

Centre Monitoring and Quality Assurance: A risk- based approach

1. Introduction

1.1 The purpose of this document is to explain the risk-based approach taken by Open College Network West Midlands in monitoring Recognised Centres and providing the external quality assurance for their provision. This approach is intended to underpin consistency in the judgements of Open College Network West Midlands Quality Advisers (QAs) and External Verifiers (EVs) and to provide greater transparency for Centres in understanding how those judgements are reached.

2. The purpose of the risk-based approach to quality assurance

2.1 The key purpose of the risk-based approach to quality assurance is to support continuous quality improvement for both Open College Network West Midlands and its Recognised Centres. It provides a diagnostic tool that allows Centres and Open College Network West Midlands to identify:

- The overall effectiveness of Centre arrangements in relation to Centre recognition criteria and the delivery of Open College Network West Midlands courses and qualifications;
- the relative 'rating' of specific Open College Network West Midlands courses and qualifications within that provision
- strengths and weaknesses in specific aspects of Centres' arrangements and provision as a means of identifying quality improvement priorities;
- whether the interventions of Open College Network West Midlands QAs and EVs have supported Centres in continually improving arrangements for the delivery and quality assurance of Open College Network West Midlands provision.

In addition it is used by Open College Network West Midlands to inform decisions about the application of sanctions and the eligibility of Centre for Direct Claims Status (see sections 4 and 5 below).

3. The Model

3.1 In monitoring Recognised Centres and externally verifying their provision, Open College Network West Midlands QAs and EVs will make judgements about the potential risk posed to the integrity of the award of credit or the Centre's ability to comply with Open College Network West Midlands Centre recognition requirements. Those judgments will be informed by the number and significance of the issues identified during Centre visits and the urgency of the remedial action that is required to address them.

3.2 These judgments are made in relation to the specified 'Risk Areas' indicated below:

- Centre Compliance
- Internal Assessment
- External Assessment
- Internal Quality Assurance
- Direct Claims Status

Judgements are made after each Centre monitoring visit and are now recorded in the relevant section of the *Centre Monitoring Report*.

3.3 Depending on the focus of each Centre monitoring visit one or more of these Risk Areas will be Risk-Rated. Open College Network West Midlands employs a modified traffic-light system based on the following risk bands to express these ratings:

- Low Risk
- Marginal Risk
- Moderate Risk
- High Risk

Guidance on the general circumstances that would lead a specific Risk Rating to apply to a specific Risk Area, together with indicative examples, is included in Appendix 1 of this document.

3.4 The Risk Ratings applied to the Risk Areas identified above are also used to inform a judgement about the overall risk rating of the Centre, as illustrated in Appendix 1. This is again recorded in the Centre Monitoring Report. The Risk Rating for the Centre as a whole is based on the recommendation of the QA/EV concerned, which is subsequently reviewed and confirmed by the Open College Network West Midlands Head of Access and Quality. This overall Risk Rating is based on a professional judgement which takes account of the specific circumstances that may apply in a particular Centre at a particular time. Consequently, it may not automatically or directly reflect any particular combination of ratings in the individual 'Risk Areas'.

4. Risk Rating, Conditions and Sanctions

4.1 Where a QA/EV monitoring visit identifies areas for improvement the action(s) required of the Centre will be recorded in the Centre Monitoring Report. These actions take the form of:

- **Recommendations** (i.e. amendments to current practice intended to further improve compliant arrangements)
- **Conditions** (i.e. actions required to address areas of non-compliance).

4.2 Whilst the QA/EV will make every effort to agree Conditions and associated actions with the Centre Open College Network West Midlands reserves the right to impose Conditions and/or Sanctions, as appropriate. Centres are referred to the Appeals Policy where they regard the application of Conditions or Sanctions as unreasonable.

4.3 The actions and sanctions that Open College Network West Midlands will apply to Centres will normally fall within a range determined by the risk-rating applied to each Risk Area, as illustrated in the following table:

Risk Band	Actions / Sanctions
Low Risk	<ul style="list-style-type: none"> Recommendations to improve already compliant practice in the light of best practice may apply
Marginal Risk	<ul style="list-style-type: none"> Conditions requiring the Centre to address more significant, but isolated, non-compliance issues by an agreed deadline may be set
Moderate Risk	<ul style="list-style-type: none"> Conditions requiring the Centre to address more widespread or significant areas of non-compliance may be set and drawn to the attention of the Centre's senior management team Additional development visits by the Open College Network West Midlands QA may be required (additional fee payable) Suspension of registration and / or certification for specified courses / qualifications
High Risk	<ul style="list-style-type: none"> Suspension of registration and / or certification for all courses / qualifications Withdrawal of Centre approval for specific courses / qualifications Withdrawal of Centre approval for all courses / qualifications

Where sanctions involving the suspension and / or withdrawal of registration or certification apply the recommendation of the QA must be endorsed by the Head of Quality and Access. Please refer to the Open College Network West Midlands Sanctions Policy for further information.

5. Risk Rating and Direct Claims Status

5.1 A comprehensive account of the Open College Network West Midlands's Direct Claims Status requirement can be found in the Centre Handbook. However, for Centres to be considered for Direct Claims Status a key requirement is that their arrangements for the delivery, assessment and internal quality assurance of their Open College Network West Midlands provision have been consistently effective and robust.

5.2 In practice this means that Centres must have achieved a Low or Marginal risk rating in each Risk Area and in the overall Centre Rating for at least 12 months.

Appendix 1

Risk Rating Indicators

Risk Areas	Risk Bands	Risk Indicators	Indicative Examples
Centre Compliance	Low Risk	The Centre is compliant with all Centre Recognition requirements, although recommendations may be made in relation to best practice.	Not Applicable
	Marginal Risk	The Centre is largely compliant with all Centre Recognition requirements. A limited number of shortcomings exist and some actions are required. These do not impact on the integrity of the award of credit and can be readily addressed by the Centre within a short timescale.	<p>Centre does not notify Open College Network West Midlands of changes to key contacts.</p> <p>A new Centre administrator is unfamiliar with the Open College Network West Midlands' registration and awards processes, but has reserved a place on the relevant training course</p> <p>A Centre's Malpractice Policy needs a minor revision to be consistent with Open College Network West Midlands and/or Ofqual requirements, but is under review.</p> <p>The Centre's website gives the misleading impression that its Customised provision leads to a QCF qualification, but is being revised</p>
	Moderate Risk	There are marked areas of non-compliance or the areas of non-compliance identified, though limited, have the potential to compromise the award of credit. Significant and / or urgent action is required by the Centre.	<p>The Centre's Appeals Against Assessment Policy has no recourse to the awarding organisation, leading a cohort of learners to be disadvantaged.</p> <p>Tutors are not experienced in credit-based learning.</p> <p>New staff have not been sufficiently inducted into Open College Network West Midlands procedures resulting in unintentional maladministration.</p>

	High Risk	<p>There are significant areas of non-compliance, including those which have a direct and immediate impact on the security of the award of credit. Immediate remedial action is required by the Centre and/or Open College Network West Midlands to protect the interests of learners or preserve the integrity of the award of credit.</p>	<p>The Centre continues to deliver a qualification after the only assessor with the qualification specified in the qualification guide has left and has not been replaced.</p> <p>Centre systems for the tracking and recording of learner achievement are inadequate – the Centre is unable to provide learner records, as requested by the QA or EV.</p> <p>The Centre falsifies records in order to claim achievement by its learners.</p> <p>Key Centre policies do not exist or are not applied in practice.</p> <p>The Centre lacks equipment essential to the achievement of units it has delivered.</p>
Internal Assessment	Low Risk	<p>Assessors use valid, reliable and inclusive forms of assessment. Assessment guidance is clear and comprehensive, ensuring that the evidence of achievement presented clearly relates to the unit(s) being assessed. Assessment decisions are consistently accurate and clear and constructive feedback is provided to learners.</p>	Not Applicable
	Marginal Risk	<p>Assessment practice largely conforms to the features outlined above. Shortcomings are identified but are restricted to specific aspects of tutor / assessor practice and / or the divergent practice of individual assessors. Action is required by the Centre, but the award of credit is secure.</p>	<p>The assessment judgments of one of a team of tutors is inconsistent, although the inconsistency was identified and addressed within the Internal Quality Assurance process</p> <p>There are minor inconsistencies in the interpretation by assessors of the type of evidence required to meet a criterion for a single unit.</p> <p>A small proportion of evidence for some learners is unavailable when the QA/EV visits, although a convincing explanation is provided by the Centre.</p>

		<p>Poor portfolio construction makes it difficult for the QA/EV to track learner achievement and confirm the tutor's recommendation (e.g. no cross referencing of evidence to assessment criteria, teaching material not separated from learner evidence)</p> <p>Assessment practice and record keeping are appropriate, but there is limited feedback to learners</p>
	Moderate Risk	<p>There are marked shortcomings in relation to the practice outlined above either by individual assessors or across the tutor / assessor team as a whole. These are sufficient to pose a potential risk to the security of the award of credit and urgent action is required of the Centre.</p> <p>An assessment activity is not valid – it does not evidence all of the assessment criteria indicated as achieved on the unit tracking sheet.</p> <p>A number of assessment judgments by one or more tutors are overturned by the IQA and/or QA/EV</p> <p>There is wide variation in the volume of evidence required by tutors delivering the same course or qualification within the Centre</p>
	High Risk	<p>There are significant shortcomings in the Centre's assessment practice, such that Open College Network West Midlands can have little confidence in the recommendations for the award of credit made in relation to some or all of its provision. Immediate remedial action is required by the Centre and/or Open College Network West Midlands to protect the interests of learners and / or preserve the integrity of the award of credit.</p> <p>There are systematic errors in the recommendations for the award of credit made by the Centre</p> <p>The Centre 'excuses' a learner with a disability from the requirement to achieve an assessment criteria they are physically unable to achieve, rather than refer to the Open College Network West Midlands' Reasonable Adjustment Policy.</p> <p>A unit which can only be assessed through a practical activity is assessed through a written assignment, so the QA cannot confirm the award of credit.</p> <p>There is evidence of systematic collusion between students in completing an assignment</p>

External Assessment	Low Risk	The Centre complies with all the requirements that apply to all external assessments it delivers including security arrangements, the conduct of assessment, and invigilation requirements.	Not Applicable
	Marginal Risk	The Centre is largely compliant with the requirements that apply to the external assessments it delivers. Some action is required to address areas of non-compliance, but the conduct of the assessment is secure.	The required notices are not on display in the room where the assessment is to take place.
	Moderate Risk	There are marked shortcomings in the arrangements for external assessment. These are sufficient to pose a potential risk to the security of the award of credit and urgent action is required of the Centre.	The venue for an external assessment was inappropriate with insufficient space between learners to ensure that the work they produced was their own.
	High Risk	There are significant shortcomings in the conduct of external assessment, such that Open College Network West Midlands can have little confidence in the validity and/or authenticity of the evidence of achievement produced. Immediate remedial action is required by the Centre and/or Open College Network West Midlands to protect the interests of learners and/or preserve the integrity of the award of credit.	<p>Learners were not provided with an external assignment sufficiently in advance of the assessment date, as required, and were disadvantaged compared with those taking the same assessment in other Centres.</p> <p>Invigilation was conducted by member of staff who allowed additional time and left learners unsupervised for part of the assessment.</p> <p>Open College Network West Midlands is advised that Centre Staff gave inappropriate guidance to learners during the assessment.</p> <p>The Centre's arrangement for the safeguarding of external assessments are inadequate</p>

Internal Quality Assurance	Low Risk	Robust internal verification activity is evident, confirming the appropriateness of assessment tasks, the validity and consistency of assessment decisions, appropriate standardisation procedures and accurate record keeping.	Not Applicable
	Marginal Risk	Internal quality assurance activity is largely robust. Shortcomings are identified but are restricted to specific aspects of the internal quality assurance arrangements and /or practice. Action is required by the Centre, but the award of credit is secure.	The Centre's written IQA plan has not been updated following the appointment of a new assessor. IQA arrangements are robust but IQA records have not been updated since the last IQA activity.
	Moderate Risk	There are marked shortcomings in aspects of the Centre's IQA arrangements and / or practice such that there is a potential risk to the security of the award of credit unless urgent action is taken by the Centre.	The Centre's IQA process has no mechanism for checking that actions resulting from IQA activity are addressed by assessors. External quality assurance identifies that the IQA process are not addressing identified shortcomings in important aspects of assessment practice, such as feedback to learners and evidence of learner work being assessed. IQA is carried out but no formal IQA reports completed. IQA reports are inadequate, with no feedback to assessors or Actions recorded.
	High Risk	There are significant shortcomings in the Centre's IQA arrangements and / or practice such that the security of the award of credit has been compromised. Immediate remedial action is required by the Centre and/or Open College Network Wes Midlands to protect the interests of learners and/or preserve the integrity of the award of credit.	A Centre with multiple sites delivering the same qualification with different IQAs in place has no provision for standardisation and external quality assurance exposes serious inconsistencies in the decisions of assessors. No IQA processes exist or processes existing on paper are not being applied in practice

Direct Claims	Low Risk	The practice of approved internal verifiers is robust, with appropriate sampling of the evidence of achievement, appropriate reference to IQA records, valid judgements in relation to learner achievement, and insightful feedback to tutors and internal quality assurance staff.	Not Applicable
	Marginal Risk	The practice of approved IQAs largely conforms to the features outlined above. Shortcomings are identified but are restricted to specific aspects of practice and/or the divergent practice of individual approved IQAs. Action is required by the Centre, but the award of credit is secure.	<p>A Centre has a robust IQA process, and systematic IQA records, although feedback to assessors is brief and sometimes absent.</p> <p>Centre monitoring identifies a weak link in the Centres IQA process which the Centre is already aware of and is addressing.</p>
	Moderate Risk	There are marked shortcomings in relation to the practice outlined above either by individual approved IQAs or across the approved IQA team as a whole. These are sufficient to pose a potential risk to the security of the award of credit and urgent action is required of the Centre.	<p>A Centre with multiple approved IQAs in place has no provision for ensuring they are consistent in their approach or judgments.</p> <p>Some approved IQAs are not completing IQA reports or quality issues identified in reports have not been addressed.</p>
	High Risk	There are significant shortcomings in the practice of approved internal verifiers, such that the Open College Network West Midlands can have little confidence in the recommendations for the award of credit made in relation to the provision they are responsible for. Immediate remedial action is required by the Centre and/or Open College Network West Midlands to protect the interests of learners and/or preserve the integrity of the award of credit.	<p>An approved IQA is unable to produce records of internal quality assurance for a group of assessors but has confirmed the award of credit.</p> <p>The CQA discovers at direct claims check that learners have not achieved assessment criteria of previously claimed credits.</p>

Centre Risk Rating Indicators

Risk Band	Risk Indicator
Low Risk	There is little or no risk to the integrity of qualifications, Centre approval criteria, regulatory conditions and/or the reputation of Open College Network West Midlands. The Centre's performance is good.
Marginal Risk	Any risk to the integrity of qualifications, Centre approval criteria, regulatory conditions and/or the reputation of Open College Network West Midlands is marginal and Centre performance is satisfactory
Moderate Risk	There are concerns about a specific risk indicator or indicators and customised action is required to ensure the integrity of qualifications, Centre Recognition criteria, regulatory conditions and/or the reputation of Open College Network West Midlands. Sanctions may be imposed.
High Risk	On the basis of the available evidence there are major concerns about one or more risk indicators which threaten the integrity of qualifications, Centre recognition criteria, regulatory conditions and/or the reputation of Open College Network West Midlands. Urgent action is required. Sanctions may be imposed.