

REPORT ON THE
MONITORING OF
FOOD SAFETY
QUALIFICATIONS
IN WALES



May 2019

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1. Introduction

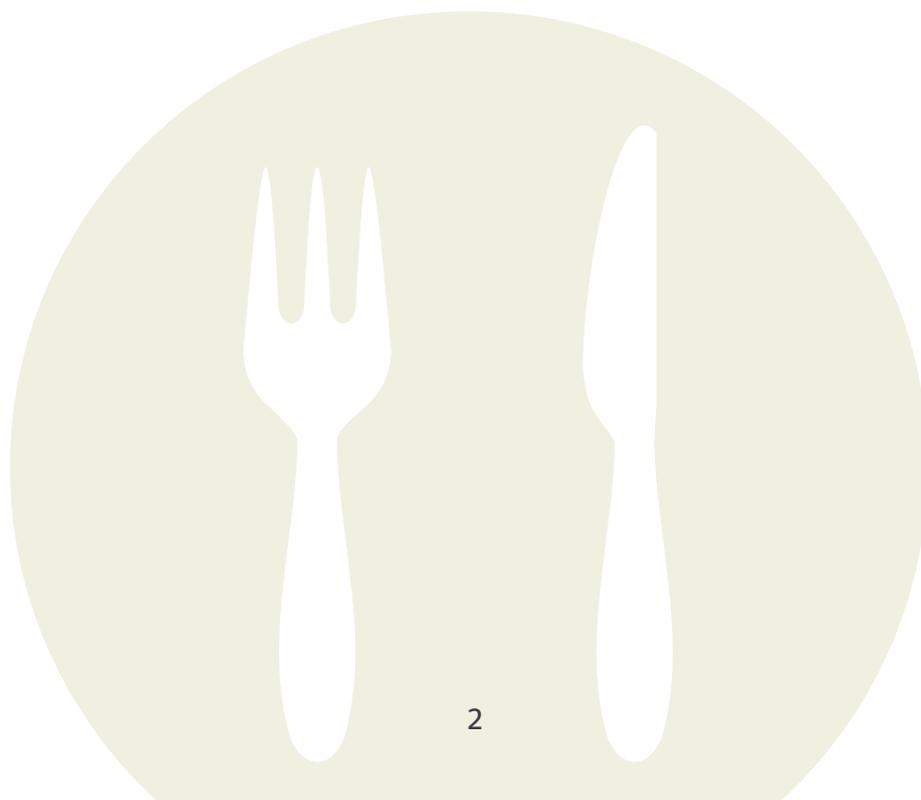
This report describes our monitoring of regulated food safety qualifications offered by recognised awarding bodies in Wales. It explains our rationale for undertaking the work; how we carried out the monitoring activity; and summarises our findings and the action we took as a result. The monitoring of food safety qualifications is part of our wider programme of monitoring vocational qualifications, as outlined in our Vocational Qualifications Strategy, published in December 2016.

Our monitoring focused on two key food safety qualifications offered across nine awarding bodies. These were the:

- Level 2 Award in Food Safety in Catering;
- Level 3 Award in Supervising Food Safety in Catering.

Note: there may be some variation in titles.

We wrote to the awarding bodies in March 2018, requesting evidence for our monitoring activity. With support from food safety and assessment experts, we reviewed the evidence against our Standard Conditions of Recognition, which set out our requirements relating to the design, assessment and quality assurance of these qualifications.



Findings

Overall, we were satisfied that the assessments were valid and led to reliable outcomes. Awarding bodies' approaches to assessment were suitable and the level of demand was appropriate. Centre management and quality assurance processes were generally found to be robust across awarding bodies.

Our monitoring identified some shortcomings across all nine awarding bodies, which we considered to be non-compliant with at least one of our Standard Conditions of Recognition. Where we identified non-compliance, we required awarding bodies to submit an action plan to us outlining how they planned to address the area/s of non-compliance. None of the issues of non-compliance were considered significant enough to require more formal regulatory action.

We identified some areas that required improvement but which we did not consider to be non-compliant with our rules. In these instances, we issued recommendations and asked the awarding bodies to consider our findings and respond with any proposed changes they would make.

We identified two common areas of non-compliance across awarding bodies:

- Command verbs¹ used in the assessment criteria did not align with what the learner is required to demonstrate during the assessment;
- Insufficient information was provided for centres to prepare learners for the assessment (generally in relation to the content coverage).

We also identified some issues of non-compliance which were specific to individual awarding bodies.

In addition to the non-compliance set out above, we identified a lack of comparability in some areas across awarding bodies. We asked the awarding bodies to consider the issues of comparability we had observed and respond to us outlining whether any steps could be taken to improve comparability.

¹ Command verbs in this context indicate what a learner must do in an assessment. For example, the word 'explain' is the command verb in 'explain why it is important to wash hands before handling food'. In this instance the word 'explain' would be incompatible with a multiple-choice question requiring learners to 'select' one correct answer from a range of given responses.

Follow-up activity

Many of the issues identified during the monitoring were common across awarding bodies. Given there was no existing forum for food safety awarding bodies to meet to discuss issues such as comparability, we invited the awarding bodies to attend two meetings to discuss the findings and to consider how they may be able to work together to improve comparability and consistency across these qualifications. This led to the establishment of a forum that we hope will ensure a more consistent approach is taken across awarding bodies going forward. We welcome the decision taken by the awarding bodies to set up this forum, and encourage all awarding bodies offering food safety qualifications to actively engage with the group.

The awarding bodies submitted action plans to us by our deadline of 1 February 2019. We reviewed the action plans to ensure that they were appropriate and fully addressed our concerns. We are monitoring how the awarding bodies are implementing their action plans.

Many agreed actions have already been addressed by individual awarding bodies, whilst for others, awarding bodies are progressing well towards the agreed objectives. For example:

- centre agreements have been updated;
- questions / examination papers have been redrafted;
- some awarding bodies have decided to change the method of assessment;
- one awarding body has decided to increase its examination's pass mark for greater comparability with other, similar qualifications;
- amendments are being made to command verbs to better align with the method of assessment used; and
- specifications are in the process of being updated to improve clarity and / or reflect other changes to the qualifications.

We are satisfied with the actions the awarding bodies are taking to ensure they are full compliant and welcome the collaborative work that has started through the newly formed forum. This should ensure greater consistency of practice across awarding bodies offering these qualifications. The action we have taken should provide confidence to employers choosing a regulated food safety qualification for their employees and for learners registered on these qualifications.

2. Approach to monitoring vocational qualifications

Our monitoring aims to ensure that vocational qualifications are fit for purpose when taken by learners in Wales. Our focused monitoring programme signals to awarding bodies that we have a keen interest in the quality of assessment of vocational qualifications.

We regularly review our monitoring plans to ensure that we are responsive to issues that arise – whilst also taking a strategic approach to the selection of qualifications for monitoring. We take several factors into account when deciding which qualifications to monitor, including whether qualifications:

- are eligible for public funding;
- have high numbers of entries and certifications;
- assess areas of work where safety is critical;
- meet a requirement for, or licence to, practise;
- provide entry to higher education; and
- have had concerns raised about them via our complaints or incidents processes.

Having considered these factors, we decided to focus our monitoring programme on qualifications in the following areas: First Aid (2017), Food Safety (2018) and Health and Safety (2019).

As part of our monitoring activity, we compare and contrast information and evidence from different awarding bodies to test compliance with our Standard Conditions of Recognition with a focus on:

- the validity and reliability of the assessment and the standards set;
- quality assurance processes; and
- the guidance provided to learning providers – and the extent to which this is enough to meet their needs.

Wherever possible, we seek to get feedback from learners, learning providers and other key stakeholders and involve subject and assessment experts in conducting some of the work.



3. The wider food safety landscape

The Food Standards Agency is ‘an independent Government department working across England, Wales and Northern Ireland to protect public health and consumers’ wider interests in food.’²

According to their website³: ‘In the UK, food handlers don’t have to hold a food hygiene certificate to prepare or sell food. Many food businesses will prefer that you do.’

The same website also states: ‘You must make sure that the food you place on the market is completely safe. The food you provide must not be harmful to people’s health or unfit for people to eat’ and that: ‘Local authorities are responsible for enforcing food hygiene laws’.

In effect therefore, as current legislation does not require that a qualification is to be completed to prepare or sell food, the decision about the ways in which staff are trained to meet the legislative requirements is left to those managing the business. They may choose to undertake internal or external training, which may or may not lead to a qualification. Qualifications may be regulated or non-regulated.

Qualifications Wales has no regulatory remit to consider either the quality of food safety training or the quality of non-regulated food safety qualifications.

² Food Standards Agency website - <https://www.food.gov.uk/about-us/who-we-are> [accessed 07.03.19]

³<https://www.food.gov.uk/business-guidance/registering-and-managing-a-food-business#food-hygiene-certificate> [accessed 29.10.18]



4. The food safety qualifications we regulate

Qualifications Wales regulates qualifications, other than degrees, in Wales. Established in 2015 through the Qualifications Wales Act, we regulate qualifications that are developed and delivered by the awarding bodies that we recognise. When an awarding body is recognised by us, it must comply with the rules that we set, including our Standard Conditions of Recognition. These set out requirements relating to design, assessment and quality assurance of qualifications. These Conditions also require awarding bodies to have robust monitoring processes to check the quality of their training providers.

We take the responsibility placed upon us as a regulator of awarding bodies offering food safety qualifications seriously. If an employer is choosing a qualification regulated by us for their employees, we want to make sure that the confidence they have in the quality of that qualification is well-placed. Consequently, an employer who selects a regulated qualification offered by one of our recognised awarding bodies can therefore reasonably expect the quality of the qualification and assessment to be of a good standard.

Food safety qualifications are among the highest certifying vocational qualifications in Wales. 14,980⁴ regulated food safety qualification certificates were awarded in Wales between 1 January 2018 and 31 December 2018.

A range of food safety qualifications was awarded in this period across Levels 1 – 4 and covering areas such as food safety in catering, manufacturing and retail. The majority of certifications were at Levels 2 and 3.

The combined total of certificates awarded for food safety qualifications relating to catering was much greater than the combined total for other food safety qualifications including manufacturing and retail. We therefore focused our monitoring on the two regulated food safety in catering qualifications below:

- Level 2 Award in Food Safety in Catering;
- Level 3 Award in Supervising Food Safety in Catering.

The Level 2 qualification was awarded in the greatest volume in Wales, whilst the Level 3 was selected due to its relatively large volume of certifications and its potential use as a progression route from the above Level 2 qualification.

We focused on these qualifications in the knowledge that the other food safety qualifications available to learners in Wales were offered by the same awarding bodies that offered the food safety in catering qualifications and were developed, assessed and quality assured in a similar way.

⁴ This includes some data in relation to qualifications / awarding bodies which are no longer regulated by Qualifications Wales.

The content of each of the above qualifications is largely common across awarding bodies. Each qualification has the same or similar assessment criteria and learning outcomes, regardless of which regulated awarding body offers the qualification. However, at the time we conducted the monitoring, there was no awarding body or sector group in place to oversee the development and associated requirements for food safety qualifications and to discuss issues of comparability across awarding bodies.

Courses leading to the achievement of food safety qualifications are generally delivered over a short period of time. For example, the Level 2 Award in Food Safety in Catering would typically be delivered over six to nine hours, whilst the Level 3 Award in Supervising Food Safety in Catering is typically delivered over 18 to 21 hours. This includes all learning and the completion of the required assessment. To successfully complete these qualifications, learners must demonstrate understanding against specified assessment criteria that assess underpinning knowledge and understanding of food safety. The qualifications do not assess professional competence or practical skills.

Table 1 below shows the number of certificates issued by awarding bodies for the selected food safety qualifications in Wales between 1 January 2017 and 31 December 2017.

Table 1: Certifications on food safety qualifications in Wales January 2017 – December 2017⁵

Qualification	Number of certifications
Level 2 Award in Food Safety in Catering	13,970
Level 3 Award in Supervising Food Safety in Catering	805
Total	14,770

Table 2 shows the awarding bodies included in the monitoring of food safety qualifications and the number of overall certifications by each awarding body between 1 January 2017 and 31 December 2017.

Table 2: Certifications by awarding body in Wales 1 January 2017 - 31 December 2017

Awarding body	Level 2 Award in Food Safety in Catering	Level 3 Award in Supervising Food Safety in Catering
AoFA Qualifications	240	0
British Safety Council	50	5
Highfield Qualifications	7,305	420
Industry Qualifications	15	0
NOCN	10	0
Qualsafe Awards	580	15
Qualifications Network	290	15
Royal Society for Public Health	2,105	70
VTCT	*	0
Total	10,590	528

Asterix denotes figures below 5.

⁵ This includes some data in relation to qualifications / awarding bodies which are no longer regulated by Qualifications Wales.

5. How we monitored the qualifications

We wrote to the nine awarding bodies offering the selected food safety qualifications in Wales in March 2018, setting out our monitoring approach and requesting evidence for us to review.

The monitoring activity focused on the extent to which assessment was valid and produced reliable outcomes. We also focused on the awarding bodies' processes for approving centres to deliver these qualifications and for monitoring centres on an ongoing basis. We monitored the awarding bodies against our Standard Conditions of Recognition, which set out requirements relating to the design and delivery of qualifications, assessment and quality assurance.

We reviewed the information submitted by awarding bodies during 2018. We undertook a desk-based review of qualification specifications, guidance materials, centre management processes and internal and external quality assurance procedures. We also contracted a panel of three external subject and assessment experts to conduct a technical review of assessment materials, samples of learner assessed evidence and accompanying internal and external quality assurance documentation.

We undertook two surveys using online questionnaires. One sought the views of learners who had recently completed one of the two food safety qualifications, and the second questionnaire sought the views of staff in centres that deliver these qualifications. The questionnaires were open from 14 August to 12 October 2018. Despite distributing the questionnaires to all centres delivering food safety qualifications in Wales, promoting the surveys on our website and via Twitter, we only received 34 responses to the learner questionnaire and 27 responses to the centre questionnaire. This represented a very small proportion of the learners that complete these qualifications and centre staff involved in their delivery and assessment. Therefore, our analysis of the data collected did not provide sufficient information on which to draw reliable conclusions.

As part of the monitoring of these qualifications, we engaged with our fellow qualification regulators, Ofqual in England and CCEA in Northern Ireland. We engaged with regulators to ensure they were aware of the work we were undertaking and updated them on our findings and our proposed action.

6. What we found

Overall, we were satisfied that the assessments were valid and led to reliable outcomes. Awarding bodies' approaches to assessment were appropriate, and we did not identify any issues with the assessments in relation to the level of demand. Centre management processes were generally found to be robust across awarding bodies.

Whilst our overall findings were positive, and the qualifications met their stated purpose, we identified some issues during our monitoring. However, these issues did not raise concerns that the awards were unsafe, and we were satisfied that they could be resolved by the awarding bodies implementing action plans. The issues are outlined below.

Areas of non-compliance

Our monitoring identified some shortcomings across all nine awarding bodies, which we considered to be non-compliant with at least one of our Conditions in at least one of the two qualifications. The same issues were seen across awarding bodies.

Qualification and assessment design

We found that seven out of the nine awarding bodies offering the Level 2 qualification, and all five awarding bodies offering the Level 3 qualification, were non-compliant with one aspect of Condition D1. This Condition states that the qualification will only be fit for purpose if that qualification, as far as possible, secures the requirements of validity, reliability, comparability, manageability and minimises bias for learners. One aspect we considered during the review of evidence was to consider whether the published assessment criteria (that is, what the qualification states it is testing the learners are able to do) are aligned with what they actually need to do to successfully complete the assessment. This is one aspect that we check as part of reviewing the validity of the qualification.

We found that in some cases there was a lack of alignment between the command verbs in the assessment criteria which state what the learner is required to demonstrate and what they were subsequently asked to do in the assessment. For instance, we saw examples of assessment criteria which required that a learner could 'explain', 'outline' or 'describe' to successfully achieve the criteria. However, the approach taken to the assessment (often through the use of multiple-choice examinations) did not always allow the learner the opportunity to demonstrate these skills. Despite this, we did consider that what the learners were required to demonstrate during the assessment was valid in meeting the purpose of the qualification. Therefore, in this instance, this did not significantly undermine the validity of the qualification. However, awarding bodies should ensure that their qualification development and review processes ensure that there is alignment between assessment criteria and the assessment. Our monitoring identified some examples where awarding bodies had already identified and remedied this issue during their qualification review process.

Sufficiency of information for centres

We found that five out of the nine awarding bodies offering the Level 2 qualification and three out of the five awarding bodies offering the Level 3 qualification were non-compliant with Condition D8, which states that an awarding body must provide sufficient information for teachers to enable them to effectively deliver the qualifications. We also found that four out of the nine awarding bodies offering the Level 2 qualification, and two out of the five awarding bodies offering the Level 3 qualifications, were non-compliant with Condition E3.2(f). This Condition states that an awarding body must ensure that the specification for a qualification sets out the knowledge, skills and understanding that will be assessed as part of the qualification (giving a clear indication of their coverage and depth). In this instance, the specification did not include sufficient information for centres on the knowledge required to be covered to prepare learners for the assessment.

Where indicative content had been included in specifications, it was considered to be at the right level of detail to provide centres with sufficient information to prepare learners for all aspects of the assessment. We also saw good examples, where awarding bodies provided additional resources to support those delivering the qualifications.

Other issues of non-compliance

In addition to the above, there were a number of awarding body-specific issues of non-compliance; examples of these are discussed below.



Validity and reliability of the assessment

One awarding body offering both the Level 2 and Level 3 qualifications, and one awarding body offering the Level 2 qualification, were found to be non-compliant with other areas linked to Condition D1.2(a), as defined above (for example, a lack of guidance and quality assurance of one element of the assessment).

One awarding body offering the Level 2 qualification was found to be non-compliant with Condition D1.2(b), which states that a qualification will only be fit for purpose if that qualification, as far as possible, secures the requirements of reliability. In this instance, there was a lack of clarity and guidance on one aspect of the assessment that had the potential to affect the consistency of assessment outcomes as assessors could interpret assessment requirements in different ways.

Publication of a specification information in relation to setting the assessment

One awarding body offering the Level 2 qualification was found to be non-compliant with Conditions E3.2(g) and (j), which state that an awarding body must ensure that the specification for a qualification sets out the method of any assessment and any associated requirements relating to it and any specified levels of attainment, and Condition G1.1(c), which states that an awarding body must ensure that the content of the assessment is consistent with the specification for that qualification. In this instance, the awarding body had not included relevant information in its specification.

Setting the assessment

One awarding body offering the Level 3 qualification was found to be non-compliant with Condition G1.1(a), which states that an awarding body must ensure that the content of the assessment is fit for purpose. In this instance, there were technical errors in some questions, which undermined the validity of the assessment.

Marking the assessment

One awarding body offering the Level 2 qualification and one awarding body offering the Level 3 qualification were found to be non-compliant with Condition H1.1(a), which states that an awarding body must have in place effective arrangements to ensure that, as far as possible, the criteria against which learners' performance will be differentiated are understood by assessors and accurately applied. In this instance, some incorrect answers had been marked as correct.

Comparability

We also identified that there was a lack of comparability across awarding bodies in some areas. We saw differences in approaches, which included the methods of assessment used, the length of the assessment, and what learners were required to do to pass the assessment. This had the potential to undermine the comparability of the qualifications, under Standard Condition D1.2(c) and H3.1(c).

The above point took the form of a recommendation to awarding bodies, rather than non-compliance.

7. What action we took

Request for action plans

Following our monitoring, we concluded that the issues we identified could be addressed through submission of action plans. In the autumn of 2018, we outlined our findings to each awarding body and set out what we expected them to do to address the non-compliance that we had identified.

We required all nine awarding bodies (AoFA Qualifications, British Safety Council, Industry Qualifications, Highfield Qualifications, NOCN, Quallsafe Awards, Qualifications Network, Royal Society for Public Health and VTCT) to submit an action plan to us, setting out how they were going to address the non-compliance that we had identified, to ensure that they fully meet our Standard Conditions of Recognition.

Where we made recommendations (which did not amount to non-compliance), or sought further clarification, awarding bodies were asked to consider these issues and outline their response to them.

Awarding body meetings and forum

We invited all the awarding bodies included in the monitoring activity to attend a meeting in November 2018 to discuss key findings. In the absence of an existing forum for food safety awarding bodies, the intention of the meeting was to provide an opportunity for issues of comparability and consistency to be jointly discussed and to inform awarding bodies' action plans.

The meeting was well attended, and all delegates actively engaged in the process. Awarding bodies agreed that there was merit in arranging a further meeting to explore the possibility of setting up an awarding body food safety forum.

We facilitated a second meeting in January 2019. In this meeting, all awarding bodies contributed positively and agreed the way forward to establish a forum for food safety qualifications. It was agreed that terms of reference for membership would be decided in the first forum meeting in March 2019. This forum is independent of Qualifications Wales and managed by awarding bodies; it will provide a regular opportunity for them to discuss a range of issues, including comparability across their food safety qualifications in the future.

Action plan submission

Each awarding body submitted an action plan to us by 1 February 2019 outlining the changes they a) have already made and b) propose to make. It was evident that all awarding bodies were addressing our findings and were taking appropriate action to resolve any non-compliance and act on our recommendations.

Qualifications Wales will monitor each of the awarding bodies' action plans until all actions are completed to our satisfaction.

8. Conclusion and next steps

We conclude that overall, these food safety qualifications are valid, reliable and meet the reasonable needs of learners in Wales. Where issues were identified through our monitoring, we took a proportionate, transparent and targeted approach by requesting action plans from the awarding bodies.

We are pleased that all awarding bodies responded positively to the findings of our monitoring and sought to address the areas of non-compliance through the submission of an action plan. Many of the identified actions have already been completed whilst others are on track to be completed soon. This includes:

- redrafting of centre agreements and examination papers;
- changes to the method of assessment;
- an increased pass mark; amendments to command verbs; and
- amendments to specifications to improve clarity and / or reflect other changes.

The action we have taken should provide confidence to employers choosing a regulated food safety qualification for their employees and for learners registered on these qualifications.

The shortcomings identified during the monitoring of food safety qualifications may not be confined to that sector. We recommended that each awarding body that was part of this monitoring activity should review their other vocational qualifications in light of our findings and their non-compliance.

We will be monitoring health and safety qualifications in 2019, when we will maintain our focus on the validity and reliability of vocational qualifications. We may also undertake other monitoring activities of vocational qualifications in response to issues we identify. We will continue to work with our fellow regulators to share any concerns on the delivery, assessment and award of vocational qualifications and discuss how we can work collaboratively to address those concerns.

We encourage all awarding bodies offering regulated qualifications to consider whether the issues we have identified are also a risk to the validity of the qualifications they offer, and if so, take appropriate action to address those issues.