





## Post-accreditation monitoring report: Royal College of Veterinary Surgeons

April 2008

QCA/008/3575

## **Contents**

Introduction	4
Regulating external qualifications	4
Banked documents	5
About this report	5
About the RCVS	5
Corporate governance	6
Findings	6
Accreditation conditions	7
Observations	7
Resources and expertise	. 8
Findings	8
Accreditation conditions	9
Observations	9
Application of assessment methods: the quality assurance and control of internal	
assessment	10
Findings	. 10
Accreditation conditions	12
Observations	12
Application of assessment methods: the quality assurance and control of independent	
assessment	14
Findings	. 14
Accreditation conditions	15
Observations	. 15
Determination and reporting of results	. 16
Findings	. 16
Accreditation conditions	16
Observations	16
Registration and certification	. 17
Findings	. 17
Accreditation conditions	18
Observations	. 18
Malpractice	19
Findings	. 19
Accreditation conditions	19
Observations	19

Equality of opportunity, reasonable adjustments and special consideration	20
Findings	20
Accreditation conditions	21
Observations	21
Customer service statement	22
Findings	22
Accreditation conditions	22
Observations	22
Enquiries and appeals	23
Findings	23
Accreditation conditions	24
Observations	24
Monitoring and self-assessment	25
Findings	25
Accreditation conditions	25
Observations	25

## 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 its 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 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 second monitoring activity on the Royal College of Veterinary Surgeons (RCVS) and was carried out in September and October 2007.

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

- corporate governance
- resources and expertise
- application of assessment methods
- determination and reporting of results
- · registration and certification
- malpractice
- equality of opportunity
- customer service
- enquiries and appeals
- monitoring and self-assessment.

The monitoring activities included desk research of information already held by the regulators including the previous monitoring report and most recent Awarding Body Recognition Update (ABRU) submission, visits to centres and related veterinary training practices, attendance at awarding body meetings and scrutiny of its website. The monitoring team visited the RCVS head office to conduct interviews with staff and review documentation.

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

## About the RCVS

The RCVS was founded in 1844 by Royal Charter to be the governing body of the veterinary profession. The awarding body of the RCVS is accredited to offer veterinary nursing qualifications. For more information on the RCVS and its awarding body visit the website at <a href="https://www.rcvs.org.uk">www.rcvs.org.uk</a>.

## **Corporate governance**

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

- The governing body of the RCVS is its council. Beneath the council are a number of subsidiary groupings, one of which is the RCVS Veterinary Nurses Council. Reporting to the RCVS Veterinary Nurses Council is the Awarding Body Management Board, which runs the RCVS awarding body. The awarding body's corporate governance arrangements are robust and transparent, and the awarding body does not have any partnership or franchise arrangements.
- 2. The awarding body shares a number of functions with other parts of the RCVS. For example, the central database contains information relevant to the RCVS awarding body and relevant to the RCVS in its capacity as regulator of the profession. The awarding body is well aware of its responsibility to be independent of its parent body wherever a potential conflict of interest may arise.
- 3. As part of the awarding body's rolling internal audit process, carried out by the RCVS's head of finance, it was stated that the awarding body should have a set of separately identifiable strategic objectives and targets. It is therefore clear that the desire to keep the two organisations independent of each other is a mutual endeavour.
- 4. The regulators' monitoring team did not find any conflict of interest. It could see that the aims of the awarding body (for example, in its emphasis on training quality) were clearly in the majority of candidates' best interests. It would be clearer, however, if the *Candidate Handbook* were revised so that candidates are told what is needed to achieve the qualifications, and, separately, what is needed for membership of the Royal College of Veterinary Surgeons. This blurs the distinction between the awarding body function and the other functions of the Royal College of Veterinary Surgeons.
- 5. Whilst intending to create a seamless path from qualification achievement to membership of a professional body, the requirements can create confusion for candidates and others, particularly if already familiar with the qualification framework in other areas. For example, candidates should be at liberty to enrol for individual qualifications.

- 6. The *Candidate Handbook* was confusing to a first-time reader in places as statements in one section appeared to contradict those in another.
- 7. The awarding body provided all necessary information requested by the regulatory monitoring team, including information on fees.

## **Accreditation conditions**

1. The *Candidate Handbook* should be revised to clarify apparently contradictory statements, including differentiating between qualification requirements and RCVS membership conditions (*The statutory regulation of external qualifications in England, Wales and Northern Ireland*, paragraphs 5d and 65).

## **Observations**

## Resources and expertise

This is subject to The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004), paragraphs 8 and 10, and The NVQ Code of Practice (2006), paragraphs 1, 4, 5, 19 and 71.

- 1. The RCVS awarding body head office is not a large organisation and shares some staff with the RCVS. The team of external verifiers (EVs) is particularly small, given the large number of satellite assessment sites attached to some of its centres. There is a policy of only visiting such assessment sites once every 7 years, which is discussed elsewhere in this report under 'Application of assessment methods: the quality assurance and control of internal assessment'. The regulators' monitoring team was satisfied that staffing resources are adequate to meet current levels of activity.
- 2. Communication within the awarding body is effective. All staff are aware of relevant awarding body business. Training and standardisation meetings for examiners and EVs are regular events and fully minuted. There is a 3-day standardisation event for examiners, which assessors attend as part of their continuing professional development. There is also an annual standardisation day for existing examiners. The EV team meets once a month.
- 3. The RCVS awarding body uses its examiners to set the multiple choice questions that make up the question bank for vocationally related qualifications (VRQs). The question bank is of an appropriate size and is regularly reviewed against the syllabus. The marking of the paper answer sheets is contracted out to another awarding body. The RCVS awarding body is exploring ways of making the process electronic. It is also aiming to make the examination more accessible to candidates by extending the number of examination centres.
- 4. Currently, the RCVS awarding body is experiencing problems with its database and this is slowing up certain awarding body activities. Centres commented on slower turnaround times for registration and certification, and the difficulties this caused them and their candidates. The RCVS awarding body is attempting to address the problems that arose out of the simultaneous loss of established IT staff and the implementation of an upgrade to the system. RCVS awarding body staff are doing their utmost to contain and resolve any difficulties identified. However, if the current problems are not resolved shortly this will impact

on customer service as well as external verification (see later in this report under 'Application of assessment methods: the quality assurance and control of internal assessment').

- 5. The regulators' monitoring team noticed that although EVs are given an EV handbook, which includes a job description, there is no specific EV Code of Practice issued to them. This is a regulatory requirement and includes the need for EVs to sign their acceptance of the Code's provisions and agree to be bound by it.
- 6. The regulators' monitoring team examined the job descriptions and CVs of selected staff and found these to be in order. Recruitment and training procedures ensured that the necessary competences were available to the awarding body.

### **Accreditation conditions**

- The RCVS awarding body must develop an EV Code of Practice and ensure that all its
  current and future EVs confirm acceptance of its provisions in writing and agree to comply
  with them (*The NVQ Code of Practice 2006*, paragraph 4).
- 3. The RCVS must report to the regulators on its progress in resolving its data processing difficulties and ensure they are quickly resolved to support centres, candidates and EVs (The statutory regulation of external qualifications in England, Wales and Northern Ireland, paragraph 8 and The NVQ Code of Practice 2006, paragraph 61).

#### **Observations**

## Application of assessment methods: the quality assurance and control of internal assessment

This is subject to The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004), paragraphs 13, 36, 56, 57, 59, 60–62, and The NVQ Code of Practice (2006), paragraphs 40–70 and 72.

- 1. The RCVS awarding body offers four qualifications: a level 2 and a level 3 NVQ in veterinary nursing; and a level 2 and a level 3 VRQ certificate in veterinary nursing theory. The qualifications are not graded, although one unit within the level 2 VRQ is. Internal assessment occurs in the usual way for the NVQs plus an additional assessment by the internal verifier of one of the units at level 2 (VetN3 providing nursing care to animals). This is termed 'enhanced internal verification'. There is also internal assessment for one of the units of the level 2 VRQ (VNT1) via an assignment that is marked by the course tutor and moderated by the NVQ EV. The awarding body discourages peripatetic assessors so that people familiar with the candidate's work carry out assessment of NVQs in the workplace.
- 2. The regulators' monitoring team questioned the concept of an internal verifier reassessing a candidate in a level 2 NVQ. This is said to be necessary because it assesses the fundamental skill of veterinary nursing despite already having been assessed by a workplace-based assessor. (The level 3 NVQ has no enhanced internal verification as it includes independent practical tests.) Some centres that are familiar with other NVQs found the practice strange, and almost a vote of no confidence in the NVQ system.
- 3. The RCVS awarding body considered that enhanced internal verification was not a reassessment since it only involved a sample of the candidates. The awarding body believed such verification was crucial to quality assure and standardise assessors rigorously. The unit subject to enhanced internal verification is central to the veterinary nurse's role. The activity was clearly part of quality assurance and had been accepted as such by the regulators' accreditation team.
- 4. The tutor-assessed assignment was bedding in. Some centres had difficulties in assuring standardisation of marking given their geographic reach. They had marked and re-marked

papers and then moderated them before submitting to the EV's moderation. This suggests that the mark scheme should have been augmented by exemplars.

- 5. Some centres had lost sight of their candidates' assignment when it was done at a different centre (despite having to sign off its successful completion when claiming the certificate). This illustrates one of the unnecessary complexities of linking the four qualifications mentioned earlier in the report (see paragraph 4 of Corporate governance). Fortunately, the procedural error found (centres signing off certification claims blind) had no detrimental effect as this was an unnecessary step, the awarding body already having the correct record of VRQ performance in its files.
- 6. The regulators' monitoring team found no fault with the internal assessment but it was taking centres some time to become familiar with it. Candidates reported an anomaly on their assignment. Some said they were not even aware that it counted towards the qualification. Others regretted not having failed the assignment on first submission instead of achieving a bare pass. Their colleagues who failed were given feedback that enabled them to get a distinction when they re-submitted. The awarding body should review its guidance in this area.
- 7. Centre visits by the regulators' monitoring team showed a high standard of record keeping and external verification. Sampling policies and activities were clearly set out and could be audited. Feedback to the centres after visits was thorough. Communication between centres and awarding body was frequent and in both directions.
- 8. Centres visited were aware of the need to keep records and the requirements were outlined in the *Centre Handbook*. There was clarity on occupational competence as well as assessor/verifier qualification requirements. The checking of unqualified assessors' and verifiers' work was equally clearly specified. The *Centre Handbook* was well written and clear. Although the *Candidate Handbook* was considered unclear in some areas, as already reported in the Corporate governance section of this report, it set out the assessment specification in detail.
- 9. The work of examiners and EVs was monitored. There was a very small team of EVs and accompanied visits occurred regularly. Despite this, centres commented that there was a lack of consistency amongst the EVs. However, the structure of many centres was highly complex. Typically, a centre consists of a dozen or more satellite assessment sites known as

training practices. Candidates may be attending other centres for their VRQs, as veterinary practices do not wish to release all candidates on the same day. Given the complexity, the regulators' monitoring team considered that the awarding body's systems and procedures ensured that results were reliable.

- 10. The RCVS awarding body had set up training programmes for its staff and centres that ensured continuous development. Its training had attracted the attention of overseas organisations, who were enrolling their staff for attendance on bespoke courses.
- 11. The regulators' monitoring team debated the wisdom of only aiming to visit one-seventh of a centre's assessment sites in any year. One centre had over 250 active assessment sites. The awarding body operates a risk assessment strategy and has no hesitation in expanding the sample of assessment sites where it suspects that it may be required. Were the awarding body's systems less rigorous, the regulators' monitoring team would have imposed an accreditation condition. Instead, there is only an observation that, as long as current standards of performance by the awarding body are maintained, all centres' assessment sites must be visited at least once during the lifetime of the qualification, subject to this system being justified by the risk assessment.
- 12. It is vital for the strategy of assessment site visits that EVs are provided with accurate information on their centres. To this end, the resolution of the problems with the awarding body's database commented upon already in this report, and made an accreditation condition under the heading of 'Resources and expertise', is an urgent requirement.

## **Accreditation conditions**

4. The RCVS awarding body must review the marking of the assignment in the level 2 VRQ and provide centres with exemplars (*The statutory regulation of external qualifications in England, Wales and Northern Ireland*, paragraph 59).

#### **Observations**

- The RCVS awarding body should keep under review the necessity for enhanced internal verification.
- The RCVS awarding body should remove all unnecessary certifying of results when claiming certificates.

- 3. The RCVS awarding body should review its guidance to candidates and assessors on the assignment so that candidates who scrape a bare pass are not disadvantaged against those who fail and resubmit with the possibility of a higher grade.
- 4. The RCVS awarding body should monitor centre comment upon EV consistency to see if any improvements can be made.
- 5. The RCVS awarding body should maintain its present level of rigour and risk assessment or revert to a normal level of visits to assessment sites in a calendar year.

# Application of assessment methods: the 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, 56–58.

- 1. The RCVS awarding body uses multiple-choice examinations in both its VRQs and has practical examinations in its level 3 NVQ to provide independent assessment in its qualifications. The regulators' monitoring team attended an examiners' meeting and a subsequent meeting of the awarding body management board where results arising from changes to the practical examination were discussed in detail. It also looked at the question bank used to create the multiple-choice examination but was unable to attend any of the practical examinations.
- All assessment records are currently retained indefinitely and the records of all independent
  assessments were available for audit. The regulators' monitoring team inspected a selection
  of these records against the procedures that the awarding body has for these activities and
  found them to be in order.
- 3. Multiple-choice questions are written by veterinary nurses and surgeons familiar with the subjects, and independently checked and signed off by subject-competent examiners who have received training in the writing of multiple-choice questions. There is a large question bank for both level 2 and level 3. Outside agencies are employed to create the question papers, mark the answer sheets and then carry out statistical analysis of the results. These are looked at critically by examiners and other members of the awarding body management board.
- 4. For both the practical examinations and the multiple-choice examinations, the awarding body provides exemplar questions on its website. The questions and answers are kept secure (the question bank is password protected) and the examinations take place currently at a relatively limited number of geographically spread centres. At present, there is no multiple choice examination centre in Wales, for example. The awarding body is studying how, in future, candidates can be given a greater choice of venues and occasions to take these examinations.

5. An improvement to procedures would be to check the input to the question bank of the agreed question and answers. The awarding body indicated that it was going to implement this improvement immediately.

## **Accreditation conditions**

5. The RCVS awarding body must ensure that all input to the multiple-choice question bank is checked and evidenced as checked (*The statutory regulation of external qualifications in England, Wales and Northern Ireland*, paragraph 56).

## **Observations**

6. The RCVS should continue to explore methods of making its examinations more accessible to candidates across England, Wales and Northern Ireland.

## **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 regulators' monitoring team attended meetings and was provided with evidence that the RCVS awarding body gives considerable and appropriate attention to how pass marks are established. For example, in the past it has considered whether the examination sitting in the winter has different characteristics of candidature (due to re-sits) from the summer.
- The awarding body investigates apparent anomalies. In particular, it has been checking for any differences that have emerged between the 2002 syllabus that is coming to an end and the 2006 syllabus. The awarding body management board is particularly vigilant in this respect.
- 3 Technical support to the awarding body is provided not only by experts in the subjects but is augmented by consultants familiar with statistical analysis. The basis on which decisions are made was open to monitoring.
- 4. Aggregation of results is clear (subject to earlier comments about improving the explanations in the *Candidate Handbook*). The regulators' monitoring team considered that the awarding body's systems and procedures ensured that results were reliable.

## **Accreditation conditions**

There are no accreditation conditions for this section.

## **Observations**

## Registration and certification

This is subject to The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004), paragraphs 11–12, 21–22, and The NVQ Code of Practice (2006), paragraphs 6–18, 20–30.

- Although the majority of requirements for centre and candidate registration and certification
  were met, there were areas where the RCVS awarding body needed to make small changes
  to its existing systems. For example, when approving and renewing approval of centres, it
  had nothing explicit to ensure that its centres provide the regulators with access.
- Despite the difficulties the RCVS awarding body was suffering with its database, which have already been referred to, it was able to provide the regulators' monitoring team with all information requested. There was evidence that the data it had was used in its monitoring activities.
- 3. Centre visits revealed, however, that large centres with more than one location for assessment had unreliable internal records. Satellite sites visited by the regulators' monitoring team proved that the inconsistent record keeping identified, lay with the head office (centre) failing to take note of changes advised to them.
- 4. Candidates outside England, Wales and Northern Ireland receive the same certificate upon completion of the qualification as those within these three countries. There is no reference to the fact that the regulators' logo on certificates indicates that the qualification is accredited only for England, Wales and Northern Ireland.
- 5. Some certificates were found to be out of date in that they must bear the signature of the single named point of accountability for the qualification. The awarding body was aware of this requirement and had asked for it to be implemented but had overlooked checking that it had been properly completed for all qualifications.
- 6. There was no evidence that centres had been informed in writing of their approval to deliver each NVQ.

7. NVQ centres are approved to operate only within England, Wales and Northern Ireland. Where centres want to deliver NVQs outside these countries, they must seek separate approval for each centre. There were a number of centres operating across national boundaries and no separate approval had been provided.

### **Accreditation conditions**

- 6. The RCVS awarding body must show it has procedures that ensure its centres agree to provide the awarding body and regulators with access to premises, people and records (*The statutory regulation of external qualifications in England, Wales and Northern Ireland*, paragraph 11).
- 7. The RCVS awarding body must ensure that it informs its clients that the logos on the certificates it awards to candidates outside England, Wales and Northern Ireland indicate that the qualification is accredited only for England, Wales and Northern Ireland (*The statutory regulation of external qualifications in England, Wales and Northern Ireland*, paragraph 21b).
- 8. The RCVS awarding body must ensure that the certificates it issues bear the signature, printed name and title of the single named point of accountability at the awarding body (*The statutory regulation of external qualifications in England, Wales and Northern Ireland*, paragraph 22a and Appendix 5).
- The RCVS awarding body must ensure when it approves a centre to deliver an NVQ, that
  the centre is informed in writing for each NVQ concerned (*The NVQ Code of Practice (2006)*,
  paragraph 15).
- 10. The RCVS awarding body must ensure that any centres operating outside England, Wales and Northern Ireland have been given separate approval (*The NVQ Code of Practice* (2006),paragraph 25).

### **Observations**

The RCVS should continue to monitor its centres carefully and ensure their records are accurate.

## **Malpractice**

This is subject to The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004), paragraphs 28–31, and The NVQ Code of Practice (2006), paragraphs 73–81.

## **Findings**

- The RCVS has established procedures for dealing with malpractice and ensures that its
  centres report any instances that they find. There have been very few instances in recent
  years and these have usually involved candidates, not centres. Where instances have
  occurred, the RCVS and its centres have dealt with them in accordance with the severity of
  the incident.
- The RCVS seeks to assure itself that centres are following procedures and the issue of
  malpractice is a standard item on all its centre report forms, including occasional spot-checks
  as well as routine visits. It liaises closely with the regulators and understands its obligations
  to report if certification were compromised.
- To improve the avoidance of malpractice and enhance its detection the RCVS has made
  malpractice an item on the induction programme for all staff, including EVs. From time to
  time a visiting speaker has made a presentation to awarding body staff on the subject of
  malpractice.
- 4. EVs are fully informed on the RCVS sanctions policy and its application. The regulators were fully satisfied that the RCVS awarding body manages its malpractice policy with integrity and avoids any potential conflict of interest between the RCVS's other activities and any investigation of its customers.

## **Accreditation conditions**

There are no accreditation conditions for this section.

#### Observations

## 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, 14–20, 38–42, and The NVQ Code of Practice 2006), paragraphs 2, 3 and 39.

- The RCVS has a suitable equal opportunities policy and satisfactory arrangements for
  reasonable adjustments and special consideration. The awarding body keeps up to date on
  relevant legislation and cascades this to centres and staff as appropriate. The RCVS stated
  that requests for reasonable adjustments had increased over time as candidates became
  more aware of their rights.
- There are standard dispensations for internal assessments to be modified. EVs check these, although there is no specific question on the EV's report. Assessors tend to work with the candidate in all cases and, therefore, reasonable adjustments are handled as a matter of course.
- 3. Reasonable adjustment requests for examinations were backed up, if necessary, by medical reports and the awarding body kept records of these. Use was made of the Federation of Awarding Bodies' guidance in handling such requests. The RCVS was aware of the need to provide reasonable adjustments whilst maintaining the integrity of the assessment.
- 4. The RCVS has little influence on the diversity of candidates as they are pre-selected by their employers but it collects data and ensures this is reported to its committees from time to time but not on a regular basis. Candidates must meet an age requirement as there are legal requirements for working with radiation on X-rays.
- Overall the application of reasonable adjustments and special consideration by the RCVS
  was considered to be fair. Nevertheless the regulators' team considered that the wording of
  the RCVS's policies in respect of candidates with disabilities could be improved.
- 6. The emphasis appears to be on excluding people from starting in the profession and some statements read negatively. Many conditions that do not appear to present problems for other awarding bodies are singled out, for example dyslexia, history of drug abuse, the

inability to develop a capacity for self-appraisal, lack of strength and stamina, wheelchair users, all of which are felt to make prospective candidates unlikely to be suited to veterinary nursing as a career. However, the same document later quotes from the Disability Discrimination Act: 'a responsible body should not be looking for reasons or excuses to discriminate against disabled people or students'.

- 7. The awarding body recognises that it gives little flexibility to candidates with disabilities but feels it is justified by the nature of the job. Veterinary nurses are often left alone in the practice and therefore have to deal with all kinds of situations. The RCVS felt confident that it could justify the stated requirements and quoted examples of amputees and deaf candidates who had been admitted to study for the qualification.
- 8. During centre visits the regulators made a point of asking people at all levels of the industry (including candidates, assessors, veterinary nurses and veterinary surgeons) whether they thought that a veterinary nurse had to be physically able in order to work with animals effectively. The feedback was, universally, that near-perfect physicality was required.
- 9. The RCVS monitored its arrangements for reasonable adjustments and special consideration, and gave thought to ensuring they complied with current legislation.
- 10. No aegrotat is awarded in any circumstances as it is considered essential to assess proficiency in working with animals before allowing a candidate to practice.
- 11. The awarding body has never received requests for assessments through the medium of Welsh. It was stated that Wales is predominantly a mixed farming community and therefore less likely to employ veterinary nurses. There is currently no centre in Wales but the impact of this will diminish as the RCVS moves towards e-assessment.

## **Accreditation conditions**

There are no accreditation conditions for this section.

#### **Observations**

8. The RCVS should reword its reasonable adjustments statement.

## **Customer service statement**

This is subject to The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004), paragraphs 32 and 33b, and The NVQ Code of Practice (2006), paragraph 33.

## **Findings**

- The RCVS awarding body has a satisfactory customer service statement. It incorporates
  internal targets for service provision and is published widely via centre handbooks, student
  handbooks and the RCVS website.
- 2. The performance against targets is reviewed at departmental meetings. This enables the awarding body to track its provision and encourage individual staff to take ownership of the service. Minutes of the departmental meetings are maintained.
- 3. Centre feedback is sought via questionnaires and issues are pursued. This contributes to the response rate to the questionnaires being good and is seen as good practice.
- 4. The RCVS has been subject to problems with its database, as was mentioned in the sections above on 'Corporate governance', 'Resources and expertise' and 'Application of assessment methods: the quality assurance and control of internal assessment'. This has led to delays in issuing registration confirmations and certificates, and problems for candidates switching from the old syllabus to the new. As mentioned in the earlier sections, it is imperative that this problem is resolved as quickly as possible and an accreditation condition on the subject appears in the Resources and expertise section.

#### Accreditation conditions

There are no accreditation conditions for this section.

#### **Observations**

## **Enquiries and appeals**

This is subject to The statutory regulation of external qualifications in England, Wales and Northern Ireland (2004), paragraphs 23–27, and The NVQ Code of Practice (2006), paragraphs 31–32.

- The RCVS awarding body has an enquiries procedure, although this is not made explicit in their appeals documentation. Those candidates wishing to seek a check on their marks are asked to write to the awarding body with details. For the multiple-choice question paper there is a £10 fee for this service.
- 2. The appeals procedure is not entirely in accord with the statutory regulations. The RCVS awarding body does not appear to be entirely in control of the appeals process. References infer that the procedure is applicable to the RCVS and supervised by one of its committees. Candidates are advised to appeal to QCA or seek judicial review, neither of which is appropriate.
- 3. There needs to be an independent element in the appeals process and the awarding body believes this is provided by the appeals panel having no-one from the awarding body, as stated in the wording of the statutory regulations. However, all the members of the appeals panel have links to the RCVS, which owns the awarding body. No candidate in dispute would accept that this was true independence.
- 4. In addition to the independent element, there needs to be a clear process for putting those cases where the appellant rejects the findings of the appeals panel to independent review. The RCVS awarding body has no such process, other than judicial review or appeal to the Privy Council, which, in the context of assessments, is likely to deter the average candidate from appealing further.
- 5. The regulators' monitoring team accepted that the RCVS awarding body would take steps to protect the interests of all affected candidates where an appeal by one candidate brought into question the accuracy of results. The statutory regulations do not explicitly require a procedure but it was felt that the inclusion of a reference to this needed to be embodied somewhere, in case the current staff, who are aware, moved on.

- 6. Appeals are monitored and evaluated. There is an item on this subject in the RCVS Annual Report. Appeals are also mentioned at examiners' meetings and used as part of the examiners' training activities.
- 7. RCVS do not currently make any charge for appeals.

## **Accreditation conditions**

11. The RCVS must explain in the appeals procedure how unresolved appeals can be put to independent review (*The statutory regulation of external qualifications in England, Wales and Northern Ireland*, paragraph 25e).

### **Observations**

- 9. The RCVS awarding body should make reference to there being an enquiries procedure on the appeals policy.
- 10. The RCVS awarding body should explain in the appeals procedure how it involves an independent person on the appeals panel who has no past or present links with either the awarding body or the RCVS.
- 11. The RCVS awarding body should include a statement on their appeals policy to the effect that where the outcome of an appeal brings into question the accuracy of other results, the awarding body will take steps to protect the interests of all candidates, the integrity of the qualification and the integrity of the National Qualifications Framework.

## 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, and The NVQ Code of Practice (2006), paragraphs 34–38.

## **Findings**

- 1. The RCVS awarding body has an arrangement with the Royal College of Surgeons' head of finance to sample some of the awarding body's activities and produce a self-assessment report each year. This outside view is good practice and is carried out well but it will take several years for all the criteria to be covered in this way as it examines only three a year.
- The RCVS awarding body should consider whether this process could be complemented by a lower level full self-assessment on an annual basis and this may be achieved by the RCVS awarding body's self-assessment report, the first of which is due to be sent to QCA in March 2008.
- Reasonable adjustments, customer service and malpractice are all monitored and reported
  on at least annually to the awarding body management board. EVs monitor centres and
  written reports are submitted both to the centres and the RCVS head office.
- 4. The regulators' monitoring team was satisfied that the RCVS awarding body is carrying out monitoring and reporting on the results to the relevant boards and committees.

## **Accreditation conditions**

There are no accreditation conditions for this section.

#### **Observations**

12. The RCVS awarding body should ensure that it regularly checks each of the regulatory criteria to see that they are being met.