



# **Audit Report**

**Highfield Awarding Body for Compliance (HABC)**

**4 July and 4 September 2013**

## Note

Restricted or commercially sensitive information gathered during SQA Accreditation's quality assurance activities is treated in the strictest confidence. However, please note the following:

- ◆ The findings of this report and the associated Action Plan will be presented to SQA's Accreditation Committee.
- ◆ The report and Action Plan will be published on SQA Accreditation's website following receipt of the signed acceptance of audit findings.
- ◆ The contents will contribute towards the Quality Enhancement Rating which will, in turn, contribute towards the quality assurance activity and timescales.

Please note that SQA Accreditation's quality assurance activities are conducted on a sampling basis. Consequently, not all aspects of an awarding body's performance in quality assurance, contract compliance, implementation, awarding of certificates and fee arrangements (not an exhaustive list) may have been considered in this report to the same depth.

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## Executive summary

This was the second audit of Highfield Awarding Body for Compliance (HABC) since it was approved as an awarding body by SQA Accreditation in 2010.

### 1.1 Scope and approach

The audit was designed to review and evaluate HABC's strategies, policies and procedures to ensure compliance under SQA Accreditation's *Regulatory Principles (2011)*, **Regulatory Principles Directives, the requirements of the clauses within and any conditions attached to the approved awarding body agreement and the Criteria for Accredited Qualifications.**

As this was a full audit of HABC, all Principles were included within the scope of the audit.

A Requirement has been raised where SQA Accreditation found evidence that the awarding body has not met SQA Accreditation's regulatory requirements.

The following timescales apply:

- ◆ SQA Accreditation will issue this report within 30 working days of the audit date.
- ◆ The awarding body must sign and return the audit report and associated Action Plan within 30 working days of the audit report being issued.
- ◆ Within a further 20 working days of receiving the proposed action plan, SQA Accreditation will confirm whether the Action Plan is appropriate to address the Requirements. This will be subject to the actions proving appropriate to the issues raised.
- ◆ SQA Accreditation will monitor progress towards completion of the actions identified in the Action Plan.

A Recommendation may be recorded in instances where SQA Accreditation considers there to be scope for improvement. Where these are agreed during the audit, they are recorded on the report for future reference. As Recommendations are recorded for awarding body consideration only, it is not necessary to agree either actions or timescales to resolve these in the awarding body Action Plan.

## 1.2 Awarding body audit report timeline

HABC audit date	4 July and 4 September 2013
SQA Accreditation audit report date	25 September 2013
Date audit report and Action Plan to be signed and submitted by HABC	6 November 2013

## 1.3 Background

HABC is a nationally recognised awarding body that offers compliance qualifications in a range of areas including health and safety, security, first aid, teaching and licensing.

HABC's headquarters are situated in Doncaster.

The audit team was provided with full access to the awarding body's premises, staff and documentation.

## 1.4 Overview

As a result of the audit and post-audit activities, one Requirement has been raised and four Recommendations have been recorded.

The one Requirement forms the basis of the HABC Action Plan. This must be completed and submitted to SQA Accreditation for agreement within 30 working days of the audit report being issued. The Action Plan must be submitted by 6 November 2013.

Outcome(s)	Area(s) of concern	Risk rating
Requirement 1	Principle 1	Low
Recommendation 1	Principle 2 and Principle 10	n/a
Recommendation 2	Principle 6	n/a
Recommendation 3	Principle 6	n/a
Recommendation 4	Principle 22 Regulatory Principles Directive RPDIR 3	n/a

## 2 Audit findings

The following sections detail Requirements raised and Recommendations recorded against SQA Accreditation's *Regulatory Principles (2011)*, Regulatory Principles Directives, the requirements of the clauses within and any conditions attached to the Approved Awarding Body agreement and the Criteria for Accredited Qualifications.

### 2.1 Requirements

**Principle 1. The awarding body must deal with SQA Accreditation in an open and co-operative way, and disclose anything which SQA Accreditation would reasonably expect to be made aware.**

During the preparation for the audit it was noted that the awarding body had placed two centre lists on Quicr. The earlier of the two lists was uploaded in September 2012 with the latter being uploaded in June 2013.

Whilst the earlier of the two lists fully met SQA Accreditation's information requirements in respect of approved centres, the latter did not. The most recent list failing to provide any information in respect of centre contacts, accredited qualifications, activity status, as well as numbers of candidate registrations and certifications.

Further concerns were raised in respect of the accuracy and consistency of the information provided by a third centre list, dated 31 May 2013, which was provided independently of the audit process to assist in addressing issues identified as a consequence of the last tranche of centre monitoring.

A comparison of all three lists indicated that centres appeared to be present in some lists but not others. In at least one instance it was noted that a currently active centre in Scotland was omitted from the June 2013 list.

The evidence available indicates that HABC does not meet the requirements of Principle 1. **This has been raised as Requirement 1.**

### 2.2 Recommendations

**Principle 2. The awarding body must publish clear information on their products, services and associated charges and fees.**

And

**Principle 10. The awarding body must ensure that, where possible, progression or outcome opportunities for learners are clearly identified in terms of qualification pathways or employment opportunities.**

A review of the awarding body's website prior to the audit noted that there were no factsheets available for the *HABC Emergency First aid at Work at SCQF Level 5 (R282 04)* and the *HABC First Aid at Work at SCQF Level 6 (R283 04)*. However, the Auditors were able to find evidence of Factsheets for all other SQA accredited provision.

Discussions with HABC representatives indicated that the awarding body had chosen not to make the factsheets available at this time as the organisation was still involved in discussions around the practicalities of implementing the assessment principles document for First Aid.

The Auditors noted that HABC runs a number of UK-wide events to support continuous professional development (CPD) events in support of approved centre staff delivering a range of SQA accredited qualifications. For example, the awarding body had scheduled an event on 29 July 2013, to be held in Stirling, in support of the new Scottish Certificate for Personal Licence Holders (SCPLH) qualification and the SCPLH Refresher qualification.

However, the Auditors noticed that despite the availability of a range of CPD events in support of First Aid qualifications there was no reference to the SQA versions. Indeed, the only evidence of a Scottish event, May 2014 in Edinburgh, appeared to solely focus upon the QCF versions of the qualifications.

HABC representatives will ensure that all issues round the availability of relevant documentation and focused activities in support of the SQA accredited provision are resolved on satisfactory conclusion of discussions around the assessment principles document for First Aid. **This has been recorded as Recommendation 1.**

**Principle 6. The awarding body and their approved centres must have the relevant expertise, quality assurance procedures, technological, financial, human resources and other physical resources, to carry out their regulated functions, during the life of the qualifications and Units they offer.**

Prior to the audit, discussions with SQA accreditation's Research and Information Section indicated that the awarding body had not referenced all of the relevant SQA accredited awards within the quarterly registration and certification data return which is a mandatory requirement for all approved awarding bodies.

The qualifications in question were the *HABC Emergency First aid at Work at SCQF Level 5 (R282 04)*, the *HABC First Aid at Work at SCQF Level 6 (R283 04)* and the *HABC Award for Upskilling Door Supervisors (Scotland) (R234 04)*.

Both First Aid qualifications were accredited on 13 March 2013 but were not included within any data returns by the time of the audit.

The Upskilling Door Supervisors award was accredited on 11 July 2012 and its first appearance in a quarterly return was not until Quarter 4, January–March 2013.

SQA Accreditation's *Regulatory Principles Directive RPDIR – 2 Data Submissions*, dated 11 September 2012, states that if no registrations or certifications appear against any particular qualification, this field should read '0'. The qualification should not be omitted from the spreadsheet if it has zero uptake'.

Therefore, HABC may wish to ensure that all future quarterly returns make reference to all SQA accredited provision. **This has been recorded as Recommendation 2.**

H2020 is HABC's Corporate Governance System. As well as being the platform for HABC's Risk and Issue management the system also allows real time reporting on all governance arrangements for the business. HABC recently modified their centre management system housed within their Quality Assurance IT System, which has been designed to support, shape and retain evidence of a range of centre engagements including quality assurance. On the day of the audit, HABC's intention to thoroughly explain and demonstrate the system was unsuccessful. This was due to an unfortunate failure of the awarding body's IT systems for a number of hours during the afternoon.

This was particularly frustrating for all parties as it was hoped that a review of the system would provide sufficient evidence to allow the audit team to close out an outstanding compliance issue from the awarding body's centre monitoring report for the period 19 October to 13 December 2013.

As the Quality Assurance IT system was integral to ensuring that the awarding body's activities are proportionate in respect of centre engagement, it was agreed by all parties that a further date should be arranged at which HABC can outline the system in some detail to SQA Accreditation's Regulation team.

On 4 September 2013, HABC's Director of Strategic Development and Quality Systems Manager provided a detailed overview of the H2020 system and its current links to other internal databases such as the awarding body's Learner Management System.

Based upon an existing system containing several platforms for the support of corporate governance, qualification development and centre management developed by an external IT Solutions company, the H2020 system is a bespoke version of that system designed to support HABC from a corporate governance standpoint.

The Quality Systems Manager explained the awarding body's intention of ensuring that the H2020 system will underpin and be driven by the awarding body's risk management process. HABC has recently instigated a policy which ensures that all departments hold monthly risk management meetings, with the relevant departmental manager tasked with updating information within the system in respect of new or ongoing risks and actions proposed or taken in mitigation.

This process supports bi-monthly meetings between the Quality Systems Manager and all Heads of department, which in turn informs the reporting of all extant corporate risks to HABC's Senior Management Team.

The input of information from the awarding body's range of centre engagements constitutes part of this process and the Auditors were able to evidence information in respect of approved centres delivering SQA accredited qualifications contained within HABC's new internal quality assurance system, launched in July 2013.

The Quality Assurance System is subject to a phased role out to be completed in September 2014 and as a consequence, it was noted that only certain individuals within the organisation currently have access to the system and are able to input data.

During the overview the Auditors were able to interrogate the new system, in respect of the risk rating of centres delivering SQA accredited provision, evidencing the process for allocating an initial risk rating following approval, the frequency and nature of changes to risk, as well as the rationale behind such changes.

This process identified a number of flaws in the system such as a perceived lack of clarity and standardisation around input of some information and the consequent reasons for adjustments to risk ratings of some sampled centres. Discussions with the awarding body's representatives suggested that a system for applying weighting and tolerances to centre issues that would inform decision making over the allocation of risk has yet to be fully developed. It was agreed that guidance in this area would be of benefit to awarding body staff as the system is rolled out.

It was also noted that there was only limited information held on centres. Data has yet to be fully transferred over onto the new Quality Assurance system in a number of cases and it was noted by the Auditors that HABC already considers this to be an ongoing action across the remaining phases of its implementation plan. A programme of systematically populating the system with historical information only began as of August 2013.

The Auditors also noted that further work was required within the system to rationalize and standardise the types of visit which can be conducted by HABC representatives, given the fact that it is now a mandatory field, to again ensure consistency of information and subsequent action.

Generally speaking though, the Auditors were content that there was sufficient information presented to demonstrate that the majority of the centres sampled had been visited and risk rated. As a consequence, the Auditors are now happy to close out the outstanding compliance issue from the HABC centre monitoring report for the period 19 October to 13 December 2013.

As the Quality Assurance System is in development, it is recommended that the awarding body's representatives keep SQA Accreditation updated on progress across the respective phases of the implementation plan. This will be crucial in informing the focus of the qualification regulator's ongoing quality assurance activities at centre level. **This has been recorded as Recommendation 3.**

**Principle 22. The awarding body must ensure that qualification and Unit certificates meet SQA Accreditation's minimum requirements, reflect learner achievement, are only issued on the basis of a valid claim, and are supplied within a reasonable and clearly communicated timescale.**

The Auditors were able to review exemplar certificates prior to the audit and were also presented with a number of sample certificates on the day of the audit itself.

Though having no major concerns with the certificates provided, the Auditors identified a number of minor changes for consideration. Firstly, the use of the phrase 'has successfully passed an assessment in' was viewed as possibly misleading in the case of certification of achievement for qualifications that were constructed around multiple assessments.

In respect of credit rated qualifications, the Auditors noted the use of the statement 'The above qualification has been credit rated by SQA credit rating body'. HABC representatives were advised that there is no specific entity as SQA credit rating body, the activity itself forming part of SQA's overall corporate function. Therefore, the awarding body may wish to amend the statement to remove the phrase 'credit rating body' as it is superfluous in this context.

Lastly, HABC may wish to give further thought to the use of the SCQF logo on the relevant qualification certificates of achievement. The exemplar certificates held on Quickr, as well as the sample certificates provided on the day, indicate that the awarding body has chosen not to use the SCQF logo. Such a stance is compliant with Regulatory Principles Directive 3 which states that the use of the logo is optional. However, the Auditors noted the use of the SCQF logo on the sample unit certificate and would suggest that a more consistent approach to the use of logos across both types of certificate may be more beneficial to ensuring that all stakeholders have a clear and consistent understanding of SCQF credit rating.

A review of the suggested minor changes to wording, credit rating body references and the use of the SCQF logo on certificates has been recorded as **Recommendation 4**.

### 3 Outstanding approval and accreditation conditions

A condition will be recorded at the time of approval of the awarding body or at the time of accreditation for an SQA accredited qualification. A condition is recorded when SQA Accreditation's Co-ordination Group (ACG) finds evidence that the awarding body does not fully meet the requirements under SQA Accreditation's *Regulatory Principles (2011)*, Regulatory Principles Directives, the requirements of the clauses within and any conditions attached to the Approved Awarding Body agreement and the Criteria for Accredited Qualifications.

Principle no.	Condition	Date due
None		

## 4 Risk rating of Requirements

SQA Accreditation assigns a risk rating to each Requirement recorded as a result of awarding body quality assurance activity. The table below illustrates how the rating for a Requirement is assigned. A weighting is applied that depends on the risk identified and the possible impact on qualifications and/or the learner of failure to implement that Requirement.

The assignment of a risk rating allows an awarding body to assign their resources to areas which have been identified as having a major impact on the qualifications and/or the learner. The risk rating also allows SQA Accreditation to assign its resources to support awarding bodies in improving their performance.

Risk	Impact of Requirements identified through quality assurance activity
Very Low	The Requirement has been identified as likely to cause minimal concern and would not threaten the integrity of the qualification or impact adversely on the learner. Any overall effect is likely to be small scale and/or localised, rather than widespread. The identified Requirement is unlikely to recur once resolved and no long lasting damage would be anticipated.
Low	The Requirement has been identified as low impact but is of sufficient importance to merit intervention, with a low threat to the systems or procedures associated with the qualification and/or impact on the learner. Disruption may not just be localised but more widespread and would possibly cause residual damage; however, this could be easily corrected without further consequence.
Medium	The Requirement has been identified as having the potential to damage the credibility of the qualification and/or be detrimental to the learner. There may be some impact to the systems or procedures that support the qualification or the operational effectiveness of the awarding body.
High	The Requirement has been identified as having a potentially high impact on the integrity and reliability of the qualification, or the effective operation of the awarding body as a whole, if corrective action is not quickly taken. There is a high probability that the qualification and/or learner will be negatively affected.
Very High	The Requirement has been identified as having a serious impact on the integrity and reliability of the qualification or the effective operation of the awarding body if corrective action is not immediately taken. There is a very high probability that the qualification and/or learner will be negatively affected.

In assigning a risk rating, each Requirement is considered on its own merit, taking account of the context in which it was identified.

## 5 Table of awards

Accredited qualifications currently offered by HABC:

SQA-accredited qualification title	Level	Code	Accreditation date	Re-accreditation date
HABC Award for Scottish Personal Licence Holders (on and off sales)	n/a	R076 04	04/05/10	31/07/13
HABC Award in CCTV Operations (Public Space Surveillance) (Scotland) at SCQF Level 6	SCQF Level 6	R129 04	13/04/11	31/12/13
HABC Award in Security Guarding (Scotland) at SCQF Level 6	SCQF Level 6	R130 04	13/04/11	31/12/13
HABC Award in Door Supervision (Scotland) at SCQF Level 6	SCQF Level 6	R131 04	13/04/11	31/12/13
HABC Award for Upskilling Door Supervisors (Scotland)	n/a	R234 04	11/07/12	31/12/13
HABC Emergency First Aid at work at SCQF Level 5	SCQF Level 5	R282 04	13/03/13	31/03/17
HABC First Aid at Work at SCQF Level 6	SCQF Level 6	R283 04	13/03/13	31/03/17
Scottish Certificate for Personal Licence Holders at SCQF Level 6	SCQF Level 6	R354 04	01/08/13	30/09/18
Scottish Certificate for Personal Licence Holders (Refresher) at SCQF Level 6	SCQF Level 6	R355 04	01/08/13	30/09/18

## 6 List of documents reviewed pre and post audit

Document title	Date of issue	Version number
HABC Corporate Governance Manual	Revised 28 May 2013	Version 2.0
HABC Centre Code of Conduct and Centre Agreement		
HABC Quality Assurance Strategy		
HABC Appeals Policy		
HABC Application for a Replacement Certificate		
HABC Account Manager Operations Manual		
HABC EQS Operations Manual		
HABC Centre Welcome Pack	Revised 17 September 2012	Version V1
HABC Core Manual	Revised 13 May 2013	Version V2.3
HABC Reasonable Adjustments Policy		
HABC Use of Languages and Translation Policy		

Document title	Date of issue	Version number
HABC Special Consideration Policy		
HABC Customer Service Statement		
Fact Sheet: Personal Licence		
Qualification Specification Award for Scottish Personal Licence Holders (On and Off Sales)	November 2011	Version 5
Fact Sheet: CCTV		
Specification Award in CCTV Operations (Public Space Surveillance) (Scotland) at SCQF Level 6		
HABC Identification Validation	5 September 2012	
Qualification Specification HABC Award for Upskilling Door Supervisors (Scotland)	March 2013	Version 2
Fact Sheet: Door Supervision		
Qualification Specification HABC award in Door Supervision (Scotland) at SCQF Level 6	December 2012	Version 6
Fact Sheet: Award in Security Guarding (Scotland) at SCQF Level 6		
Specification Award in Security Guarding (Scotland) at SCQF Level 6		

<b>Document title</b>	<b>Date of issue</b>	<b>Version number</b>
HABC Quality Assurance System		

## 7 Action Plan

A separate document in Microsoft Word has been forwarded with this Audit Report.



Areas of concern	Requirement	Risk rating	Proposed action <small>(Please include a description of your intended methodology and details of the evidence that will be provided.)</small>	Target date for completion
Principle 1	The Auditors identified concerns in respect of the accuracy and consistency of information provided by HABC in respect of approved centres delivering SQA accredited qualifications.	Low	Provide SQA Accreditation with correct template for centre details. Completed 8 July 2013	8 July 2013

### Signatures of agreement of action plan

For and on behalf of Highfield Awarding Body for Compliance:

For and on behalf of SQA Accreditation:

**Signature**

**Signature**

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**Date**

**Date**

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## 8 Acceptance of audit findings

For and on behalf of Highfield Awarding Body for Compliance:

For and on behalf of SQA Accreditation:

Signature

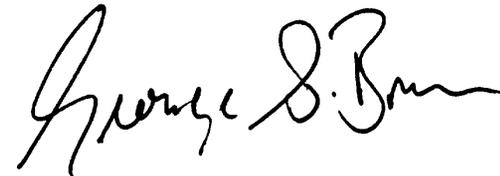


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Designation Chief Executive

Date 14/11/2013

Signature



Designation Head of Accreditation

Date 18 November 2013