Post-Recognition Monitoring Report

British Institute of Innkeeping Awarding Body

March 2011

Contents

Introduction

Regulating qualifications

The responsibility for regulating qualifications lies jointly with three regulators:

- Office of Qualifications and Examinations Regulation (Ofqual), the regulator for qualifications awarded in England and vocational qualifications awarded in Northern Ireland

- Department for Children, Education, Lifelong Learning and Skills (DCELLS), the regulator for Wales

- Council for the Curriculum, Examinations and Assessment (CCEA), the regulator responsible for qualifications (other than vocational qualifications) awarded in Northern Ireland.

We systematically monitor awarding organisations and their regulated qualifications against the requirements set out in the statutory regulations. The aim of this activity is to promote continuing improvement and public confidence in the quality of regulated qualifications.

Where an awarding organisation is found not to comply with relevant criteria, the regulators will identify areas of non-compliance that must be rectified within a certain period. Even if an awarding organisation is compliant, the monitoring team may provide observations on ways in which the awarding organisation could change its systems and procedures to improve clarity or reduce bureaucracy.

Instances of non-compliance, and observations arising from this monitoring activity, are specified at the end of each section of this report. Awarding organisations are required to produce an action plan to show how they will deal with any non-compliance issues identified. We will generally agree the action plan and monitor its implementation.

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

Banked documents

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

A suite of documents has been identified as suitable for banking, consisting of those items considered to be the most crucial in supporting an awarding organisation's ability to operate effectively. To maintain the currency of the banked documents, awarding organisations are responsible for updating them as and when changes occur. They are also reminded to review them at least annually as part of the self-assessment return.

About this report

This report is the outcome of a monitoring activity on the British Institute for Innkeeping Awarding Body (BIIAB) and was carried out by us in March 2011. It draws together our findings in the areas of:

- management and governance

- resources and expertise

- diversity and equality

- development of units and rules of combination (RoC) for qualifications

- design and development of assessment (unit/qualifications development)

- delivery of assessment

- centre recognition

- awarding and certification.

This is the first post-recognition monitoring activity on the BIIAB since the awarding organisation received recognition for the Qualifications and Credit Framework (QCF) in 2010.

The monitoring activities included desk research of information already held by us, BIIAB's supplementary recognition application and scrutiny of the awarding organisation's website. We visited BIIAB's head office to conduct interviews with staff and review documentation. We also attended a training day.

This report draws together our findings from these monitoring activities.

About BIIAB

BIIAB offers a range of qualifications in the QCF. These qualifications are developed in collaboration with a variety of organisations to award qualifications for defined areas of the licensed retail and security industry. For more information on BIIAB and the qualifications it offers, visit its website at www.biiab.org .

Management and governance

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

Findings

1. BIIAB (the awarding organisation) is a wholly owned, subsidiary company of the British Institute of Innkeeping (BII), the professional body for the licensed retail sector. The awarding organisation is a private company limited by guarantee with no share capital. The awarding organisation completed its recognition as a QCF awarding organisation in 2009.

2. There have been no structural changes to the governance arrangements of BIIAB since the last monitoring activity in 2006. A new Chief Executive, with joint responsibility for both BIIAB and BII, was appointed in 2009. However, we noted that the job description of the Chief Executive does not include any reference to his role as the accountable officer for BIIAB or the requirement to maintain the quality of the organisations' regulated functions.

3. The current governance arrangements are transparent and robust. BIIAB reports to the BII Council via the Chief Executive. Important issues relating to the awarding organisation are escalated to the Council, for example a proposed unit in the security sector had issues with the safety of individuals and these were discussed.

4. Strategic direction for the awarding organisation is provided by the BIIAB Board, a subgroup of the Council, which meets annually. Membership includes three members from the Council, a chair and the treasurer.

5. The day-to-day operation of BIIAB, such as qualifications development, registration and certification, is delegated to the Director of the awarding organisation who reports to the Chief Executive. Senior managers from the awarding organisation report to the Director and they have regular team meetings.

6. BIIAB developed a three-year strategy and business plan, which is agreed by the Council. This plan is shared with awarding organisation staff at an annual event.

7. Quality management is organisation wide across both BII and BIIAB. The Deputy Director of BIIAB takes responsibility for this role, which includes internal audits and the renewal of ISO 9001/2008, and Investors in People accreditation.

8.   We asked how conflicts of interest between the work of BII and BIIAB were identified and managed. From our discussions we are confident that conflicts of interest at Board level are suitably managed. There is a clear distinction between the work of BII and BIIAB although both share systems such as human resources, finance, marketing and IT. The Chief Executive talked about future areas of work that may lead to conflicts of interest and is aware that these will need to be managed.

9.   Awarding organisations are required to publish fee structures. Fees are reviewed annually by the Council and set for 12 months.

Non-compliance

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

Observations

1.   BIIAB should amend the job description of the accountable officer so that it is clear that he or she is responsible for maintaining the quality of the regulated functions.

2.   BIIAB should consider developing a conflict-of-interest policy, detailing how future potential conflicts of interest with the regulated functions will be managed between BIIAB and any other organisation.

Resources and expertise

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 2.4–2.6, 3.1, 4.1, 5.2, 5.5 and 5.6e.

Findings

1. BIIAB has 20 staff at its head office. We noted that there is very low staff turnover, and many staff have had additional training for different roles in the organisation. In addition, external consultants, test writers and assessment inspectors provide specific technical expertise as required.

2. We were satisfied with BIIAB's financial strategy, which supports the current and future demands for its services. BIIAB has a ring-fenced budget. We were told that BIIAB would be able to meet its obligations to learners as there are sufficient finances to enable it to operate for the duration of the life of its units and qualifications.

3. External consultants provide subject expertise and are contracted for this work. Experienced subject experts from nominated centres, or other awarding organisations, produce test questions. Assessment inspectors are also self-employed.

4. There are suitable arrangements for recruitment, which include an application and interview process. Candidates also undertake practical exercises and presentations on a technical aspect of the work to check their understanding of the qualifications area.

5. There is a company-wide, performance management process in place. Objectives are set at the beginning of the company year in November or December and any training needs identified. This is followed by an interim review in May or June.

6. We discussed how BIIAB ensured that its staff and consultants have the necessary knowledge of the QCF. BIIAB confirmed that staff and external consultants have attended the Federation of Awarding Bodies and Ofqual training events. In addition, the awarding organisation provides internal training, and new staff are trained on the technical aspects of the QCF.

7. BIIAB holds regular training events. These include six-monthly, internal events for staff, workshops for centres to update on the qualifications landscape, legislative updates and other matters as relevant. Training days for item writers are compulsory for anyone writing questions for BIIAB.

8.   BIIAB is highly dependent on an IT system for the administration of its qualifications. Units of assessment, RoC, qualifications, learner registrations, generation of questions, test papers, centre management and the production of statistical information are managed by this system.

9.   There is a business continuity plan in place, which clearly shows details of where staff will work and the IT strategy if required. The system was recently tested and we are confident that BIIAB would be up and running quickly if the plan needed to be used. Data is backed up daily and stored off site.

Non-compliance

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

Observations

There are no observations in relation to this section.

Diversity and equality

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 2.11−2.14.

Findings

1. BIIAB confirmed that it uses information from the Federation of Awarding Bodies to update its diversity and equalities policy. In addition, information about the legal content of its qualifications informs the process. We noted that there is no formal review of the policy to ensure that it complies with current legislation and takes account of future changes.

2. We asked what systems were in place to consider equality for all learners and were told that the needs of learners are checked in the development of units, RoC and assessment. For example, the language used is carefully considered in the writing of units and test questions. Any potential barriers are 'designed out' through the piloting of developed qualifications. BIIAB confirmed that reasonable adjustments are available if a barrier is identified that cannot be overcome.

3. We discussed how learners, or their representatives, are consulted during the unit or qualification development phase to ensure that there are no barriers to entry to units and qualifications. BIIAB confirmed that although the qualifications are piloted with learners in centres, there is no formal consultation process.

4. We noted that BIIAB collects learner and test-result data and is in a good position to use this information to monitor its regulatory functions.

Non-compliance

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

Observations

3. BIIAB should implement a procedure to review its diversity and equal opportunities policy against current legislation and make appropriate changes.

Development of units and RoC for qualifications

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 3.2, 4.2–4.3a–f and 6.2a.

Findings

1. The vast majority of BIIAB units, and the RoC for qualifications, are based on the National Occupational Standards, owned by the relevant sector skills council (SSC). BIIAB has contributed to the development of units and RoC but has not yet completed a qualification for the QCF. The Multiple Retail Management qualification is the first qualification developed by BIIAB for the QCF.

2. BIIAB's decision to produce a new qualification is based on one, or all, of the following factors:

    o   strategic change

    o   key industry changes

    o   a regulatory requirement

    o   SSC collaboration.

    A business case is produced and the programme board decides if the development should go ahead. We noted that early dialogue takes place with the SSC. Key departments from BII and industry bodies attend a project initiation meeting for the qualification.

3. We asked who manages the development of qualifications. BIIAB confirmed that the qualifications team leads this development. A steering group with industry experts is convened to draft a specification, which is also discussed with the team industry trainers. The qualifications team interrogates the database for suitable units and RoC, or to identify if any additional units will need to be developed.

4. BIIAB has a procedure to develop units of assessment. The awarding organisation pilots its qualifications before they are finalised. We discussed the pilot phase for units and qualifications as we were concerned that if units or RoC are submitted to the databank before piloting, and changed post pilot, they are technically new units or RoC. BIIAB confirmed that units are submitted to the regulatory IT system (RITS) after the pilot phase.

5. Units are written by the qualifications team with input from individuals with expertise in QCF, assessment and particular subjects as required. A qualification development expert ensures that the unit is in the correct format for acceptance onto the QCF database.

6. BIIAB uses a credit form to record the estimated time in which to meet the learning outcomes and assessment criteria. In addition, the credit is discussed with the steering group and providers. Credit is confirmed after the pilot stage. Appendix E of the QCF arrangements is used to check the level of the unit. Unit writers use generic language and industry experts review the unit.

7. BIIAB explained that they identify equivalent units and exemptions during the qualification development process to maximise credit accumulation and transfer.

8. Before the units and RoC are submitted to RITS, BIIAB pilots its qualifications. The pilot enables BIIAB to consult with learners to identify barriers to assessment, to test that the learning outcomes and assessment criteria are clear and unambiguous, and that credit is set at the right level. Pilot qualifications are evaluated using feedback from centres and BIIAB visits. The documented procedure for piloting qualifications indicates that candidates are certificated but BIIAB confirmed that this is incorrect.

9. BIIAB stated that the steering group recommends sign off to the programme board for the units and qualifications. However, the documented procedures do not accurately reflect the explanations given by BIIAB for the processes it is using. The documented procedure indicates that it is the head of qualifications who reviews and signs off the units not the programme board. We acknowledge that BIIAB has been unable to test fully its documented procedures, but the development of the Multiple Retail Management qualification should assist with this process.

10. Although the Senior Qualification Manager checks review dates for units on RITS, the IT system is not used to record unit-review dates.

11. The procedure for reviewing the RoC is completed as part of the qualification review. External subject experts review units and the RoC to ensure that they are up to date and fit for purpose. Centre tutors, learners and invigilators complete evaluations on new qualifications within the first six weeks of a new qualification starting.

Non-compliance

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

Observations

4.   BIIAB should review its documented procedures for the development and review of units of assessment and RoC so that they accurately reflect current practice.

5.   BIIAB should consider how the pilot phase fits into its procedure for developing qualifications in the QCF.

6.   BIIAB should review its procedure for piloting qualifications so that it is clear that candidates are not certificated for QCF units.

Design and development of assessment

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 5.3 a–g, 5.4 and 5.16a.

Findings

1. We asked how BIIAB designs and develops its assessment methods. The awarding organisation confirmed that 90 per cent of its qualifications have been migrated from the National Qualifications Framework (NQF) and use the same assessment methods. Most of the assessment is independent, either multiple-choice-questions or short-answer questions, depending on the level of the unit/qualification. BIIAB is developing competency-based qualifications that will be internally assessed.

2. Some of BIIAB's qualifications are licence-to-practise qualifications and are based on National Occupational Standards and units developed by SSCs, which dictate the assessment methodology to be used.

3. Short-answer questions, and items for MCQs, are written by external experts with the relevant subject and industry expertise. BIIAB provides its experts with the document, *Guidance for Writing Multiple Choice Items*, which includes examples of well and poorly constructed items, and the requirement to consider plain English and avoid ambiguity. Writers with limited experience attend training sessions with the relevant qualifications manager.

4. Writers are requested to write three questions with answers for each assessment criteria. Items are evaluated by subject experts and moderated by the qualifications team to ensure the learning outcomes and assessment criteria match the specification. We have one concern about this process. The regulatory requirements stipulate that all learning outcomes must be met, and it is unclear how BIIAB can ensure that all the learning outcomes are met and award credit for a unit where its qualifications have set pass marks.

5. Items are entered onto BIIAB's bespoke system and tested. The system initially generates papers to be used during the pilot phase.

6. All qualifications are subject to a pilot phase which is carried out at nominated centres. Feedback from the pilot, relating to its content and assessment, is fed into the qualification development process before the qualification is submitted to RITS. Items are amended or removed as required. This process is good practice.

7. BIIAB also holds moderating meetings to review new units so that they are technically correct. The review includes a number of checks, for example

checking that items and/or questions meet the assessment criteria and are non-discriminatory. Changes to the learning outcomes or assessment criteria are referred to the Qualifications Manager or Steering Group for sign off.

8. BIIAB has a clear, documented procedure for developing assessment, which explains the process from inception to completion. However, it was not possible to test fully the effectiveness of this process as BIIAB has not finalised the qualification, which it is currently developing independently.

9. We noted that the procedure to review the design and development of assessment was not documented.

Non-compliance

1. BIIAB must ensure that where qualifications have set pass marks the methods of assessment used enable all of the learning outcomes of each unit/qualification to be met and justify the award of credit attached to that unit.

(*Regulatory Arrangements for the Qualifications and Credit Framework*, August 2008, paragraphs 5.3d and 5.12b.)

Observations

7. BIIAB should document the procedure to review the design, development and review of its assessment methods.

Delivery of assessment

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 5.5–5.6, 5.9, 5.10, 5.16b and 5.20–23.

Findings

1. BIIAB has clearly defined roles for staff and external contractors involved in the assessment of its qualifications. Centres are provided with specifications, which detail the learning outcomes and assessment criteria, and the competency requirements for centre staff, such as nominated tutors. Information on these requirements is available in the secure section of BIIAB's website.

2. Item writers and markers are required to declare conflicts of interest. We asked BIIAB what arrangements were in place to ensure that staff involved in future competency assessments did not have a personal interest in the centre. BIIAB confirmed that it will have to put these arrangements in place when the competency qualifications are available.

3. Currently, centres do not devise assessment tasks. All assessment is devised and marked by BIIAB. However, BIIAB will need to consider what procedures it will put in place if it devolves the responsibility for devising assessment tasks to centres.

4. Centres are issued with the *Centre Manual for the Administration of BIIAB Qualifications*. This manual includes, for example, detailed information on the security of examination materials and invigilation requirements.

5. Examination materials are available four weeks prior to the examination. Materials are available to download ten working days before the examination date and expire at the stipulated examination time.

6. BIIAB has systems in place to ensure that exam papers are changed every six weeks and centres do not have the same paper twice. For larger centres in different assessment locations, BIIAB ensures that different papers are issued to centres or venues on the same day.

7. BIIAB has suitable arrangements for ensuring the authenticity of evidence. For example, the awarding organisation provides centres with a list of acceptable forms of identification, and for some examinations learners have to produce photographic identification prior to examinations.

8. We discussed with BIIAB the procedures used to standardise assessment. Most of the standardisation for multiple-choice-questions is front-loaded although

there is an annual review of the items in the banks, which includes statistical analysis of the performance of questions.

9. We also looked at the processes for marking multiple-choice-question examinations. BIIAB uses specific software, which enables multiple-choice-question papers to be scanned and uploaded for marking. There are automatic checks in the system, which map the multiple-choice-question examination to the correct answer paper. The system also maps the answers against the assessment criteria so that learners have an indication of any areas of weaknesses.

10. BIIAB monitors its markers through the annual standardisation exercise where they mark sample scripts. Any marking outside of the tolerance level is reviewed and discussed. We also noted that scripts are double marked to ensure accuracy and consistency. Borderline scripts are also reviewed. In addition, the examinations department can identify any discrepancies where markers are not within the tolerance level for questions.

11. BIIAB retains all scripts for one year, and details of the multiple-choice-questions are held on the database indefinitely.

12. BIIAB has a policy on the recognition of prior learning and has suitable procedures to check exemptions claimed by learners. For example, BIIAB will verify the achievement of a unit with the relevant awarding organisation and request a copy of the certificate.

Non-compliance

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

Observations

8. BIIAB should review its arrangements for declaring conflicts of interest for the conduct of assessment, and quality assurance of assessment decisions, so that all methods of assessment are covered.

Centre recognition

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 5.11, 5.16b and 5.18.

Findings

1. BIIAB has clearly defined procedures for recognising and monitoring centres. It employs two monitors, who are responsible for centre recognition visits and the on-going monitoring of centres to confirm their continued compliance with BIIAB's requirements. Centres failing to comply may be subject to an action plan or have their recognition withdrawn. The awarding organisation uses a grading system for centres. Centres graded 1–2 self-evaluate their systems and are not visited annually, whereas centres graded 3–5 receive annual visits.

2. All centres receive a copy of the quality assurance manual, which includes information on BIIAB's administrative requirements for centres, such as invigilation requirements.

3. The centre-recognition process is based on a site visit and completed application form. Monitors check that centres have adequate management systems, staffing and resources to meet BIIAB's centre-approval criteria and requirements for nominated tutors. Monitors also check that systems are in place to obtain the unique learner number and access learners' achievements.

4. Centres are required to identify a single, named point of accountability responsible for the quality assurance and management of BIIAB units and qualifications. This person is required to undertake that they will comply with all BIIAB's documented rules, procedures and processes. However, the statement on the centre application form does not explicitly stipulate that a centre must allow BIIAB and the regulators access to their premises. We noted there was some reference to this requirement in the quality assurance manual.

5. BIIAB currently uses a specialist system to record centre information. Data includes, for example, the single, named point of accountability and details of nominated tutors and of learners. BIIAB has suitable arrangements to track learners' progress through its database, which records units by learner. Information held on this system is retained indefinitely.

6. BIIAB has a secure, password-protected area for centres on its website, which allows access to all documentation, forms and data relating to learners, results and achievements, and question and answer papers which can be downloaded or ordered.

7. Currently, BIIAB only offers independent assessment. The awarding organisation is developing competency-based qualifications, which will use a variety of assessment methods, such as observation and portfolio work, and place more responsibility on centres. Internal assessment results will need to be quality assured and transmitted securely to BIIAB, and the awarding organisation will need to consider what procedures it will implement to cover fully the requirements of paragraph 5.11.

Non-compliance

2. BIIAB must ensure that its centres agree to provide BIIAB and the regulators with access to people, premises and records.

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

Observations

9. BIIAB should document the review process that ensures its procedures for the delivery of assessment and centre recognition meet the regulatory requirements.

Awarding and certification

Subject to the *Regulatory Arrangements for the Qualifications and Credit Framework* (August 2008), paragraphs 5.12–5.15, 5.16 c–d and 5.19.

Findings

1. The QCF arrangements require awarding organisations to have systems in place to determine when learners have achieved a credit, or completed the RoC for a qualification, so that certificates can be issued.

2. Scripts and multiple-choice-question answers are returned to BIIAB where the papers are date stamped, checked against the original centre order form and placed into colour-coded wallets for ease of tracking. Short-answer questions are sent to two separate markers, and the results are issued to centres within 10 days of receiving the marked scripts.

3. Multiple-choice-question papers are scanned, electronically marked and the results issued to centres within one day of receipt. Answer grids are scanned into the system, using an optical reader, manually checked on screen to ensure that the data has been accurately scanned and any identified errors amended. The system is very sensitive and is able to identify multiple 'rubbings out' on an answer sheet.

4. The database also identifies when the RoC for a qualification is completed and when a learner achieves a unit(s), it automatically highlights other qualifications the unit is included in to confirm whether the learner is entitled to additional credit or qualification certificates. We saw the database in operation and are satisfied with the checks made. All answer sheets are stored in system against the learner's record.

5. While the system is able accurately to identify the point where a learner has achieved enough to be able to be awarded credits or a qualification, we are not confident that learners passing examinations with the minimum pass mark will have met all the required learning outcomes.

6. We asked what arrangements were in place to review and adjust results, in either units or qualifications, if there was, for example, an issue with a question. BIIAB stated that any error would become apparent during the marking process. It would be identified if a number of learners within a cohort of learners answered the same question incorrectly or if it was the way the section was taught or there was a specific problem with the question.

7. If there is an issue or error with a specific question, the question is deactivated in the system and reviewed by the Qualification Manager. In this instance it is

BIIAB policy to award a mark to learners who answered the question incorrectly. While this approach alters the results for learners disadvantaged by the question, it is unfair to learners who answered the question correctly. If an item is deactivated, the bespoke system identifies which MCQ papers contained the item and the learners assigned this paper. Any learner identified as being disadvantaged by the item who had failed the paper would be awarded the mark. However, there are no documented procedures explaining how results are reviewed and adjusted.

8. BIIAB's certificate design meets the design requirements of the regulatory arrangements. However, the unit title printed on the certificate must exactly match the unit title on the register and needs to show clearly that the learner has been awarded credit.

9. BIIAB has suitable procedures for issuing replacement certificates, which include checking the date of birth and identity of learners. All applications have to be made in writing.

10. BIIAB security qualifications are recognised as licence-to-practise qualifications in Scotland. We noted that BIIAB had not informed its clients that the regulators' logos on the certificate indicate the qualification is accredited only for England, Wales and Northern Ireland.

Non-compliance

3. BIIAB must have documented procedures explaining how results are reviewed and adjusted if errors are identified.

(*Regulatory Arrangements for the Qualifications and Credit Framework*, August 2008, paragraphs 5.12c and 5.14c.)

4. BIIAB must inform its clients that the regulators' logos on the certificate indicate the qualification is accredited only for England, Wales and Northern Ireland.

(*Regulatory Arrangements for the Qualifications and Credit Framework*, August 2008, paragraph 5.19b.)

Observations

10. BIIAB should review the design of its credit certificate so that the certificate clearly shows that the learner has been awarded credit.

We wish to make our publications widely accessible. Please contact us if you have any specific accessibility requirements.

First published by the Office of Qualifications and Examinations Regulation in 2011

Any enquiries regarding this document/publication should be sent to us at:

Office of Qualifications and Examinations Regulation
Spring Place   2nd Floor
Coventry Business Park   Glendinning House
Herald Avenue   6 Murray Street
Coventry CV5 6UB   Belfast BT1 6DN

Telephone 0300 303 3344
Textphone 0300 303 3345
Helpline   0300 303 3346