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# **Awarding body monitoring report**

**National Federation of Property Professionals (NFoPP)**

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October 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' 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. 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**

This is the second monitoring activity on the National Federation of Property Professionals (NFoPP) and was carried out between May and September 2009.

The monitoring focused on the regulatory criteria relating to the following key areas:

- corporate governance
- resources and expertise
- qualifications development – planning, content and design of qualifications
- application of assessment methods – quality assurance and control
- determination and reporting of results
- registration and certification
- enquiries and appeals
- malpractice
- equality of opportunity, reasonable adjustments and special consideration
- customer service statement
- monitoring and self-assessment.

The monitoring activities included desk research of information already held by the regulators, attendance at awarding organisation meetings and scrutiny of the awarding organisation's website. The regulators' monitoring team visited the NFoPP's head office to conduct interviews with staff and review documentation as well as two organisations involved in its assessments.

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

## **About the NFoPP**

The NFoPP is a professional body for those involved in the sale of residential and commercial property (including auctioneers), letting and property management. The NFoPP awarding organisation's predecessor, the National Association of Estate Agents (NAEA) awarding organisation, offered non-accredited qualifications from the early 1990s. It was recognised as an awarding organisation in 2002, changing its name to NFoPP in 2008.

For more information on the NFOPP, visit its website at [www.nfopp.co.uk](http://www.nfopp.co.uk).

## Corporate governance

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

### Findings

1. The regulators did not find the corporate governance arrangements of the NFoPP to be transparent. This was because of the complexity of some statements in the annual report and accounts. The chief executive clarified these.
2. The NFoPP awarding organisation was previously known as the NAEA awarding organisation and the NAEA still exists as a company for technical reasons. Some of the documentation provided as evidence to the regulators is still under the name of the NAEA. In time, for clarity's sake, such references should be changed to read NFoPP.
3. The regulators requested the terms of reference for various committees involved in the running of the awarding organisation, but there was none provided. The way in which the committees operated was described to the regulators verbally. These documents are required as banked documents by the regulators.
4. Similarly, no job descriptions were provided for the two most senior officers of the awarding organisation (the chief executive and the head of membership and professional development). The officers said that the documents were so out of date as to be of no use to the regulators. These documents are required as banked documents by the regulators.
5. The NFoPP must provide its committees with coherent terms of reference and relevant job descriptions for its senior officers. The person nominated as the single point of accountability must have this responsibility recorded in the job description.
6. The NFoPP has three committees that control its qualifications, split as follows: the Domestic Energy Assessment Examination Board; the Technical Award Examination Board; and the Joint Awards Board. Between them, the boards control all the accredited qualifications offered by the NFoPP. Membership consists of subject experts, including academics and practitioners, as well as representatives of the companies contracted to carry out assessments and members of the awarding organisation's administrative team.
7. All these boards report to the Joint Examinations Board. This is effectively the controlling committee for the awarding organisation, although it reports in

turn to the main NFoPP board. The Joint Examinations Board membership includes the chairs of the three subsidiary boards, and the head of membership and professional development. As for the subsidiary boards, there are academics and practitioners represented on the Joint Examinations Board.

8. The regulators examined the minutes of a sample of various boards' meetings and could see that they received reports on, and had discussions about, relevant issues.
9. The NFoPP had trade investments listed in its accounts that involved distance learning and other materials associated with learning. One of these was in association with the sector skills body. The NFoPP shares in the profits on sales of the workbook used for one of its accredited qualifications, but it is not essential material. The candidate does not have to purchase it as examination questions are based on the syllabus, not the workbook. The regulators did not find any evidence of conflict of interest in respect of accredited qualifications.
10. The regulators discussed the NFoPP's policy on setting fees and were provided with the requisite information.

### **Accreditation conditions**

1. The NFoPP must write terms of reference for its committees and job descriptions for its senior officers. The single named point of accountability's job description must have this responsibility recorded in the job description. These documents must be banked with the regulators (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 5a and 6c).

### **Observations**

1. The NFoPP should ensure that all references in its documentation to the NAEA are changed, where appropriate, to the NFoPP.



## 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. Including the two senior officers mentioned in the 'Corporate governance' section of this report, there are five officers administering the awarding organisation. Much of the assessment work is contracted out either through specialists in the field of multiple-choice questions or other agents. Supervision of these activities is shared between the administrators and the various examination boards. The examination boards provide the NFoPP with access to subject experts in the areas it examines, both academic and practitioners.
2. The monitoring activity involved seeing the IT systems in operation when the awarding organisation provided information on processes such as registration and certification. The regulators could see that the IT applications assisted the efficient running of the office in its routine activities. They also provided management information. Systems are backed-up and recovery procedures have been put in place.
3. The regulators did not find any evidence of strain upon the awarding organisation's resources.

### 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 and 43–55.

### Findings

1. The NFoPP has not introduced new qualifications for some time. It handed the regulators a written procedure for the design and development of qualifications into the new Qualifications and Credit Framework (QCF), but no written procedure for the established National Qualifications Framework (NQF).
2. Since any new qualification must now go into the QCF, there was no point in placing any condition on creating a procedure for developing qualifications in the NQF. However, the regulators will track the QCF qualification development procedure being submitted for approval as part of the QCF awarding organisation recognition process.
3. The information given in this section relates to verbal accounts of the process that a new qualification would have gone through in the NQF.
4. The NFoPP advised that the need for a qualification may arise from instances such as changes in legislation (the recent introduction of home information packs is one example) or suggestions from member organisations, for example employers.
5. Employers are present on the various qualification boards, which provide guidance on what the market requires. Additionally, the awarding organisation seeks input from the sector skills council that is able to advise on market trends.
6. The awarding organisation advised that the method of identifying potential qualifications was in practice relatively informal. The NFoPP board of directors had the final say on whether the qualification should go ahead or not.
7. The professional development liaison officer would ensure that the necessary resources were available. These include:
  - sourcing the expertise to write the syllabus
  - contacting the sector skills body to gain support
  - researching national occupational standards (NOS)

- mapping the qualification to the NOS where these exist.
8. The quality assurance of the process is looked at by the head of membership and professional development who agrees the syllabus, and then by the professional development liaison officer who takes over the management of the qualification's development at that point.
  9. There has not been a formal signing-off process for qualifications in the past, but the board's agreement has been recorded in the minutes of its meetings.
  10. Once accredited by the regulator, the qualification take-up is monitored. The anticipated demand for a qualification is calculated by reference to established qualifications. In cases where the expected demand for the qualification has not been met, the qualification has always been withdrawn. This was done by the qualifications team making a recommendation to the qualifications board. The candidates who were registered on the qualification were given time to complete their qualification and the regulators were informed.

### **Accreditation conditions**

2. The NFoPP must submit evidence that its procedure for the design and development of qualifications has been accepted as part of the QCF supplementary recognition process. No new qualifications will be accepted into the qualifications framework until this has been completed (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 6c).

### **Observations**

There are no observations for this section.

## **Application of assessment methods – 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. There are 10 accredited qualifications, but the regulators concentrated mainly on three of them, which account for over 96 per cent of certificates issued in the previous 12 months. The regulators also looked at three other (level 5) qualifications since these were the only qualifications that used one of the three methods of assessment currently used by the NFoPP:
  - multiple-choice questions using e-assessment
  - practical demonstrations/assignments
  - conventional written essays.
2. Two of the 10 accredited qualifications are dormant.
3. There is no internal assessment for any of the NFoPP's accredited qualifications. Multiple-choice questions are used for two of the high-volume qualifications. The NFoPP subject experts create the examination questions. The awarding organisation uses an agency to manage the question bank on its behalf and another to provide the delivery of the questions to examination venues across the British Isles. The regulators were satisfied with the arrangements outlined for multiple-choice examinations, but carried out no substantive tests.
4. The NFoPP contracts with two companies that carry out the assessment of practical demonstrations/assignments. The regulators asked the NFoPP for information on these, such as the qualification for acting as an assessor. This could not be provided so the regulators visited the relevant companies. Although some documentation is in place, the regulators found that the awarding organisation has relied upon its partners to act in accordance with the regulators' requirements rather than stipulating what they should be doing. The NFoPP is responsible and must not only set out its requirements, but check that they are being met. The NFoPP must also visit and carry out checks on these organisations to provide an audit trail for the regulators of awarding organisation monitoring activity.
5. The NFoPP keeps permanent records of all electronic assessments. It also keeps all essays and all projects assessed by one of the two companies it contracts with. The assessments by the other company are kept by that

company, but there was no evidence provided of a formal agreement to indicate how long it would keep them. The NFoPP stated that it had records of all assessment decisions made.

6. Provision over time was being monitored in a number of ways: through continuity of examiners; examination boards' use of statistics provided such as the facility of multiple-choice questions; and external examiners supervising the setting of examination papers.
7. The NFoPP told the regulators that they monitored the work of all examiners and moderators. The system outlined was the application of a hierarchy with examiners being supervised by moderators who in turn were supervised by external examiners. This system was then supervised by the appropriate board person. The NFoPP was unable to produce evidence of any procedure for this activity.
8. English is the language of assessment and the regulators were satisfied that, within the constraints of the jargon used in the trades, plain English was used.
9. The NFoPP was very precise in its instructions to examination venues on the need to positively identify candidates to ensure the authenticity of their work. The regulators noted that candidates were required to vouch for the authenticity of their assignments. The clarity of the instructions and their practicality were considered to be good practice.
10. Assessments were created with clearly expressed pass marks and were checked independently of those creating them. Consideration was given to whether the syllabus was properly covered in the assessments devised. The number of examiners used was not excessive. Samples of their work were carried out to a set formula.
11. The security arrangements for distributing question papers (or equivalent) and collecting answer sheets (or equivalent) were generally sound. There was one uncharacteristic omission and the awarding organisation was addressing this.
12. The NFoPP had no accessible record of any potential conflicts of interests among its assessors/examiners/moderators. This must be created and made capable of being used effectively.
13. A major weakness of the assessment system lies in the mark schemes. An unusual feature is that, although all qualifications are awarded on a pass or fail basis, the mark schemes for many qualifications discuss what makes for a 'good pass' or 'merit' or 'distinction'. Many of the mark schemes are insufficiently detailed to indicate what makes for a particular mark. The

regulators did not see how the mark scheme could be interpreted consistently by both examiner and moderator/second marker.

14. Generic mark schemes are used for individual project work. There needs to be exemplar material to enable examiners/assessors/moderators to understand how these are applied in practice and meet their responsibilities.
15. The regulators noted that on the website there was information for candidates that was puzzling. For example, if the candidate selected two particular qualifications there was the requirement to sit an identical unit again rather than carry it forward into the other qualification. The NFOPP stated that these were inaccuracies of wording.

### **Accreditation conditions**

3. The NFOPP must have procedures in place to monitor the work of examiners, moderators and external examiners in case it needs to remove them from, and reallocate, their work (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 36).
4. The NFOPP must have arrangements for its assessment that:
  - produce clear mark schemes that examiners and moderators can understand
  - complement mark schemes with exemplar material, particularly for generic mark schemes
  - set effective security arrangements for all qualifications
  - provide a system to control potential conflicts of interest among examiners/assessors/moderators (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 58).

### **Observations**

2. The NFOPP should review its statements in documents/websites and eliminate inaccuracies.

## Determination and reporting of results

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

### Findings

1. The regulators' monitoring team had considerable difficulties in this area of the report because, although clear pass marks are set out in the awarding organisation's documentation, the question of whether there were graded qualifications or not took some time to resolve. Frequent references to grades occurred within the NFoPP's own documentation as well as on the National Database of Accredited Qualifications.
2. The regulators' monitoring team accepted that all qualifications were in fact awarded on a 'pass' or 'fail' basis. The NFoPP should ensure that all such misleading references are removed from its documentation and website.
3. The awarding organisation conducts statistical analyses of the performance of its examination papers and individual question bank items over time in order to assess their validity.

### Accreditation conditions

There are no accreditation conditions for this section.

### Observations

3. The NFoPP should remove all references to grades in its documentation and website and have corrected the National Database of Accredited Qualifications.

## Registration and certification

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 11–12, 21–24 and 25.

### Findings

1. The NFoPP does not have any centres other than examination venues. Candidates must register themselves individually and there are three different methods of registering depending on the qualification type.
2. The majority of candidates sitting the level 5 diplomas take their training from one of the two companies that NFoPP works with on assessment. They register for 18 months of tutorial support. Each month, that company provides a list of newly registered candidates to the awarding organisation. The candidate pays that company directly for both the tuition and the examinations.
3. When the candidate is ready for the examination, they book through the NFoPP's online system or by completing a paper form. There are six locations throughout the country for paper-based examinations and 62 for e-assessment examinations. These examination centres have been used for many years by the awarding organisation and while it was thought that accessibility would be available at any of these venues, there was no agreement that documented this requirement.
4. For the level 3 award in domestic energy assessment, candidates are advised to seek training. The awarding organisation works in conjunction with another company, one of three recommended training providers. Following their training wherever it occurs, candidates submit a form to the NFoPP to register for the qualification. Once registered, candidates have a six-month period within which to take all their examinations and pass.
5. The actual examination venues are booked online and the candidate receives an email confirmation. The information about the candidate goes to a contractor handling the multiple-choice operation and venues. Once the candidate has sat the exam, the result is downloaded to the awarding organisation and the candidate record is updated.
6. For the level 3 award in sale of residential property and the level 3 award in residential letting and property management, the candidates study either with another company or independently. They then register through an online system and the information goes to a contractor handling the multiple-choice operation and venues. Once the candidate has sat the exam, the result is downloaded to the awarding organisation and the candidate record is updated.



7. Examination venues are spot checked by NFOPP's contractor. There was no evidence that all examination venues had acknowledged that the regulators had rights of access.
8. All candidates receive a candidate number for the qualification. This is generated by the database. The invigilators who are sourced and paid for by NFOPP have a list of all candidate details and are required to check photographic identification before allowing any candidate access to the examination.
9. The NFOPP has a large stock of certificates that it kept locked away. The NFOPP stated that it would take some time to run down this stock, which had a QCA logo rather than an Ofqual one.
10. Blank certificates had the names of the qualifications pre-printed on them. Whilst there had not yet been an incidence of candidate information being printed on the incorrect blank certificate, this was a risk for the awarding organisation to manage. Currently the system depended upon the accuracy and reliability of individual staff members getting it right. There was no written procedure for checking.
11. Unit certificates did not indicate that the unit formed part of an 'accredited' qualification.
12. Certificates are issued to candidates outside of England, Wales and Northern Ireland. There is currently no information in the NFOPP's literature or website that the regulators' logos on the certificate indicate that the qualification is accredited only for England, Wales and Northern Ireland.

## **Accreditation conditions**

5. The NFOPP must ensure that its examination venues agree to provide the regulators with access to premises, people and records (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 11f).
6. The NFOPP must ensure that unit certificates show that the unit forms part of an accredited qualification (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 22a).
7. The NFOPP must inform its clients that the regulators' logos on its certificates only indicate accreditation within England, Wales and Northern Ireland (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 21b).

## **Observations**

4. The NFOPP should improve its systems that guarantee centres provide accessible premises for all candidates.
5. The NFOPP should write a procedure to check that candidate details are printed onto the correct certificate template.

## Malpractice

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

### Findings

1. The NFoPP has a brief malpractice policy since it does not have centres as such, merely examination venues. The policy covers most essential areas.
2. What is required is an internal policy to ensure that the awarding organisation investigates, in accordance with the regulations, when malpractice is alleged or suspected, particularly alerting the regulators when it suspects that certificates issued may be invalid.

### Accreditation conditions

8. The NFoPP must show the regulators that its malpractice policy obliges it to:
  - carry out a full investigation of allegations or suspicions
  - report to the regulators whenever it finds evidence that certificates may be invalid (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 30 and 31).

### Observations

There are no observations for this section.

## Equality of opportunity, reasonable adjustments and special consideration

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

### Findings

1. The statements required for the equal opportunities, reasonable adjustments and special consideration policy were spread across several documents. Unfortunately, the terminology used by the NFOPP is not in accord with the terminology used in the regulations.
2. The NFOPP presented the regulators with an equal opportunities policy that was written more for employees than for awarding organisation purposes. It should be more specific on linking its equal opportunities statement to the structure and content of qualifications and assessment.
3. As a statement on reasonable adjustments and special consideration, the NFOPP presented the regulators with a disability policy. Confusingly, this document occasionally referred to 'special adjustments'. It only covered a few of the necessary criteria on reasonable adjustments and special consideration. The regulators found more relevant information in the NFOPP's *Guidance notes on examinations complaints and appeals*, including the sections entitled 'Complaints procedure' and 'Appeals procedure'.
4. The regulators found reference in the minutes of a committee to consideration of allowing a candidate to pass without sitting all the units by awarding marks based on the average of those units sat. However, the NFOPP told the regulators that it does not award aegrotats. This needs to be clarified in its special considerations policy.
5. The NFOPP has no procedure in place to monitor and evaluate its use of reasonable adjustments and special consideration to ensure that they are effective, meet the requirements of current legislation and are capable of being shared with the regulators upon request.

### Accreditation conditions

9. The NFOPP must state the minimum evidence that is required to make an aegrotat, even if this is a statement that such awards will not be made (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 19b).

10. The NFoPP must put in place a procedure to monitor and evaluate its use of reasonable adjustments and special consideration to ensure that they are effective, meet the requirements of current legislation and are capable of being shared with the regulators upon request (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 20).

## **Observations**

6. The NFoPP should review its equal opportunities statement to link it with the issues mentioned in criterion 9.
7. The NFoPP should bring together into one document the relevant aspects of its policies that contain information on reasonable adjustments and special consideration, such as the 'Complaints' and 'Appeals' sections of its *Guidance notes on examinations complaints and appeals*. Reference to the Federation of Awarding Bodies' specimen document would also be useful. Criteria 14–16 and 18 will be better stated as a result.

## Customer service

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

### Findings

1. The customer service statement includes most of the information that is required. It does not include the fees (as the customer service statement would need to be revised each time a fee changed), but refers to their availability elsewhere. However, the fees sheet provided to the regulators was created purely for them and did not exist on the website and in the awarding organisation's documentation. This omission must be rectified.
2. The awarding organisation was monitoring its customer service targets set out in the customer service statement. In its self-assessment report it had identified, and included in its action plan, the need for internal procedures, including customer service monitoring. One such procedure was completed during the central systems monitoring. A slight change in its title is necessary to indicate that its scope is as required (ie monitoring of all customer service targets, not just some of them).

### Accreditation conditions

11. The customer service statement must contain or refer to a list of fees that candidates can access (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 32d).

### Observations

8. The N FoPP should ensure that its procedure to monitor all of its customer service targets ensures full coverage of all targets.

## Enquiries and appeals

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

### Findings

1. The published policy on appeals has already been mentioned in this report in the section on 'Equality of opportunity, reasonable adjustments and special consideration'. The content is confusing, not just because of extraneous material, but because of the terminology.
2. The NFoPP has not appreciated the meaning of 'enquiries' in the examinations context. It needs to write an 'Enquiries and appeals' policy, eliminating the items more relevant to complaints, reasonable adjustments and special consideration to give greater clarity. It needs to cover the concept of enquiry about results before appealing.
3. Setting aside the overlap and confusion between different policies, there are certain matters not covered in respect to enquiries and appeals:
  - the appeals procedure must focus on whether procedures used were consistent with the regulatory criteria
  - the procedure does not state that written accounts of the outcomes must be sent to the appellants
  - it must be stated how unresolved appeals can be put to independent review.
4. The NFoPP procedure does not state that, where an appeal is successful, the question of how to deal with other candidates who did not appeal, but were similarly disadvantaged, this needs to be addressed.
5. The NFoPP told the regulators that the minutes of committee meetings confirmed that it had procedures for monitoring, evaluating and reporting on the operation of its enquiry services and appeals arrangements. The regulators did not receive any clear evidence that confirmed this.

### Accreditation conditions

12. The NFoPP must include the following in its appeals procedure:
  - focusing on whether procedures used were consistent with the regulatory criteria
  - sending written accounts of the outcomes to the appellants

- explanation of how unresolved appeals can be put to independent review (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 25).
13. The N FoPP must take steps to protect the interests of all candidates where the outcome of an appeal brings into question the accuracy of results (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 26).

## **Observations**

9. The N FoPP should revise the title and content of its appeals process, covering the concept of enquiries before appealing.
10. The N FoPP should clarify its procedures for monitoring, evaluating and reporting on the operation of its enquiry services and appeals arrangements.



## Monitoring and self-assessment

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraphs 20, 33–35 and 37.

### Findings

1. The NFoPP had encouraged feedback from candidates and employers on its activities. Its self-assessment report had identified a number of weaknesses. However, it had not yet met all the criteria it had signed up to when applying for recognition. It needed to have procedures in place to monitor its compliance with the criteria.

### Accreditation conditions

14. The NFoPP must have procedures in place to monitor its compliance with the regulatory criteria (*The statutory regulation of external qualifications in England, Wales and Northern Ireland* (QCA/04/1293), paragraph 33a).

### Observations

There are no observations for this section.

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