

**Ofqual**  
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# **Post-Recognition Monitoring Report**

## **Signature**

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April 2011

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## Contents

Introduction.....	3
Regulating qualifications .....	3
Banked documents.....	3
About this report .....	4
About Signature.....	4
Management and governance .....	6
Findings.....	6
Non-compliance .....	7
Observations .....	7
Resources and expertise .....	8
Findings.....	8
Non-compliance .....	9
Observations .....	9
Diversity and equality .....	10
Findings.....	10
Non-compliance .....	11
Observations .....	11
Development of units and rules of combination for qualifications .....	12
Findings.....	12
Non-compliance .....	12
Observations .....	13
Design and development of assessment.....	14
Findings.....	14
Non-compliance .....	14
Observations .....	14

*Post-Recognition Monitoring Report: Signature Awarding Organisation*

Delivery of assessment .....	15
Findings.....	15
Non-compliance .....	16
Observations .....	16
Centre recognition .....	17
Findings.....	17
Non-compliance .....	18
Observations .....	18
Awarding and certification .....	19
Findings.....	19
Non-compliance .....	20
Observations .....	20

## **Introduction**

### **Regulating qualifications**

The responsibility for regulating 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 responsible for qualifications (other than vocational qualifications) awarded in Northern Ireland.

We 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 provide observations on ways in which the awarding organisation could change its systems and procedures to improve clarity or reduce bureaucracy.

Instances of non-compliance 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 any non-compliance issues identified. We will generally agree the action plan and monitor its implementation.

We will use the outcomes of monitoring and any subsequent action taken by awarding organisations to inform decisions on future monitoring and/or the possible imposition of sanctions.

### **Banked documents**

As part of their awarding organisation recognition process, the regulators require awarding organisations to submit certain documents to Ofqual, to be held centrally. Information from these 'banked' documents is used to inform monitoring activities and may also affect an awarding organisation's risk rating.

A suite of documents has been identified as suitable for banking, consisting of those items 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 Signature Awarding Organisation that was carried out by Ofqual staff between February 2011 and April 2011. 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 (RoC) for qualifications
- design and development of assessment
- delivery of assessment
- centre recognition
- awarding and certification.

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

The monitoring activities included desk research of information already held by us, examination of Signature's recognition application and scrutiny of the awarding organisation's website. Our monitoring team visited Signature's head office to conduct interviews with staff and review documentation. Centres were also visited.

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

## **About Signature**

Signature is an awarding organisation that promotes communication with deaf people. The awarding organisation developed out of a communication project funded by the Department of Health. Signature was formally established as the Council for

Advancement of Communication with Deaf People in 1982 by a partnership of organisations working with and representing deaf and deafblind people. For more information on Signature, visit its website at [www.signature.org.uk](http://www.signature.org.uk).

## **Management and governance**

Subject to *The Regulatory Arrangements for the Qualifications and Credit Framework*, August 2008, paragraphs 2.1–2.3, 5.1 and 5.17

### **Findings**

1. Signature is the trading name of CACDP, a company limited by guarantee and a registered charity. (CACDP traces its origins to the Council for Advancement of Communication with Deaf People.) CACDP's objective is the improvement of communication between deaf and hearing people. It achieves this aim through the functions of its awarding organisation, known as Signature.
2. Being a charity and a limited company, the board members are both directors and trustees. The trustees' annual report sets out the corporate governance arrangements and the management structures used to control the delivery of regulated qualifications. Day-to-day executive power is delegated to a chief executive who is the single named point of accountability for all regulated functions.
3. Signature provided us with an organisation chart. We looked at both the terms of reference and the minutes of several relevant committees and were satisfied with their content. Indeed, the terms of reference for the Business Services Committee and the Qualifications Standards Committee were examples of good practice, including many elements that are often omitted, such as quorum and frequency of meeting.
4. We discussed the recent organisational change, which had seen the elimination of the post for Director of Quality and Development. The two remaining executive directors had retained their titles: Director of Marketing and Communications, and Director of Business Services, and we needed to clarify where responsibility for quality assurance lay. This was with the Director of Business. (The Director of Marketing and Communications had responsibility for unit and qualification development.)
5. It was too soon for the impact of these new management and committee arrangements to be evaluated by us. However, they did not raise any immediate concerns.
6. Any potential conflicts of interest were being properly managed. Signature thought that its management of a professional register of communicators may be seen as a potential conflict of interest and it was creating a separately incorporated body to look after it in future.

7. Signature provided us, in confidence, with details of its policy on fees. We were satisfied with the information provided. Signature told us that it was aware of how important its control of costs needed to be. The funding of many of its centres has diminished recently and the level of fees charged by the awarding body was known to be an important consideration.

### **Non-compliance**

There are no instances of non-compliance in relation to this section.

### **Observations**

There are no observations in relation to this section.



## **Resources and expertise**

Subject to *The Regulatory Arrangements for the Qualifications and Credit Framework*, August 2008, paragraphs 3.1, 4.1 and 5.2

### **Findings**

1. We discussed with the Director of Marketing and Communications the procedures Signature had adopted to ensure that its staff and associates had the necessary expertise in the design and development of units and RoC for the QCF. Evidence was provided in terms of CVs of selected staff against job roles and person specifications. Signature employs or contracts with approximately 100 staff and associates, including assessors.
2. There was also information on the training that had been provided in-house, as well as the external training taken up, for example at the Qualifications and Curriculum Development Agency (QCDA), the framework developer. Information from these training events had been cascaded to subject officers. We also noted that Signature had good contact with external stakeholders.
3. We could see that new staff with knowledge of unit development, and experience of assessment and quality assurance, had been brought into the organisation recently, namely a portfolio and projects manager and a qualifications manager. This additional staffing ensures that it is now possible to develop, and separately sign off, units. Staff resources available for this purpose had been mentioned as an issue three months before our monitoring took place in the report on an audit of QCF units carried out by Ofqual staff.
4. Signature has installed a new IT system and its website is an example of good practice, with policies clearly set out for centres. Full use of the computer is made to register both centres and learners. Email is used instead of the post for most communications. Back-up systems for IT are in place, including off-site arrangements.
5. Signature provided us with a copy of the latest audited accounts for CACDP. These set out the trustees' reserves policy to cover day-to-day and exceptional events, and confirmed that the policy had been met. We were satisfied that Signature was aiming to provide sufficient funds to support current and future demands for its services.

## **Non-compliance**

There are no instances of non-compliance in relation to this section.

## **Observations**

There are no observations in relation to this section.

## **Diversity and equality**

Subject to *The Regulatory Arrangements for the Qualifications and Credit Framework*, August 2008, paragraphs 2.11–2.14

### **Findings**

1. Signature has an equal opportunities policy. It is not surprising, given the nature of the qualifications it delivers, that Signature is highly committed to addressing issues of diversity and equality. It operates on the principle that everyone should have the opportunity to take its qualifications. The Director of Communications and Marketing's job description records the responsibility for ensuring the organisation complies with the requirements of the equalities legislation. The Director cascades any amendments in the legislation to the rest of the staff through various communications channels, including email and team meetings.
2. However, Signature maintains a sensible balance on diversity and equality. For example, it does not allow for reasonable adjustments where none is justifiable. There has been a recent review of Signature's reasonable adjustment application procedure in view of changes in the law. This procedure includes requesting all relevant information prior to any decisions being made, even if it means directly contacting the candidate, to ensure that the centre is representing the candidate correctly.
3. All people involved in the qualifications development process are highly committed to making the qualifications as widely accessible as possible, and minimising any barriers to entry. However, due to the nature of its qualifications, Signature has identified justifiable barriers to entry. For example, with regard to British Sign Language qualifications, competence standards require the use of accurate hand-shapes and facial expressions. Candidates must have sufficient manual dexterity and facial movement in order to take such qualifications. Where they exist, barriers are clearly stated.
4. Signature performs various types of consultation, such as face-to-face interactions, surveys and questionnaires, involving learners, tutors, and employers. During annual self-assessment, all the processes and procedures are reviewed and details of how barriers to entry can be mitigated are recorded. Signature's consultation process is an example of best practice.
5. Signature collects information on the gender, ethnic background and sensory status of all candidates upon registration. In the past this information was statistically reviewed and analysed on an annual basis and subsequently provided to us. However, as Signature has not been requested to provide any

further information lately, there has not been any statistical analysis of data of this nature for the past two years.

### **Non-compliance**

There are no instances of non-compliance in relation to this section.

### **Observations**

There are no observations in relation to this section.

## Development of units and rules of combination for qualifications

Subject to *The Regulatory Arrangements for the Qualifications and Credit Framework*, August 2008, paragraphs 3.2–3.4 and 4.2–4.4

### Findings

1. No new units or RoC had been developed since Ofqual's audit of unit and RoC development had taken place in November 2010. Signature had already addressed the weaknesses identified in the report of that audit activity. In particular, Signature had recruited and trained sufficiently skilled staff for independent sign-off for the quality of new units to occur.
2. The regulators' unit databank was always interrogated to seek out existing units, but there were few, if any, equivalents in this area of work. Signature showed us its document *Identifying Demand Through Market Research Processes*, which looked at future product and market development strategies.
3. Signature's Procedure 2 covered its methodology for ensuring accuracy and consistency in determining levels and credit values. Since the November Ofqual audit, Signature had amended the terms of reference of the Qualifications and Standards Committee to include its responsibility for quality assurance and signing off new units.
4. Signature showed us the checklist used to support development work and ensure that all the design requirements specified in section 1 of the QCF regulations are met. The methodology for the review of the continued need for a unit was approved by the November audit and is covered by Procedure 2. Procedure 4 covers the similar process of development and review of RoC.
5. Overall, the processes employed by Signature in unit and RoC development and review meet the regulatory requirements and design specifications. However, there is no evidence yet available of their application to actual development of units and RoC. For this reason some documents read as lists rather than as work-aids and will need to be reviewed when they are used for the first time to turn them into proper working documents.

### Non-compliance

There are no instances of non-compliance in relation to this section.

## **Observations**

6. Signature should review all guidance documents it has produced when they are first used, to ensure their effectiveness as working documents.

## Design and development of assessment

Subject to *The Regulatory Arrangements for the Qualifications and Credit Framework*, August 2008, paragraphs 5.3 and 5.16a

### Findings

1. Signature uses a number of methods of assessment in its qualifications. The largest number of unit certifications comes about through the videoing of a practical demonstration of a skill, which is then submitted to the awarding organisation for viewing and assessment. However, Signature also uses portfolio-based assessments, assignments, multiple choice and written papers. Internal assessment and external assessment are both used.
2. Signature showed us an *Assessment Checklist*, but this has not yet been used. No new developments have occurred since the existing qualifications were converted to the QCF. *Procedure 3*, which is the document setting out the rules, reads more as an outline of what will happen than an instruction manual.
3. Signature has, through its self-assessment process, a vehicle for carrying out annual review of the adequacy of its assessment development procedures.
4. Signature's units and qualifications are not graded.

### Non-compliance

There are no instances of non-compliance in relation to this section.

### Observations

There are no observations in relation to this section.

## Delivery of assessment

Subject to *The Regulatory Arrangements for the Qualifications and Credit Framework*, August 2008, paragraphs 5.5–5.6, 5.9–5.10 and 5.16b

### Findings

1. *Procedure 7C* sets out the quality assurance of assessors' roles and responsibilities, and hence what these are. Signature provided us with some other documentation relating to assessment such as *Assessment Regulations* for the unit on deaf and deafblind awareness, and the level 1 Award in British Sign Language's External Assessor Pack.
2. Evidence was shown to us of Signature running information days to help centres understand their obligations, in connection with assessment delivery.
3. Subject specialists submit assessment instruments and tasks for the approval of the Qualification and Standards Committee. Authenticity of evidence is mentioned in the *Assessment Regulations* for the unit on deaf and deafblind awareness. Candidates must be identified.
4. Pass rates are reviewed each year by unit and against other criteria such as by assessor.
5. Assessors' required expertise is specified and, once assessors are recruited, further training occurs.
6. Little or no information is available on internal assessors' performance. Signature must introduce a full system for monitoring and evaluating the effectiveness of all those involved in internally assessed units.
7. The vast majority of assessments go to Signature for marking and a record of all of these is kept to monitor standards over time.
8. Signature showed us *Procedure 9*, which explains how it deals with exemptions and the transfer of credit. Recognition of prior learning (RPL) is said to be difficult, given the nature of Signature qualifications, but there is a process for ensuring that this can take place. Records of RPL requests and details of their outcomes are held by Signature centrally.
9. Systems are in place to ensure potential conflicts of interest within assessment delivery are appropriately declared and we were provided with evidence of standardisation training (Standard days) that provide on-going quality assurance of assessment. Centre visits suggested that, for internal assessors,



## **Non-compliance**

There are no instances of non-compliance in relation to this section.

## **Observations**

2. Signature should ensure that it can monitor, evaluate and report on the work of all assessors.

## **Centre recognition**

Subject to *The Regulatory Arrangements for the Qualifications and Credit Framework*, August 2008, paragraph 5.11

### **Findings**

1. Signature has two different procedures for centre approval, both of which are based on an online registration process. Centres are requested to create a log-in and password, which gives them access to the Centre's centre portal only. Signature's customer support officers (CSOs) are allocated centres by region and are their main contact point.
2. For qualifications other than NVQs, there is a web-based self-approval application process whereby centres fill in the required information, such as the name of a quality assurance manager, an accounts contact and the units and qualifications it wishes to offer. After completion of all the mandatory fields, automatic approval takes approximately one hour, with no request for any evidence to be supplied by the centre for validation by Signature.
3. Signature is operating an extremely streamlined method of centre approval and renewal. The process is entirely carried out by the centre submitting an email confirming that it has all that is necessary and will conform to regulations. Each year centres self-certificate the same information.
4. Many of Signature's centres are tuition centres that become examination venues, the setting and marking of tasks being assessed centrally. For these centres minimal visiting is sufficient to ensure that invigilation procedures are correctly carried out.
5. However, we noticed that a very small number of centres had been visited in a centre network that was very large. When we carried out a small number of centre visits we found that, despite the quality of Signature's website, the people working there were did not know about important information that is available to them.
6. Some matters were not within the scope of this audit (such as the appeals procedure) and we considered that Signature could usefully review such documents in detail against the regulatory arrangements when it carries out its next self-assessment. However, we were concerned to find centre staff unaware of Signature's published procedures.
7. The regulatory arrangements relevant to centre approval require awarding organisations to 'ensure' that each centre meets detailed criteria. We were not

at all convinced that self-certification with no visits could be construed as 'ensuring' that Signature's centres meet the criteria.

8. Signature must, for those centres where internal assessment occurs, begin a programme of visits or find other means to ensure that its centres meet the criteria. Signature will also find it useful to raise the awareness of its centres on the availability and content of the information on its website.

## **Non-compliance**

1. Signature must provide the regulators with a list of centres where internal assessment occurs. For those centres where internal assessment occurs, a programme of visits or other means must be agreed with the regulators to ensure that Signature can evidence that its centres meet the criteria set out in the regulatory arrangements for the QCF.

*(The Regulatory Arrangements for the Qualifications and Credit Framework, August 2008, paragraph 5.11)*

## **Observations**

3. Signature should look at the information on its website and ensure its policies are compliant with the criteria.

## Awarding and certification

Subject to *The Regulatory Arrangements for the Qualifications and Credit Framework*, August 2008, paragraphs 5.12–5.15 and 5.16c–d

### Findings

1. As for learner and centre registration, Signature makes full use of IT in collecting assessment results and awarding. The results of assessment for one unit – Level 1 Introduction to BSL, where assessments are carried out by centres – are posted directly to the system by the assessors. A sample of these is checked by moderators to ensure that the marks are correct. All other units' results are checked by Signature staff.
2. When information is input to the system by the centre from internal assessment, credit is not automatically awarded to candidates for the particular unit they have achieved. Signature receives an email to say information has been entered by the centre. The customer support officer then follows the *Examination Board Confirmation* process. Results are then issued to the centre. We could not identify this as an adequate system for ensuring the correctness of results.
3. Once the results are input, the system then automatically checks the RoC to ensure that, if the required units of a qualification have been achieved, a qualification certificate is issued. However, the system does not allow for exemptions or RPL. Whilst this may reflect the reality of the present situation, amendment would be required were equivalences to become established.
4. Qualification certificates are issued on a weekly basis and are produced within two weeks of confirmation of completion of a RoC. Credit certificates are issued by Signature upon request and are sent out within two days of a request being received, after the claim has been checked.
5. Replacement certificates must be claimed through the centre. The centre acting as intermediary reduces the likelihood of the awarding organisation being able to control false claims, since the centre has no inherent interest in this matter. The wording 'Duplicate certificate' appears on the replacement. 'Replacement certificate' would be a more accurate description.
6. We noted that credit certificates did not refer to credit being awarded but to a unit being achieved. Signature must amend its certificates in future.
7. Signature carries out a self-assessment exercise on an annual basis by means of which it reviews its qualifications, processes and procedures, to ensure that it

meets the requirements of the QCF regulatory criteria. In respect of its certification arrangements it needs to revisit these procedures.

## **Non-compliance**

2. Signature must improve its system of checking that information from learners' results is correct in order accurately to award credit to learners and avoid mistaken claims.

*(The Regulatory Arrangements for the Qualifications and Credit Framework, August 2008, paragraphs 5.12 and 5.13).*

3. Signature must review the design of its credit certificates to ensure they meet the requirements of Annex C of the regulatory arrangements.

*(The Regulatory Arrangements for the Qualifications and Credit Framework, August 2008, paragraphs 5.13 and Annex C).*

## **Observations**

4. Signature should plan to allow its awarding and certification system to deal with exemptions and recognise prior learning.
5. Signature should use the term 'replacement' rather than 'duplicate' on replacement certificates.
6. Signature should review its awarding and certification procedures before the next annual self-assessment.

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