



Qualifications and
Curriculum Authority



Llywodraeth Cynulliad Cymru
Welsh Assembly Government



Rewarding Learning

Post-accreditation monitoring report: Association of Business Executives (ABE)

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Introduction

Regulating external qualifications

Responsibility for regulating external qualifications lies jointly with three regulators:

- the Qualifications and Curriculum Authority (QCA)
- the Department for Children, Education, Lifelong Learning and Skills (DCELLS), the body for Wales
- and the Council for the Curriculum, Examinations and Assessment (CCEA), the authority for Northern Ireland.

Following the accreditation of a qualification, the regulators systematically monitor awarding bodies 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 body is found not to comply with relevant criteria, the regulators set conditions of accreditation. Even if an awarding body is compliant, the monitoring team may make observations on ways that the awarding body 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 bodies 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 bodies to inform decisions on the re-accreditation of qualifications, or, if necessary, the withdrawal of accreditation.

Banked documents

As part of their awarding body recognition processes, the regulators require awarding bodies to submit certain documents to QCA for the purposes of 'banking' centrally. Information from banked documents will be used to inform monitoring activities and may also affect the awarding body's risk rating.

A suite of documents has been identified as suitable for banking and are those that are considered to be most crucial in supporting an awarding body's ability to operate effectively.

To maintain the currency of the banked documents, awarding bodies 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 first monitoring activity on the Association of Business Executives (ABE) and was carried out in March 2008.

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

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

The monitoring activities included desk research of information already held by the regulators, attendance at an awarding body meeting and scrutiny of its website. The regulators' monitoring team visited the ABE head office to conduct interviews with staff and review documentation.

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

About the ABE

The ABE was founded in 1973. The awarding body is currently accredited to offer nine qualifications in business-related areas such as information systems, financial management and human resources. For more information on the ABE visit the website at www.abeuk.com.

Corporate governance

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 5, 6 and 7.

Findings

1. The ABE is a company limited by guarantee. The council is its governing body. Council membership includes eminent people, mainly connected with education, from across the world.
2. Reporting to the council are two committees/teams that control aspects of awarding body activity.
3. The education committee is responsible for advising the council on all issues relating to the ABE's qualifications and monitoring of all related processes. Its terms of reference state that it has been authorised to act on behalf of the council to ensure that the awarding body meets the statutory regulations. Its membership includes many senior academics.
4. Alongside the education committee is the executive team, which has responsibility for the day-to-day running of the ABE. Its members, who include the chief executive officer and departmental heads, also sit on the education committee. The executive team reports both to the council and to the education committee.
5. The chief executive officer is the point of accountability for maintaining the quality and standards of its accredited qualifications. (ABE also offers qualifications that are not accredited.) The chief executive's job description does not have any reference to this responsibility.
6. Reporting to the executive team are the validation committee and the awards committee. The validation committee oversees the creation of question papers and mark schemes. The awards committee's remit covers the post-examination stage. It reviews the raw marks and signs off the results. The membership of the validation committee is very similar to that of the awards committee.
7. The administration of the awarding body is carried out by a team of approximately 25 staff. There is also a team of examiners and subject specialists who are drawn upon as required. An organisation chart for head office staff was provided that showed clear lines of management. The list of examiners provided showed the qualifications for which they were competent.

8. The regulators used the documents that had been banked as part of their desk research activities in preparation for the post-accreditation monitoring. It emerged that some of the banked documents, including those relating to governance, were out of date or had minor inaccuracies (e.g. the executive team being referred to as the executive committee). The ABE said that it would bring its documentation up to date and bank the revised versions.
9. The regulators' monitoring team examined the terms of reference, the last two sets of minutes and membership of the committees. Committees met regularly and had discussions and decisions on relevant issues recorded in their minutes. The regulators' monitoring team considered that the governance and management of the ABE were both robust and transparent.
10. The ABE provided the regulators' monitoring team with a full list of its fees and there were no issues that required further investigation.

Accreditation conditions

1. The ABE must update and bank those documents required by the regulators (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 6c).

Observations

1. The chief executive's job description should include the responsibility for maintaining the quality and standards of all accredited qualifications.

Resources and expertise

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 8 and 10.

Findings

1. The ABE provided full access to its records and staff. The organisation chart showed the distribution of duties and sample CVs were provided. Job descriptions were available for the head office posts. The regulatory monitoring team scrutinised a sample of such information and was satisfied that the ABE possessed the expertise required to carry out the functions of an awarding body. Temporary staff are brought in to cope with peak demand periods. Printing of examination papers is outsourced to a security printer.
2. It was clear that ABE was enjoying rapid growth in its business activities. As a recently recognised awarding body, it was still addressing the issues that had been identified by the regulators as conditions of recognition. The impression given was of an organisation fully committed to meeting the regulatory requirements at a time of considerable change.
3. There was no routine oversight of the awarding body because all parties were fully occupied in the day-to-day running of the organisation. This was understandable given the pace of change but suggested that further resource was required. The result was twofold:
 - activities were not being recorded as procedures that could be repeated
 - outcomes were not being monitored sufficiently.
4. There is no consistent procedure for examiner recruitment yet the ABE depends absolutely on the academic expertise of its programme managers, subject experts and chief examiners/moderators. The ABE stated that they are aware of the need and are looking to put a procedure in place shortly.
5. The methods of recruitment and suitable person specifications were described verbally by awarding body staff. Job specifications and CVs of existing examiners exist, but there are few person specifications. Those in post are suitably qualified and experienced in the administration and assessment of qualifications. Training has occurred as required, including aspects of new legislation and its potential impact on assessment matters. This is an example of an area where the ABE needs to devise a written policy.
6. The minutes of the education committee and of the executive team showed relatively little monitoring information being reported by the awarding body (e.g. the fact that there had

been no appeals over the last two years). Without this information the executive was not prompted to consider whether fees for appeals were too high, appeals information was unclear or that the systems were so good that they did not give rise to any appeals.

7. In the absence of a key member of the IT department, staff take no action on exemption requests based on qualifications from other awarding bodies until the key person returns. This suggests that additional resource is required, at least until the new ways of working have bedded in and deputies have been suitably trained.

Accreditation conditions

2. The ABE must increase or reorganise its staff resource to allow procedures to be recorded (e.g. recruitment) so that future actions will repeat good practice. Training to provide suitable cover for key posts must be carried out. Effective review and monitoring of awarding body activities must be maintained (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 8 and 10).

Observations

There are no observations for this section.

Application of assessment methods: quality assurance and control of independent assessment

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 13, 36, 38–42 and 56–58.

Findings

1. The ABE's qualifications are assessed by means of conventional written examinations of three hours' duration. There is no internal assessment. Each qualification is made up of a number of units and candidates must pass all the units to obtain the overall award.
2. The ABE has recently started a new system of examination paper production to ensure that question papers are fit for purpose. Subject examiners must complete a checklist to confirm that various standards have been met. This checklist must be confirmed by the subject moderator and signed off by the programme chief before the validation committee meeting.
3. As part of the monitoring activity, a member of the regulators' monitoring team was present at a validation committee event where the application of the marking scheme to an examination that had just been sat was discussed by those marking the scripts. As a result of internal procedures not being followed, the questions on the examination paper and on the mark scheme contained minor differences. These were not noticed during the meeting and were drawn to the attention of the awarding body by the regulators.
4. The ABE explained the difficulties encountered with that particular paper and stated that some consultants were no longer used as a result. The regulators' monitoring team recognised that the awarding body had addressed the issue for future examinations but without noticing the residual inconsistencies in this instance. The regulators considered this to be further evidence of the need for greater resource within the awarding body, as mentioned in the previous section on resources and expertise.
5. At the end of each examination the scripts are collected by courier and returned to the ABE, which distributes them to examiners, ensuring that the optimum number of examiners is used. Examiners must mark their first batch within a prescribed time and send ten per cent of them, including borderline scripts, to the moderator for standardisation purposes. The moderator informs the examiners whether or not they may continue to mark. In the case of any serious problem the scripts will be reallocated for somebody else to mark.

6. Once the marking of all the scripts is completed, the examiners must send a further 10 per cent sample back to the ABE, where an external consultant checks them. The consultant writes a report on each examiner's marking. The awarding body uses the reports, along with those from previous sessions, to monitor examiners' performance.
7. The ABE's ability to ensure that standards are maintained over time is hampered by the fact that the awarding body disposes of all candidates' scripts after a six month period. A sample of scripts must be archived each session as evidence of, and to facilitate future, comparability.

Accreditation conditions

3. The ABE must archive a sample of scripts to ensure they are able to monitor standards over time (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 13).

Observations

2. The ABE should devote sufficient resource to ensuring that procedures are followed.

Determination and reporting of results

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 63–67.

Findings

1. The awarding body offers exemptions to candidates for up to six units of qualifications at Diploma level. The ABE maintains an exemptions database which has been put together by programme chiefs conducting a mapping exercise from other awarding bodies' qualifications to the equivalent ABE qualification. Candidates who request exemptions must provide suitable proof of achievement.
2. Candidates do not receive a grade for the overall award, which is passed by the accumulation of success in each unit. However, the ABE unit results are graded from A to E. The awarding body provides a breakdown of the grade bands on its website.
3. Subject examiners and moderators input candidate marks onto a spreadsheet. These results are uploaded to the database by the examination team. The ten per cent of scripts that the ABE receives from each examiner at the end of the marking process are checked against the spreadsheet to sample the correct inputting of marks.
4. Once the results have been returned by the examiners, an awards committee meeting is held. The committee checks statistical data produced from the database to ensure that the results follow expected patterns and correspond with those from previous years. If the committee feels there are any problems with a particular set of results, the programme chief checks the scripts.
5. The methods of amending marks after moderation lacked proper internal audit trails and checks. Moderators are expected to inform the examinations team of amendments to results by updating the results spreadsheets. However, many bypass the system and send emails requesting the changes. This means that a clear audit trail of changes to results cannot be kept. There was the danger that errors could be made and that they would lead to mistaken certification.
6. The remainder of scripts that are not returned to the ABE for moderation are kept by the examiners at their homes for a period of six months before being disposed of. This inhibits the award body's ability to carry out spot-checks to determine whether marking is consistent and accurate because the examiner is in control of the samples provided. The regulators asked the ABE to maintain control of all scripts in future.

7. Candidates are advised that results will be released to them within two months of the examination date. Once the awards committee has confirmed the results, they are uploaded from the database to the website and candidates can gain access to them by using their personal log-on details, which they receive at the time of registration. The learning providers receive a spreadsheet with a list of their candidates' results.
8. The ABE aims to print and send result slips and certificates together. At the time of the monitoring activity, result slips were going out on time but there were delays with certificate production. The ABE had sent a statement to their candidates informing them of this.

Accreditation conditions

4. The ABE must ensure that a clear audit trail is kept of any changes made to candidate results in order to facilitate the monitoring of these changes (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 63f).
5. The ABE must have control over the scripts and be in a position to carry out spot-checks on marking (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 63c and 64).

Observations

There are no observations for this section.

Registration and certification

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 11–12 and 21–22.

Findings

1. Candidate registration is possible in a number of ways. The majority of candidates register via the learning providers but candidates may also register directly with the awarding body, including on-line and by calling at the awarding body's head office. Further registration occurs when a candidate enrolls for an examination.
2. The candidate is provided with a permanent membership number and a session/sitting number for each examination. Both these numbers and the candidate's name appear on the answer sheets.
3. Allocation of individual candidate numbers is automated, not taken from a register manually. Systems are in place to search for existing registrations in case a candidate inadvertently tries to register afresh. Automated controls also prevent candidates enrolling for qualifications unless they meet the entry requirements that apply to the Diploma and Advanced Diploma levels. There is a table of equivalences (the exemptions database) to give exemptions to candidates who already hold certain qualifications.
4. The IT system holds data on candidates, such as gender and ethnicity, and is capable of providing such information to the regulators for central monitoring purposes, if required.
5. Centres play no part in assessment, which is by external examination. Candidates attend examination venues for assessment. The venues are selected and run by the awarding body. Overseas, the awarding body delegates the choice of examination venue in some cases to local representatives. When considering the regulatory criteria relating to centres, the regulators' monitoring team applied these criteria to examination venues where it was desirable to protect candidates.
6. The ABE identifies a person who will take charge of the examination venue on its behalf. It inspects venues from time to time but cannot do so directly for overseas centres on grounds of cost. It relies on its agents to ensure they are suitable.
7. The report form used for examination venue approval is short on detail. The regulators' monitoring team considered that detail was essential in order to protect candidates from suffering sub-standard accommodation.

8. Best practice is to provide clear requirements for lighting, temperature, noise and even spacing of desks. The terms 'sufficient' and 'adequate' on the form leave the awarding body vulnerable to different interpretations, especially in centres overseas that it does not inspect with its own staff. What is required is a minimum specification for its examination venues.
9. The December 2007 sitting was the first assessment of the accredited qualifications. Certificates should have been produced in February 2008 according to the ABE's own target. This deadline had been missed because the new certificate template had not been delivered by the printers.
10. This was fortunate in that the certificate design presented to the regulators' monitoring team was deficient in a number of respects. The title shown was of the previous qualification and not that of the accredited qualification. Regulators' reference numbers and unit titles were incorrect or did not match. The regulators informed the ABE that no certificates must be issued until the format has been corrected.
11. The ABE could not provide evidence that it informs its clients that the regulators' logos on its certificates indicate that the qualifications are accredited for England, Wales and Northern Ireland. The ABE is currently preparing handbooks and will decide whether or not to include this information in them or on other documents, such as the certificates.
12. In addition, the regulators' monitoring team was not satisfied with the controls it saw on non-accredited certificates, this being the only evidence of likely future practice for accredited qualifications. The key to the stock was retained in an unlocked desk, not on the person of the controller. No record of stocks held was kept.
13. Replacement certificates were currently described as duplicates, which would only be true for the first replacement. The word 'replacement' was safer and should be in a position where its removal would be easily seen. The ABE was aware of the need to establish the identity of anyone claiming a replacement.

Accreditation conditions

6. The ABE must ensure that its examination venues provide access for all candidates and have the necessary resources. A sufficiently detailed report must be held before allowing premises to be used for assessment. The ABE must stipulate minimum criteria for examination venues (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 11b and 11c).

7. The ABE must ensure that the design of certificates meets the regulators' requirements and that they are issued without undue delay. Safeguards against fraudulent or mistaken certification must be improved, including basic security procedures being observed. Replacement certificates should be clearly labelled as such and the wording 'replacement' not easily removed (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 22).
8. The ABE must inform its clients that the regulators' logos on the certificate indicate that the qualification is accredited for England, Wales and Northern Ireland (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 21b).

Observations

3. The ABE should ensure that its systems are followed overseas by providing clearer guidelines and reporting forms.

Malpractice

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 28–31.

Findings

1. The regulatory criteria are drafted in the expectation that the awarding body will publish its malpractice procedures to its centres. These centres are independent of the awarding body and need to be told what is required. The ABE has only examination venues. They are not independent of the awarding body. As a result the criteria need some interpretation.
2. The ABE has understood this and sets out its malpractice requirements in its instructions to invigilators and in its own internal procedures for reporting any malpractice to the regulators. The current wording leads to all malpractice being reported to the regulators. This is not strictly necessary, since it is only malpractice leading to invalid certificate issue that needs to be drawn to the regulators' attention.
3. Some amendments to the sanctions were discussed. This is because the document refers to sanctions on centres and these are the examination venues that it controls. The awarding body may rephrase some parts of the document, particularly where it describes the instances of malpractice and their order of gravity. However, the ABE's malpractice procedures meet all the regulators' requirements.

Accreditation conditions

There are no accreditation conditions for this section.

Observations

4. The ABE should revise the wording of sections of its malpractice documentation.

Equality of opportunity, reasonable adjustments and special consideration

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 9 and 14–20.

Findings

1. The ABE has an equal opportunities statement and it is linked to its qualification development documentation. Training on equalities legislation has been provided to ABE staff involved in exam paper production by an external provider. The information from this training session was disseminated to all examiners and the ABE is now considering holding another session for examiners to receive the training directly.
2. The regulatory criteria require that procedures for reasonable adjustments and accessing special consideration are published to centres but the ABE only has examination venues. The ABE does instruct its examination venues on special consideration.
3. All requests for special consideration and reasonable adjustments must be submitted to the quality and assessment manager. Although there is reference to reasonable adjustments on the examination application form, there is no further information for candidates on the procedures involved. In addition, there is no reference to special consideration in any of the documentation sent to candidates. The ABE must ensure that all candidates are able to access this information.
4. There are no internal procedures for dealing with reasonable adjustments and special consideration. Staff at the awarding body described how matters are dealt with. The regulators' monitoring team considered that it would be best practice for the ABE to have a written procedure to ensure consistency of decision making.
5. The ABE has application forms available for candidates who require reasonable adjustments. However, candidates prefer to contact them by telephone to discuss the arrangements. The ABE then asks for written evidence and, if agreed, puts relevant provision into place. A letter of confirmation is sent to the candidate.
6. Where special consideration is requested evidence is also required, such as a medical note. The candidate's paper is marked in the normal way and any special consideration is applied by the awards committee. Aegrotats are not available.
7. The ABE does not have a procedure in place to monitor and evaluate the use of the reasonable adjustments or special consideration.

Accreditation conditions

9. The ABE must publish its procedures on reasonable adjustments to candidates in the absence of centres (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 17 and 18).
10. The ABE must put in place a procedure for the monitoring and evaluation of reasonable adjustments and special consideration (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 20).

Observations

5. The ABE should have internal procedures to ensure consistency in dealing with requests for reasonable adjustments and special consideration.

Customer service

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 32 and 33b.

Findings

1. The ABE stated that it would offer assessment in Welsh or Irish (Gaelige) if there were sufficient demand. This statement is not in the public domain and the ABE should publish this (e.g. in its customer service statement) if it wishes candidates to be aware of its availability.
2. Candidates have a frequently asked questions section on the website which indicates whom to contact with any queries. However, whilst the ABE customer services statement banked with QCA is on the ABE's website, it is not published in any other format. The ABE must publish this document (suitably updated) to its candidates since it cannot be assumed that all have access to the internet.
3. Some feedback is collected through questionnaires sent out to the ABE's e-news subscribers. This group is not necessarily representative of all candidates and ABE should look to obtain opinion from candidates and others on a wider basis.
4. The ABE intends to monitor the customer services provision quarterly through reports to the executive team meetings but these reports have not yet started and there are no procedures to guide staff on how to do this.

Accreditation conditions

11. The ABE must publish its customer service statement to its candidates (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 32).
12. The ABE must have procedures in place to monitor its performance against customer service targets (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 33b).

Observations

6. The ABE should consider including a statement about its willingness to provide assessment in Welsh or Irish (Gaelige) in a published document, such as its customer service statement.
7. The ABE should seek to increase the feedback it receives from a wider audience.

Enquiries and appeals

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 23–27.

Findings

1. The ABE has not had any appeals against assessment or other matters to date.
2. The enquiries and appeals policy appears on the ABE's website and is, therefore, not published to candidates who have no access to the internet. The awarding body had banked an appeals document with the regulators but this was not entirely in accordance with the regulatory criteria's requirements. It referred to another unbanked document (*Enquiries about Results*) without which the first document could not be fully understood.
3. The regulators' monitoring team drew the awarding body's attention to the regulatory requirements and also the impracticability of some of the procedures. For example, the timescale of seven days from issue of results for lodging an appeal was too tight for candidates within the UK, never mind abroad.
4. The definition of independence from the awarding body needs to include not only 'not being a member of the awarding body's board or committees, or an employee or an examiner' but also the time provision of 'in the last seven years'. Acknowledgements of appeals and indications of likely timescales need to be provided.
5. The ABE appeals procedure has more stages than is necessary but this is not a regulatory issue.
6. The appeals process is not annually monitored by the ABE. A monitoring procedure must be put in place.

Accreditation conditions

13. The ABE must publish its enquiries and appeals procedure to candidates (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 23).
14. The enquiries and appeals policy must be drawn up in accordance with the regulatory criteria and be practical (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 23–25).

15. The ABE must have procedures in place to monitor, evaluate and report on the operation of its enquiry services and appeals arrangements annually (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 27).

Observations

8. The enquiries and appeals procedure could be streamlined into two stages instead of three.

Monitoring and self-assessment

This is subject to *The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraphs 33a, 34–35 and 37.

Findings

1. The ABE produced documents that showed it intended improving and amending its procedures and work patterns, especially in respect of control over the examination production process.
2. Similarly, the awarding body took an interest in the template that the regulators use to assist them to assess the level of compliance with the individual regulatory criteria. The ABE had made use of it to produce a portfolio of evidence for the regulators' monitoring team to use.
3. The ABE needs sufficient resource to step back from operational duties in order to carry out self-assessment. At present it is not clear which staff member would be able to do this in addition to their present duties.
4. The awarding body needs to write procedures that ensure it monitors its own compliance with the criteria on a regular basis.

Accreditation conditions

16. The ABE must have procedures in place to monitor its compliance with the criteria (*The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004)*, paragraph 33a).

Observations

There are no observations for this section.