partnership with the other cooperating organisations, a written statement of the responsibilities of each organisation is produced, which also identifies that the lead organisation is a recognised organisation and is responsible for quality assurance.

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.

- OCR has not increased its workforce as a result of taking on the QCF regulated functions of developing and submitting units, developing rules of combination and the requirements for awarding organisations from the last monitoring activity. The overall number of permanent members of staff has remained at approximately 650.
- 2. A five-year business planning process, owned by the chief executive, is operated by OCR. This includes the organisation's financial strategy and allocates specific budgets to each division. Business planning review takes place on a quarterly basis. Divisional plans and budgets are produced on a yearly basis. The senior management team is responsible for financially reviewing budgets on a monthly basis.
- 3. When the need to commit resources is required, as operating in the QCF, a business case model is used and presented to the senior management team for endorsement and approval. A programme office has operational responsibility for managing any changes required to meet business strategy requirements. The work of this office is to ensure all projects, as with the QCF, are business relevant, and provide the financial governance and controls for these.
- 4. OCR's human resource strategy has not changed since the last monitoring activity, with the process for recruitment, selection, induction and ongoing training of staff remaining the same. A formal performance management system is in place with the annual performance of each employee being measured through set objectives that are linked to team and divisional objectives. Each employee also has development objectives set that are provided for through an annual programme of generic events and specific events where required, for example writing units for the QCF.
- 5. OCR did not recruit new staff to resource its QCF services. Instead, it relied on existing staff and trained these staff to meet the demands of the QCF regulated functions, particularly in developing units and rules of combination. OCR has been involved in the QCF since the test and trials began, and its staff have attended the briefing and training events on the QCF in the national workshops that were provided by the Qualifications and Curriculum Authority (QCA). It adopted a policy of then cascading this throughout the organisation as individuals built up their knowledge and expertise in the QCF. This has included training staff in the areas of the determination of levels and credit values. As

- part of the divisional changes since 2006, there has been a restructuring of teams and responsibilities to prepare and operate its QCF services.
- 6. There has been the need to introduce system technical changes to meet the demands of the QCF. The resourcing of this went through the normal channels and the business case was approved by senior management and monitored by the programme office. An OCR risk management policy is one part of a quality management system (QMS) and forms an operational component of an overall business continuity and disaster recovery plan owned by Cambridge Assessment for the group. The monitoring team was informed that work is currently ongoing to align these two systems.
- 7. OCR has clear policies and procedures in place to ensure it has access to individuals who have expertise in the relevant subject or sector for both unit and rules of combination development, and assessment and awarding. These include clear expectations in the form of person specifications and key accountabilities. Members of staff have access to ongoing training and guidance to support them in these functions.
- 8. The access OCR has to expertise for the design and development of units and rules of combination in particular, and the expertise required to determine the level and credit of units were considered. This expertise has been developed from OCR's long-standing participation in the QCF test and trials. It has been predominately in-house and on the job, supported by ongoing training and guidance. The monitoring team felt that OCR's expectations as to what it currently requires for this expertise needs to be made explicit and listed in the role specifications of key staff, including unit writers for determining the level and credit of units.

Non-compliances

 OCR must detail the additional expertise requirements for staff responsible for the design and development of units about determining the level and credit of units (*Regulatory Arrangements for the Qualifications and Credit Framework* (Ofqual/08/3726), paragraph 3.1a).

Observation

1. OCR should notify the regulators when the new business continuity and disaster recovery plan is in operation, and provide a copy for banking purposes.

Diversity and equality

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

- OCR ensures its legislative compliance through dialogue with the organisation's legal team. OCR is a member of the Ofqual Access Arrangements Group and uses this forum to assist its development of access policies and procedures. An example of this is where, following discussion at the forum, awarding organisations decided to collaborate in the development and use of an *Inclusion* tick sheet as a common and consistent approach in communications with centres. The *Inclusion* tick sheet helps centres to identify the different barriers and arrangements available for them. The regulators considered this to be an example of good practice.
- 2. OCR is an active member of the JCQ Awarding Bodies Group and the Federation of Awarding Bodies (FAB), and has agreed definitions in relation to access arrangements, reasonable adjustments and special consideration that are well documented on the OCR website.
- 3. OCR stated that it relies heavily on the Qualifications and Curriculum Development Agency (QCDA) access arrangements online for the vast majority of its reasonable adjustments approvals. This online system however focuses on general qualifications such as GCE A levels and GCSE and does not include vocational qualifications. It is therefore uncertain whether or not OCR has adequate procedures in place to collect sufficient data to allow it to effectively monitor and evaluate its compliance with the QCF regulatory arrangements outlined in paragraphs 2.11–to 2.13.
- 4. OCR reviews changes in legislation, and where necessary, makes modifications to qualifications. As a result of the Disability Discrimination Act (DDA), OCR reviewed its access arrangements. An example of this is with regard to the accessibility in the QCF Text Processing (Business Professional) suite of qualifications. Four new text production units were developed with the Royal National Institute of Blind People (RNIB) to ensure that qualifications can be accessed by individuals with specific and additional learning needs. To meet both the requirements of accessibility and competence standards, the units were developed specifically for use with dictated text and screen reader software. These new units were not 'disability units', but were made available to everyone. The regulators considered this good practice.
- 5. OCR makes appropriate reasonable adjustments to standard assessment arrangements, wherever this is required to enable access. Centres are

- encouraged to apply within set calendar parameters, although applications will be facilitated until the very last possible moment.
- 6. OCR provides equality and diversity training for all internal team members as part of its organisational induction programme. All staff interviewed by the regulators had received qualification-specific training relating to this area. Regulators found no evidence however that OCR associates, such as external verifiers, receive or have access to any formal training in equality and diversity.
- 7. Consideration of diversity and equality is embedded into all aspects of OCR's work. In some instances, this consideration is implicit rather than explicit. For example, while discussion with qualifications development staff gave the regulators confidence that consideration was given to diversity and equality in their regulated functions, there were no explicit procedures to ensure that this happened consistently. OCR has recently developed a DDA Issues Checklist as part of the unit/qualifications development process. This is positive progress, but could be expanded further to ensure that no other barriers to learning are present, such as ethnicity and gender.
- 8. When developing OCR units and qualifications, the assessment support manager is available to the qualifications development team to guide them in matters relating to equality of opportunity. This support however is not always utilised.

Non-compliances

There are no non-compliances for this section.

Observations

- 1. OCR should distinguish who has overall responsibility for ensuring OCR compliance with QCF requirements in relation to diversity and equality in the sign-off of units and rules of combination.
- 2. Sufficient data relating to barriers to learning must be collected to allow effective monitoring and evaluation of compliance with QCF requirements. OCR should review its data collection in order to ensure that this is attainable.
- 3. OCR should ensure that associates, such as external verifiers, receive or have access to appropriate training in equality and diversity as part of the assessment process.
- OCR should consider developing further its procedures to ensure formal recording of any developmental discussions or considerations that take place in relation to barriers to learning.

Development of units and rules of combination for qualifications

This is subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (Ofqual/08/3726), paragraphs 3.2, 3.3, 4.2, 4.3 a–f, 4.4 and 6.2a.

- The regulators were provided with a copy of the *Development Process* Workflow, which is a detailed flowchart for the development of units, rules of
 combination and qualifications. It is supported by a series of working
 instructions, guidance papers on developing QCF units, and rules of
 combination development and templates.
- 2. Strategic direction for the development of units and qualifications is provided by the qualifications board.
- 3. The decision on qualification development is informed by a process for interaction with stakeholders, including employers, providers and SSCs, to ensure demand for the qualification and inform ongoing development. Through this, good use is made of a range of provision planning tools.
- 4. Qualifications for development are allocated to a Qualifications Development Group to take forward. They will allocate a qualifications manager, agree a schedule for the development and will also approve rules of combination, informed by provision planning tools.
- 5. Once responsibility for development is allocated to a qualifications manager, it is undertaken on a project basis with a schedule that lists tasks and milestones while tracking the progress through indication of 'percentage complete' against each task. This document on its own lacks detail to evidence that the regulatory requirements for unit and rules of combination design and development are followed systemically, although the regulators were able to confirm verbally with members of staff at OCR that this was the case.
- 6. It is unclear from either the *Development Process Workflow* or the development schedule where interrogation of the unit databank takes place, although verbal confirmation was provided by OCR that this is undertaken before the development of units/rules of combination is undertaken.
- Guidance is provided on calculating credit value, the process and outcome is recorded separately and subject to expert review. Similarly, the process for determining unit level is recorded, with guidance being referenced to the QCDA Guidelines for Writing Credit-Based Units of Assessment for the QCF (QCA/08/3873).

- 8. For both credit and level, no formal documentation was shown to the regulators to confirm that they have been determined in an accurate and consistent way, although the regulators noted that a new draft working document, *QCF Unit Sign Off*, will remedy this. Verbal detail obtained at the visit confirmed that regulatory requirements in these areas were being met.
- 9. Outside of the qualifications manager, there is no documented review of the development other than line management review of the individual qualifications manager's performance, which implies some overview at least should be taking place. The qualifications board is not involved in the formal process of sign off, monitoring development by exception only.
- 10. Procedures for ongoing review are stated in the process documents for qualifications development and also the working instruction for Qualifications performance review. While these, together with verbal confirmation at the visit, imply that review is carried out in line with the regulatory arrangements, no auditable documentation is currently used.
- 11. Overall, the processes employed by OCR in unit and rules of combination development and review appear to meet the regulatory requirements and design specifications, although they would benefit from a more clearly defined audit trail.

Non-compliances

There are no non-compliances for this section.

Observation

1. The processes employed in unit and rules of combination development and review would benefit from a more clearly defined audit trail that details the processes undertaken and the associated accountabilities, leading to review and submission to the framework. The regulators were informed that further documentation to address this is being developed.

Design and development of assessment

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

Findings

- The regulators were provided with a copy of *Development Process Workflow*,
 which is a detailed flowchart for the development of units, rules of combination
 and qualifications. It is supported by a series of working instructions, guidance
 papers on developing QCF units and rules of combination development and
 templates.
- 2. Assessment development forms part of this flowchart and also of the schedule that is approved by the Qualifications Development Group and managed by the allocated qualifications manager. The process document *Preparing the Assessment Infrastructure* sets out the high-level requirements for assessment development, which are further amplified in the working instruction *Producing and Quality Assuring Vocational Qualification Specifications*.
- 3. No further live documentation was presented to evidence an audit trail of the work undertaken and accountabilities, although the monitoring team understands that additional documentation is being developed.
- 4. On grading, the regulators were provided with a verbal assurance that 'pass' was used as the benchmark and reflected all learning outcomes for a unit being achieved and that any further grades were built on this.
- 5. Overall, the processes employed by OCR in assessment development and review appear to meet the regulatory requirements and design specifications, although they would benefit from a more clearly defined audit trail.

Non-compliances

There are no non-compliances for this section.

Observation

1. The processes employed in assessment development and review would benefit from a more clearly defined audit trail that identifies the processes undertaken and the associated accountabilities, leading to review and submission to the framework. The monitoring team was informed that further documentation to address this is being developed.

Delivery of assessment

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

- The regulators were provided with several documents, including a qualification pack for the OCR Level 3 Diploma in Policing (QCF). These documents identify administration, tutor guidance and assessment opportunities for this qualification. OCR produces other guidance documents that are available through its customer forum events and on its website, which can be downloaded by centres.
- 2. OCR's communication with its centres is good. Centres are kept abreast of developments and guidance through the organisation's website, published documents, external verifier communications and QCF updates, such as the OCR Guide to Qualification Migration on the QCF. Information given to centres, for example Admin Guide to Vocational Qualifications and the Centre Handbooks (qualification specific), clearly describe the expectations on centre staff involved in internal assessment. Centres are also given clear guidance regarding recording decisions, retaining evidence and declaring authenticity of evidence, and adherence with these requirements is checked by external verifiers.
- 3. Regulators were shown evidence of verification standardisation meetings for both the *OCR Level 3 Diploma in Policing (QCF)* and the *OCR Text Processing (Business Professional)* suite of QCF qualifications. Agendas and presentations for training events were seen, showing that a range of issues both at system and qualification levels are covered. Attendance at training events is a contractual obligation for all OCR external assessment associates, known as assessors, external verifiers/moderators and examiners within OCR.
- 4. Procedures are in place to monitor the work of all external assessment associates. All associate reports are evaluated with full feedback, and 'grading' given. Where the performance levels of external assessment associates indicate that an acceptable level has not been achieved, issues are clearly identified and dealt with through retraining and mentoring. Where assessment, administration or conduct has put the integrity of the assessment at risk, OCR confirmed that the contract of associates has been terminated. Systems are in place to ensure that there is no conflict of interest for those involved in the assessment process.
- 5. OCR has in the past, offered selected qualifications (NQF qualifications) through the medium of Welsh and will continue to do so in the QCF. OCR has

systems in place to ensure that qualifications meet the required standards and are consistent with qualifications offered in English. Comparability of assessment is ensured through a robust process of translation, contextualisation and review. Welsh medium examiners are given both English and Welsh assessments to mark to ensure comparability.

- 6. OCR uses a variety of internal and external assessment methodologies within its QCF provision. Internal assessment gives centres the opportunity to assess qualifications on both an individual basis and holistically over a number of units. This is available for a number of its qualifications, such as the OCR Level 2 Certificate in Administration (Business Professional).
- 7. In instances of shared qualifications, specific assessment methodologies may be identified, such as the OCR Level 3 Diploma in Policing (QCF). This qualification was developed in partnership with the Skills for Justice SSC, and the documentation provided to centres is clear and unambiguous.
- 8. Frequent standardisation activities are built into processes for external assessment, with clear guidance given in relation to sampling, records and outcomes needed. Reports produced by chief moderators and chief examiners demonstrate that accuracy and consistency of standards of units, across units and over time is considered to ensure that the regulatory arrangements are met.
- 9. The regulators could find no evidence of guidance provided to centres that relates to recognition of prior learning (RPL) for the qualifications examined. There were examples of such guidance being provided for other qualifications. Regulators were told that external verifiers are required to check that instances of RPL are logged, but the appropriateness of RPL is not checked by OCR. Regulators could not find evidence or reference to an RPL log in either the *External Verifier Manual (2009–2010)* or the external verifier visit documentation supplied to regulators.

Non-compliances

 OCR must have procedures or systems in place to recognise, monitor and support centres with regards to RPL. Centres are required to have the staff, resources and systems necessary to support the assessment of units and the award, accumulation and transfer of credit (*Regulatory Arrangements for the Qualifications and Credit Framework* (Ofqual/08/3726), paragraph 5.11 c and g)-

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

- OCR has well-established processes and procedures to recognise centres to offer their qualifications, and these have been updated to reflect specific requirements for the QCF.
- 2. There is a written policy in place for centre approval, supported by application forms for approval, reports on approval visits and process diagrams for recognition and ongoing monitoring. Together, these address the regulatory requirements as detailed above.

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. As part of the introduction of system technical changes to meet the demands of the QCF, overseen by the programme office, OCR was required to convert and redesign its IT systems to cater for the processing and award of credit. This allows for the award of credit at different times and is separate from the award of a qualification.
- 2. Each qualification is supported by a scheme information sheet. This document is the record of the units it contains, the rules of combination available, including credits from equivalent units and exemptions where appropriate. There is a three-stage developmental process in place to generate and sign-off scheme information sheets. This is also user tested at the developmental stage to ensure that the information contained in the sheets are accurate and can generate the correct results. If decisions are reviewed and results adjusted in cases where errors are identified, these are amended on scheme information sheets and relate explicitly to the award of credit.
- As part of the system technical changes, OCR has systems in place for the awarding and certification of credits and qualifications based on credits. The use of scheme information sheets enables the IT system to identify the point at which a learner has completed a qualification based on the credits it has awarded.
- 4. A new credit certificate was produced that was different from the one that was presented as part of OCR's application for QCF recognition (supplementary). This meets the design requirements for QCF credit certificates.
- OCR has a qualifications performance review (QPR) in place to assess and review the performance of qualifications at designated points in their lifecycle. The regulators were informed that this is used for the review of QCF qualifications. However, this review does not explicitly reference how this process reviews its procedures for awarding credit to ensure consistency with the QCF regulatory arrangements for awarding and certification.

Non-compliances

There are no conditions for this section.

Observation

1. OCR should consider making explicit in the QPR how the procedure for awarding credits is reviewed.

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