

Ensuring appropriate centre controls

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Aspects of centre controls



Ofqual's statutory objectives

1. To secure qualifications standards
2. To promote National Assessments standards
3. To promote public confidence in regulated qualifications and National Assessments arrangements
4. To promote awareness of the range and benefits of regulated qualifications
5. To secure that regulated qualifications are provided efficiently

What do the Conditions say?

Condition C1 - Arrangements with third parties

C1.1 Where an awarding organisation arranges for a third party to undertake, on its behalf, any part of the development, delivery or award of qualifications which the awarding organisation makes available, or proposes to make available, the awarding organisation must –

- (a) ensure that the arrangements which it establishes with that third party enable the awarding organisation to develop, deliver and award qualifications in accordance with its Conditions of Recognition, and
- (b) monitor and, where appropriate, enforce such arrangements so as to ensure that it is able to develop, deliver and award qualifications in accordance with its Conditions of Recognition.

What do the Conditions say?

Condition C2 - Arrangements with Centres

C2.1 Where a Centre undertakes any part of the delivery of a qualification on behalf of an awarding organisation, this condition applies in addition to the requirements in Condition C1.

C2.2 Where this condition applies, an awarding organisation must ensure that arrangements between it and the Centre include a written and enforceable agreement.

What do the Conditions say?

C2.3 That agreement must in particular include provisions which –

- (a) require the Centre to take all reasonable steps to ensure that the awarding organisation is able to comply with its Conditions of Recognition,
- (b) require the Centre to take all reasonable steps to comply with requests for information or documents made by the awarding organisation or Ofqual as soon as practicable,
- (c) require the Centre to assist the awarding organisation in carrying out any reasonable monitoring activities and to assist Ofqual in any investigations made for the purposes of performing its functions,
- (d) set out all the requirements with which the Centre must comply in order to continue to deliver the qualification,

What do the Conditions say?

- (e) establish a sanctions policy to be applied in the event that the Centre fails to comply with these requirements,
- (f) require the Centre to retain a Workforce of appropriate size and competence to undertake the delivery of the qualification as required by the awarding organisation,
- (g) require the Centre to have available sufficient managerial and other resources to enable it effectively and efficiently to undertake the delivery of the qualification as required by the awarding organisation,
- (h) require the Centre to undertake the delivery of the qualification required by the awarding organisation in accordance with Equalities Law,
- (i) require the Centre to operate a complaints handling procedure or appeals process for the benefit of Learners,

What do the Conditions say?

- (j) set out any Moderation processes that the awarding organisation will undertake or that will be undertaken on its behalf,
- (k) specify a process to be followed in any withdrawal of the Centre (whether voluntary or not) from its role in delivering a qualification, and
- (l) require the Centre to take all reasonable steps to protect the interests of Learners in the case of such a withdrawal.

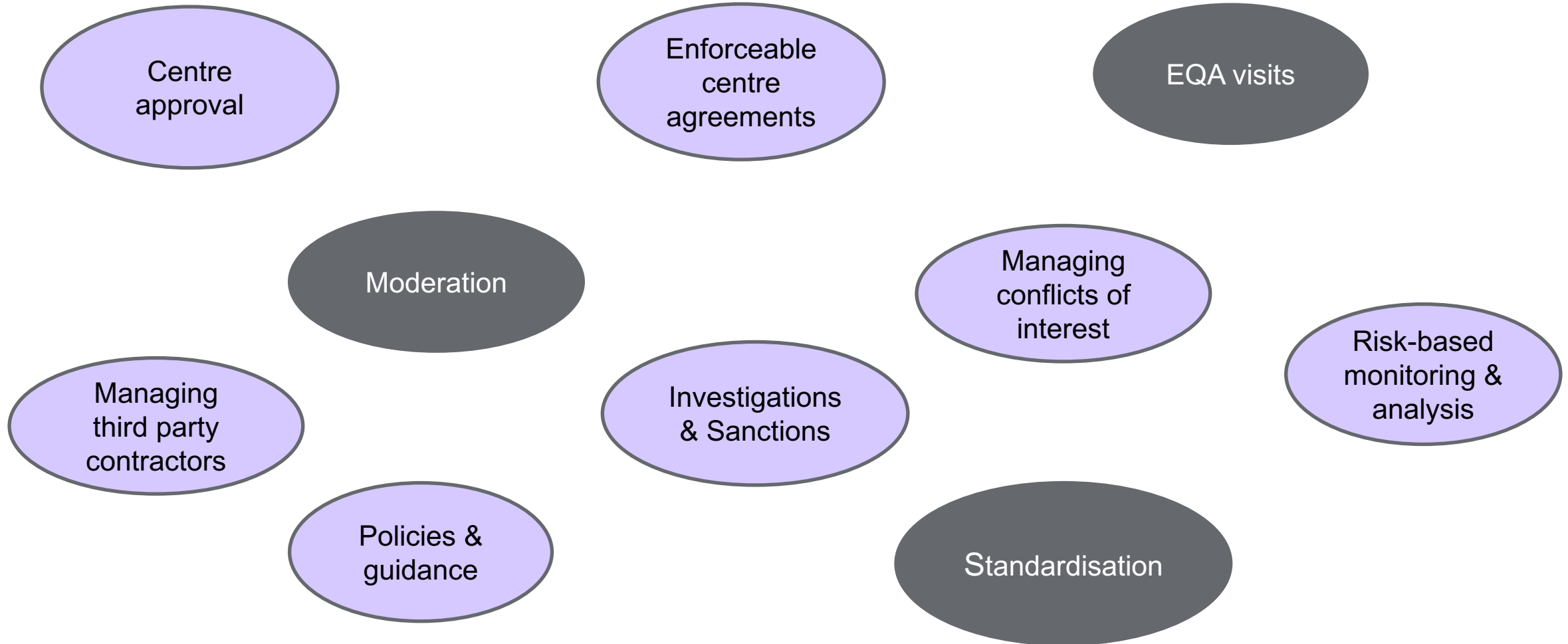
So what?

- Irrespective of the responsibilities you delegate to centres, you retain accountability for your qualifications.
- You must ensure centre controls are robust and effective, and you must manage risks effectively to ensure the qualifications you award are valid and reliable.
- Evidence that some centre controls are not as robust as they need to be.

Moderation

- Subset of the wider centre controls work.
- Practical issues with strict application of our conditions on moderation in VTQs.

Aspects of centre controls



What do the Conditions say?

Condition H2 - Moderation where an assessment is marked by a Centre

H2.1 Where evidence generated by a Learner in an assessment for a qualification made available by an awarding organisation is marked by a Centre, the awarding organisation must have in place clear and effective arrangements to undertake Moderation of the assessment.

H2.2 An awarding organisation must ensure that any such Moderation which it undertakes allows it effectively to determine whether or not –

- (a) the assessment remains fit for purpose, and
- (b) the criteria against which Learners' performance is differentiated are being applied accurately and consistently by Assessors in different Centres, regardless of the identity of the Assessor, Learner, or Centre.

What do the Conditions say?

H2.3 An awarding organisation must –

- (a) ensure that any such Moderation which it undertakes ensures that it is able to make any necessary changes to a Centre's marking of evidence generated by a Learner in an assessment, and
- (b) make such a change wherever it considers it necessary in order to ensure that the assessment remains fit for purpose or that the criteria against which Learners' performance is differentiated are being applied accurately and consistently.

H6.1(d) An awarding organisation must issue results which accurately and completely reflect the marking of assessments (including the outcome of any Moderation and other quality assurance process).

What do the Conditions say?

Condition J1.8 – Definition of Moderation

The process through which the marking of assessments by Centres is monitored to make sure it meets required standards and through which adjustments to results are made, where required, to ensure that results are based on the required standard. This includes verification.

So what?

- Compliance with [strict interpretation of] this Condition presents practical difficulties in VTQs.
 - Issuing results and certificates on the basis of a statement from the centre that a cohort has completed assessments to required standard, before moderating (so certification can occur in between EQA visits/QA activities).
- The outcome we need is that you need to do enough moderation to assure yourself that, at point of issue, results you award mean the same thing wherever and whenever the assessments are taken.
- We want input from AOs, and the wider sector, on how to achieve this objective.

Questions

1. Is the moderation bar too high? Are there specific challenges with achieving compliance with the Condition (H2) on moderation where assessments are marked by centres?
2. Are there circumstances where the costs of moderation outweigh the benefits of securing standards? If so, what are they?
3. Is there a better way to frame the Condition so it achieves this balance?
 - Do we need different requirements for different types of qualification (e.g. licence to practice/on demand)?
 - What would be the consequences of such variation?
 - Are there factors that should trigger moderation (e.g. new assessment materials/new assessors)?

We have an open mind on how to frame the Condition, within the context of our statutory objectives.

Key messages

- Many AOs delegate aspects of qualification delivery and awarding to centres. Not all AOs' centre controls are as robust as they need to be.
- This threatens integrity of assessments, undermines maintenance of standards and damages public confidence in regulated qualifications.
- We want all AOs to look at their centre controls. We will be auditing.
- There is a particular issue around how to manage moderation where marking is delegated to centres in a way that is compliant with our Conditions. We want your input to know whether our rules are right on this point and if not, how they might be changed.
- Overall aim is a clear balance between securing standards and securing efficiency – a clear framework, with which AOs can comply.

Next steps

- Audits on Centre Controls beginning now. We will report on findings.
- Call for Evidence on moderation issue in the Spring.
- Analysis of responses, decision re next steps – Summer.
- If we decide to change the Conditions and/or Guidance on moderation, we will consult formally. We will be clear what we are changing.
- Compliance phase for all AOs to bring themselves into compliance.
- Audit and enforcement phase to follow.