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PART OF **nocn** GROUP

# **Risk-Based Approach to Centre Quality Monitoring Policy and Procedure**

Version 5.2

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## 1. Scope

1.01 This policy and procedure outlines NOCN's risk-based approach to the quality monitoring of its approved centres<sup>1</sup>. It extends to all areas where NOCN, or Delivery Partner, has granted approval for a Centre to deliver:

- a) Regulated qualifications under the various conditions and regulations set by the UK regulatory authorities in England, Northern Ireland and Wales<sup>2</sup>.
- b) Non-regulated provision, including Endorsed Programmes.

1.02 If a Centre is managed by a NOCN subsidiary or Delivery Partner, then the organisation will follow this policy and procedure on behalf of NOCN. Centres and learners who are affected by this should replace references to NOCN with the relevant subsidiary or Delivery Partner throughout this document.

1.03 The intended audience for this document is:

- a) NOCN Directors and Board of Trustees.
- b) NOCN core, sub-contracted and associate staff, including External Quality Assurers (EQAs).
- c) All staff of NOCN Delivery Partners associated with NOCN provision.
- d) All staff in NOCN recognised and partner centres.
- e) Qualification Regulators.
- f) Industry Regulators.

## 2. Purpose

2.01 The purpose of this document is to:

- a) Ensure that the standard of delivery of NOCN qualifications consistently meets regulatory requirements.
- b) Outline how NOCN will monitor the delivery of NOCN products within its approved centres.
- c) Minimise any risks to the integrity of NOCN products.
- d) Outline to centres what action NOCN will take where it identifies that the management, delivery or quality assurance standards of a Centre do not meet NOCN or regulatory requirements. This includes the use of a Sanctions tariff.
- e) Outline to centres NOCN's Centre Assessment Standards Scrutiny strategy for Centre-marked assessments.

## 3. Policy

3.01 As part of its regulatory responsibilities, NOCN must take all reasonable steps to monitor the training, assessment and internal quality assurance practices of its centres, to ensure that each certificate issued is based on the required evidence of learner achievement. This policy and procedure outlines NOCN's approach to the quality monitoring of its centres, as part of NOCN's overall Centre Assessment Standards Scrutiny strategy.

3.02 Before being able to deliver NOCN products, centres must first go through Centre approval, as outlined in the NOCN Centre Approval Policy and Procedure. The Centre approval process will seek to ensure that centres have the required systems, expertise, resources, policies and

<sup>1</sup> This includes Centres of NOCN's **recognised** Delivery Partners.

<sup>2</sup> Ofqual in England; Qualification Wales; CCEA Regulation in Northern Ireland or successor bodies.

procedures to fulfil their responsibilities effectively and consistently regarding the management, administration, training, assessment and internal quality assurance of its NOCN provision.

- 3.03 Once approved by NOCN, each Centre will be monitored by NOCN regarding its continued compliance with all NOCN requirements. NOCN is committed to having a transparent, fair, robust and risk-based approach to the quality assurance monitoring of its approved centres.
- 3.04 To retain their Centre approval, centres must consistently meet the NOCN approval criteria, as outlined in the NOCN Quality Assurance Manual. Centres must also comply with the NOCN Centre Agreement and Terms and Conditions. By signing the NOCN Centre Agreement and Terms and Conditions, centres agree to comply with all NOCN requirements, including the responsibilities required under this policy.
- 3.05 Although the approval criteria have been designed so that they are applicable across all NOCN products, when reviewing Centre compliance, the Quality Assurance Team and the Centre's EQA will apply them so that they are specific to the products and assessments within each individual Centre's provision.
- 3.06 The approval criteria cover all aspects of administering and delivering NOCN products and is grouped into five 'risk areas':
- a) Internal Management and Systems.
  - b) Delivery Staff, Resources and Equipment.
  - c) Assessment and Training.
  - d) Internal Quality Assurance.
  - e) External Assessment Arrangements (where this is applicable to the Centre's provision).
- 3.07 The NOCN Quality Assurance Manual provides further information, support and guidance for centres on their responsibilities assumed by their Centre approval and their role in the delivery of NOCN products.
- 3.08 Where centres only deliver non-regulated provision, they will be monitored against a tailored list of approval criteria that will not encompass some Regulatory requirements but will still aim to ensure a robust delivery model is in place. The Quality Assurance Team can confirm which requirements are relevant to a Centre's provision.
- 3.09 The ongoing quality monitoring of centres is managed by the Quality Assurance Team, in conjunction with the Centre's assigned EQA. The Quality Assurance Team will work closely with EQAs to review the Centre's level of compliance through:
- a) External quality assurance monitoring activities.
  - b) Responding to information received from the Regulators and/or other external bodies, including regarding malpractice and maladministration.
  - c) Responding to external feedback and/or complaints received from learners, Centre staff, whistle-blowers, other Awarding Organisations, members of the public or the media.
  - d) Investigation into suspected or proven malpractice as defined in the NOCN Malpractice and Maladministration Policy and Procedure.
  - e) Monitoring of the management of administration associated with NOCN provision.
- 3.10 All approved centres will be subject to a level of routine quality monitoring each academic year. Additional monitoring (i.e., activity which takes place above the levels of routine monitoring), can be requested by a Centre, or may be triggered by the Quality Assurance Team. Additional

monitoring will be chargeable to the Centre, in line with the NOCN Fees and Charges, unless specified by NOCN.

## I. Routine Monitoring

- 3.11 Each Centre will receive at least one external quality assurance monitoring activity per academic year. This activity will be either face to face or remote dependent on the nature of the Centre's delivery model and the risk and content of the NOCN products within their provision. Where the Centre's throughput allows it, centres are also entitled to a second external quality assurance monitoring activity, which will be either:
- A Centre-based external quality assurance visit.
  - A remote external quality assurance visit.
  - Remote portfolio sampling.
- 3.12 NOCN may conduct both announced and unannounced monitoring activities of centres at any time. Centres are required to allow access to their premises, records, learners and staff for the purposes of monitoring without notice when requested to do so by NOCN. NOCN understands that there may be certain situations where this is not possible, however centres must ensure that they fully co-operate with NOCN at all times.

## II. Additional Monitoring

- 3.13 NOCN reserves the right to undertake additional monitoring of a Centre at any time. This may be due to, but is not limited to:
- The size and structure of the Centre.
  - The subject sector areas under focus by NOCN.
  - Whether the Centre has DCS.
  - High volume of registrations and/or certifications.
  - Non-payment or late payment of invoices.
  - Information provided by internal stakeholders.
  - Intelligence received externally by NOCN.
- 3.14 In addition to the above, centres who deliver qualifications in high risk sectors such as construction, may receive additional EQA monitoring from NOCN to focus on the review of the Centre's management and internal quality assurance systems. This may include additional visits, some of which may be unannounced, as well as information and evidence gathering exercises by third party organisations who may act on behalf of NOCN. Centres will not be charged for additional monitoring in these circumstances. A list of qualifications which NOCN deem as high risk can be obtained from the Quality Assurance Team.
- 3.15 During the period between EQA monitoring activities, centres may still submit certification claims to NOCN even if they do not hold DCS for the units/qualifications that they submit claims for. It is important to note that submission of certification claims does not automatically trigger EQA activity and that if this has not already been planned, centres must contact the Quality Assurance Team, or their EQA directly, for EQA activity to be organised.
- 3.16 To enable approval of certification claims to take place by an EQA, the Centre may:
- Request an additional monitoring visit, either face to face or remotely (charges apply).
  - Request a remote sample of Centre-assessed work (charges apply).
  - Request a Direct Claims Status approval visit, either face to face or remotely (charges apply)

d) Wait until their next monitoring visit for EQA review.

3.17 Centres may request additional EQA monitoring, support visits or remote sampling from NOCN at any time. Centres should request additional monitoring from the Quality Assurance Team, who will co-ordinate the process. Requested additional monitoring is chargeable to the Centre, as detailed in the NOCN Fees and Charges document.

### III. Application of Risk Rating

3.18 The EQA will use their findings from each monitoring activity to make judgements about the Centre's level of risk in the five approval criteria 'risk areas' as outlined in 3.06).

3.19 Based on the available evidence, the EQA will assign the Centre a risk rating of either low, moderate or high in each of the 'risk areas'. The risk rating applied will be based on the EQA's judgement of how successful the Centre is in meeting the approval criteria in that area. Centres who successfully demonstrate their ability to consistently meet the criteria will be assigned a low risk rating. Conversely, where centres do not meet the approval criteria, or where action is required to meet criteria, centres will be assigned either a moderate or high risk rating, dependent on how severe the non-compliance is deemed to be by the EQA.

3.20 The failure to address previously identified actions by the EQA to meet or strengthen compliance with the approval criteria may result in an escalation of the risk level assigned and an increase in the level of future monitoring the Centre will receive.

3.21 The highest level of risk assigned across the 'risk areas' will determine the overall risk rating assigned to the Centre. NOCN's approach to the monitoring of a Centre is driven by this overall risk rating. The level of risk that is applied to the Centre following a monitoring activity will determine in what timescale the Centre's next **routine monitoring** activity will take place.

3.22 Where immediate risk to the integrity of NOCN qualifications or to the interests of learners is identified, the EQA may recommend a Sanction against a Centre. Any Sanctions recommended will be proportionate to the risk identified and range from levels 1 to 5, increasing in severity. Dependent on their level, the application of a Sanction may affect the Centre's registration, certification or Direct Claims Status<sup>3</sup> (DCS) rights. The application of a Sanction may also trigger **additional monitoring** for corrective action by the Centre to be reviewed by the EQA, which may be chargeable. NOCN's full list of Sanctions are detailed in point 4.28.

3.23 The scale of NOCN risk ratings, with their corresponding indicative Sanction level and timeframe of next monitoring activity, is detailed below:

<sup>3</sup> **Definition:** Direct Claims Status (DCS) is a method of obtaining learner certification without the requirement of a NOCN EQA scrutinising the Centre's assessment decisions and practices in relation to a learner's evidence of achievement. Instead, this scrutiny will take place following certification on a risk basis, in line with this policy and procedure. DCS is approved by NOCN on an individual product basis.

Risk Rating	Risk Descriptor	Indicative Sanction Level	Indicative Timeframe of Next Monitoring Activity
Low	Centre successfully meets approval criteria and regulatory requirements, or any remedial actions required to meet requirements are minor. The Centre does not pose a risk to NOCN products or to learners.	None to Level 1	Within 12 months
Moderate	Centre does not meet all approval criteria and/or regulatory requirements and there are concerns with regards to the risk to learners and/or the integrity of NOCN products. Significant action is required.	Level 2	Within 6 months
High	Centre does not meet approval criteria and/or regulatory requirements and there are major concerns with regards to the risk to learners and/or the integrity of NOCN products. Urgent and significant action is required.	Level 3 and Above	Within 3 months

3.24 If a Centre is rated as moderate or high risk and therefore additional monitoring is required, the Centre will be charged for the required additional monitoring, in line with the NOCN Fees and Charges.

3.25 As well as determining when the Centre will next receive monitoring, a Centre’s risk rating will also be considered by the Quality Assurance Team when making decisions regarding the Centre, including those on additional qualification approval and approval of DCS.

## 4. External Quality Assurance

### I. EQA Allocation

4.01 Upon Centre Approval, the Quality Assurance Team will allocate the Centre an EQA. Centres may be allocated more than one EQA dependent on the specialism requirements of the products within the Centre’s provision.

4.02 The EQA will be responsible for reviewing the Centre’s level of compliance with the approval criteria, as well as providing support to centres in meeting NOCN requirements through the sharing of best practice.

4.03 Any Conflicts of Interests regarding EQA allocations will be managed by NOCN as part of the NOCN Conflicts of Interest Policy and Procedure. Where a Centre believes there may be a Conflict of Interest with their EQA, they must notify the Quality Assurance Team as soon as possible to allow for this to be reviewed.

4.04 In order to ensure a fair and robust process and wherever it is possible, NOCN will amend a Centre’s EQA if they have monitored a Centre for a continuous period exceeding five academic years. In all cases, EQA allocations will be reviewed at the start of each academic year by the Quality Assurance Team and centres will be advised of any changes.

### II. External Quality Assurance Planning

- 4.05 EQAs will contact centres to arrange monitoring activities, unless it has been agreed by NOCN in advance that the activity must be conducted unannounced to the Centre. The Centre Contact/Quality Assurance Contact must work with the EQA to identify and agree convenient dates and times.
- 4.06 EQAs will electronically send a visit planner to the Centre at least **10 working days** prior to the EQA activity, except in the case of an unannounced visit or where visit arrangements do not allow. The planner will detail who will need to be present, observations planned, and the documentation and learner work that will need to be available. The EQA will want to meet or speak to learners and key Centre staff, wherever possible.
- 4.07 The Centre must provide the necessary support to the EQA to enable them to complete their monitoring activity as planned, including the provision of a quiet, secure area in which the EQA can work. It is the Centre Contact/Quality Assurance Contact's responsibility to ensure that all relevant staff, learners and sites/satellite centres are aware of the EQA activity.
- 4.08 If a Centre needs to cancel or re-arrange an EQA activity, then they must provide a minimum of **5 working days'** notice. NOCN understands that there may be mitigating circumstances where it may not be possible for the Centre to provide the full notice period. If a Centre fails to provide sufficient notice without reasonable cause, then they may be charged for the standard fee for the monitoring activity, as set out in the NOCN Fees and Charges.
- 4.09 If an EQA attempts to conduct a monitoring activity, however, is not able to complete it due to the Centre failing to inform NOCN of a change to the venue/time, or have failed to maintain accurate Centre details, the Centre will be charged for the cost of the monitoring activity.

### III. External Quality Assurance Activity

- 4.10 During each monitoring activity, the EQA will review Centre practices and records to ensure ongoing compliance with the approval criteria. The EQA will also provide information, advice and guidance to centres regarding both best training, assessment and internal quality assurance practice and on NOCN requirements, processes and resources.
- 4.11 Where a Centre delivers qualifications which are internally assessed, the EQA will also scrutinise the standard of the Centre's assessment and internal quality assurance practices and decisions. This will be required to take place before certification where the Centre does not hold DCS.
- 4.12 In scrutinising the standard of the Centre's assessment and internal quality assurance practices and decisions, the EQA will review evidence produced by the learner, in conjunction with the Centre's assessment and IQA decisions and records, to:
- a) Determine whether the assessment and internal quality assurance practices and judgements made by the Centre are valid, reliable, authentic, sufficient and current.
  - b) Ensure that all assessment requirements are met to support safe and valid claims for certification.
- 4.13 The EQA will make a judgement following each standards scrutiny activity to determine whether certification can be released. Where this is the case, the EQA will confirm this decision on the relevant External Quality Assurance report and approve submitted claims for certification by the Centre.
- 4.14 Where the EQA does not agree that the required process or evidence have been met to support learner certification, they will verbally confirm this to the Centre and correct the incorrect result.



This will be logged on the relevant External Quality Assurance Report. Centres will be able to gather further evidence/perform further assessments and re-submit work for EQA review. Centres may wish to appeal this decision (see Section 6).

- 4.15 Where a Centre does hold DCS, the EQA will retrospectively scrutinise Centre assessment practices and decisions following certification. The frequency and level of scrutiny will be based on the Centre's level of risk. The EQA will also continue to review the Centre's administration and management systems, resources, training, assessment and internal quality assurance systems over time to ensure consistency in practice.
- 4.16 It is the Centre's responsibility to provide access to the people and records identified by the EQA for quality assurance purposes. The EQA reserves the right to request access to any records they wish as part of their sampling strategy and plan. Failure to make individuals or records available as requested without justifiable cause could lead to the application of a Sanction against the Centre, and/or a charge for a monitoring visit.

#### IV. Adjustments to Centre Assessment

- 4.17 If, in performing the scrutiny of Centre assessment standards, the EQA identifies that a certificate has been claimed for by the Centre and issued, where the assessment evidence does not meet NOCN requirements, the EQA will correct the assessment decision of the Centre to accurately reflect the assessment evidence provided. The adjustment will be recorded on the External Quality Assurance Report, which will be shared with the Quality Assurance Team.
- 4.18 The Quality Assurance Team will review the EQAs correction to determine whether the learner's certificate is required to be revoked. The Centre must ensure that it accommodates all of NOCN's requests to resolve the matter as soon as possible.
- 4.19 NOCN will ensure that it takes all reasonable steps to prevent the revocation of learner certification, however, where this is required, NOCN will confirm this in writing to the Centre. Where an Adverse Effect has occurred, NOCN will promptly notify the Qualification Regulators.
- 4.20 The Centre is responsible for the safe return of any revoked certificates to NOCN, including contacting the learner to inform them of the certificate revocation. Failure to support NOCN in obtaining a learner's revoked certificate will be investigated in line with the NOCN Malpractice and Maladministration Policy and Procedure.

#### V. External Quality Assurance Reporting

- 4.21 Following completion of each monitoring activity, the EQA will discuss their findings with the Centre verbally. The EQA will confirm to the Centre their assigned overall risk rating from the activity, alongside their rationale, as well as discussing evidence of good practice and the details of any corrective action or recommendations for improvement. The EQA may provide the Centre with recommendations, provide them with actions or apply Sanctions:
- a) **Recommendations** are suggested amendments to current practice intended to further improve compliance arrangements. Implementation of recommendations is not mandatory.
  - b) **Actions** are mandatory and scope what is required to address areas of non-compliance.
  - c) **Sanctions** are penalties for non-compliance. Centres will be provided with Actions to detail the steps required to remove the Sanction, if applicable.
- 4.22 At the completion of the visit, the EQA will summarise and document their findings on the NOCN

External Quality Assurance Report. The report will be provided to the Centre **within 3 working days** of the monitoring date. At this point, the Centre will be provided with an opportunity to provide feedback on the activity to NOCN.

## VI. Monitoring of Centre Actions

- 4.23 If the EQA has set actions for the Centre, then these must be addressed, and evidence of completion provided to the EQA within the agreed timescales.
- 4.24 Where actions are deemed of high risk, the EQA will notify the Quality Assurance Team at NOCN. The Quality Assurance Team, in conjunction with the EQA, will monitor the Centre’s response to the actions.
- 4.25 The EQA will notify the Centre when action points have been satisfactorily addressed. At this point, the action will be deemed as closed and any relevant Sanctions applied due to the action will be reviewed.
- 4.26 A failure by a Centre to implement corrective action within the specified timescale is likely to result in the escalation of a Sanction to a higher level. Factors such as the prevalence, persistence and severity of non-compliances are also likely to lead to a higher-level sanction. Failure to address actions may also increase the Centre’s assigned risk rating, which will trigger additional monitoring (charges apply).

## VII. Sanction Levels

- 4.27 In instances of Centre non-compliance, where there is a risk to the integrity of NOCN products and/or to the interests of learners, NOCN may apply Sanctions against the Centre. Sanctions are penalties for non-compliance and, dependent on their level, affect a Centre’s approval, registration, certification or DCS rights.
- 4.28 NOCN has a range of Sanctions that can be applied to a Centre depending on the impact of the issues identified, the history of the Centre’s level of compliance with NOCN, and the risk to the interests of learners and the integrity of NOCN products. NOCN’s Sanctions tariff is detailed in the table below:

Level	Sanction	Indicative Rationale
1	Action Plan	<p>Non-compliance with NOCN’s Centre approval criteria or regulatory conditions that do not impede the integrity of NOCN provision.</p> <p>No immediate threat but limited confidence in certain areas has been identified.</p>
2	<p>Suspension or removal of Direct Claims Status</p> <p>Additional quality assurance visit<sup>4</sup></p>	<p>Threat to the integrity of NOCN provision and to the interests of registered learners.</p> <p>Failure to address level 1 actions given by NOCN/EQA.</p>

<sup>4</sup> Financial penalties will apply

3	Suspension of registration (3a)	Serious threat to the integrity of NOCN provision and to the interests of registered learners.
	Suspension of certification (3b)	Loss of the integrity of assessment decisions and danger of invalid claims for certification.
	Suspension of trainer/assessor/IQA approval	A failure to implement a specified action plan and corrective action.
4	Removal of qualification/course approval	Repeated breach of the regulations relating to a specific qualification.  Irretrievable breakdown in the management and quality assurance of specific qualifications or sector/subject area.
	Removal of trainer/assessor/IQA approval	Previously agreed corrective actions relating to a Level 3 non-compliance are not implemented.
5	Removal of Centre approval for all qualifications	Loss of confidence in the Head of Organisation or senior management of the Centre.  Irretrievable breakdown in the management and quality assurance of NOCN provision.  A failure to co-operate with NOCN requests to thoroughly investigate suspected malpractice.  Proven malpractice and/or maladministration, following an investigation by NOCN.  Consistent or repeated failure to pay invoices in agreement with NOCN Terms.

- 4.29 Sanctions can be recommended by the Centre’s EQA or applied by a member of the Quality Assurance Team. Any Sanctions recommended by EQAs at Level 2 or above will be ratified by the Quality Assurance Team before being applied.
- 4.30 The nature of the Sanction and the rationale for its application will be communicated either by the Centre’s EQA Report or by communication from the Quality Assurance Team.
- 4.31 The Quality Assurance Team monitor the application of Sanctions to ensure that they are consistently applied and report on Sanction activity to the Responsible Officer and the Quality Assurance Committee, where required.
- 4.32 NOCN will seek to support centres to comply with its requirements. Only in cases of serious non-compliance or the persistent failure of the Centre to address outstanding actions will NOCN apply the highest Sanctions (level 4 and 5). Notification of the application of this Sanction will be sent to the Head of Organisation at the Centre in writing.
- 4.33 Where a Level 5 Sanction is applied, all reasonable steps will be taken to protect the interests of any learners currently registered with NOCN. Centres must continue to demonstrate that they

are able to provide appropriate support, advice and guidance for learners throughout the withdrawal process. Please refer to the NOCN Centre Approval Policy and Procedure for further guidance.

## 5. Standardisation

- 5.01 As outlined by the approval criteria, it is the Centre's responsibility to ensure that the practices regarding training, assessment and internal quality assurance of its Centre is standardised and regularly reviewed to ensure best practice.
- 5.02 To support standardisation, NOCN organises training, support and standardisation sessions, which are available to its approved centres. NOCN strongly recommends that centres take part in these sessions, where possible.
- 5.03 Standardisation, training and support sessions will either be across all centres or will be sector specific and will provide delivery staff from across NOCN centres with the opportunity to obtain updates on quality assurance and share industry best practice.

## 6. Appeals

- 6.01 Centres who wish to appeal to NOCN against a decision made regarding a Centre assessment decision or the application of action or Sanction should refer to the NOCN Appeals Policy and Procedure.

## 7. Document Control

- 7.01 This policy is maintained by the Quality Assurance Team and will be reviewed and updated where necessary to reflect updated legislation, customer feedback, improvements of operation and changes to the regulatory environment. If you have any queries regarding the contents or the use of this policy, please contact the Quality Assurance Team directly on [assurance@nocn.org.uk](mailto:assurance@nocn.org.uk).
- 7.02 All NOCN policies and procedures are signed off by the NOCN Responsible Officer. The latest versions of which can be found on our website here: <https://www.nocn.org.uk/support/nocn-group-policies/>.