



Audit Report

Equestrian Qualifications GB Limited (EQL)

9 June 2014

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1 Background

This was the twelfth audit of the Equestrian Qualifications GB Limited (EQL) since it was approved as an awarding body by SQA Accreditation in 1994.

EQL is an approved awarding body that works in partnership with a variety of organisations such as The British Horse Society and the British Equestrian Federation to develop and award qualifications for the equestrian industry.

EQL's headquarters are situated in Kenilworth, Warwickshire.

1.1 Scope

SQA Accreditation carries out quality assurance activity in line with our *Quality Assurance of Approved Awarding Bodies Policy*. This states the type and frequency of our quality assurance activities, describes our reporting procedures, and indicates how the awarding body's Quality Enhancement Rating is calculated.

As this was a full audit of EQL, all regulatory requirements were included within the scope of the audit. Our quality assurance activities are conducted on a sampling basis and consequently, not all aspects of an awarding body's systems, procedures and performance have been considered in this report to the same depth.

The audit was designed to ensure EQL complies with SQA Accreditation's regulatory requirements namely:

- *SQA Accreditation's Regulatory Principles (2014)*
- *all Regulatory Principles Directives*
- the awarding body's Accreditation Licence.

Awarding body documentation considered for review by the Audit Team includes all documents banked on EQL's Quickr place at the time of audit and information supplied to support audit activity. Restricted or commercially sensitive information gathered during SQA Accreditation's quality assurance activities is treated in the strictest confidence.

1.2 Audit Report and Action Plan Timescales

EQL audit date:	9 June 2014
Audit Report approved by Accreditation Co-ordination Group on:	16 July 2014
Audit Report to be signed by EQL:	3 September 2014
Action Plan to be emailed to regulation@sqa.org.uk by EQL:	3 September 2014

The process will apply in relation to the timescales specified above:

- ◆ The awarding body will be sent two signed copies of the Audit Report by post.
- ◆ The awarding body must sign both copies of the Audit Report and return one by post to SQA Accreditation in accordance with the timescale specified above.
- ◆ The awarding body will also be e-mailed a copy of the Audit Report (for information only) and an electronic copy of the Action Plan.
- ◆ The awarding body must complete and return the Action Plan in accordance with the timescale specified above and e-mail this in Microsoft Word format to regulation@sqa.org.uk.
- ◆ SQA Accreditation will confirm when the Action Plan is appropriate to address the Issues and present it to Accreditation Co-ordination Group (ACG) for approval.
- ◆ Following approval by ACG, the awarding body will be sent two signed copies of the approved Action Plan by post.
- ◆ The awarding body must sign both copies of the Action Plan and return one by post to SQA Accreditation.

The findings of this Audit Report and the associated Action Plan will be published on SQA Accreditation's website following signed agreement.

SQA Accreditation will continually monitor progress towards completion of the proposed actions identified in the Action Plan and update the awarding body's Quality Enhancement Rating as appropriate.

1.3 Summary of Audit Issues and Recommendations

An Issue has been recorded where evidence shows that the awarding body is not compliant with SQA Accreditation's regulatory requirements. The awarding body must address the Issues and specify corrective and preventative measures to address them through its Action Plan.

The Action Plan is e-mailed to EQL as a separate document to the Audit Report and must be submitted to SQA Accreditation in accordance with the timescale specified in 1.2.

As a result of the audit and post-audit activities, three Issues have been recorded and five Recommendations have been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principle 1	EQL's revised policies, procedures and guidance documentation have been written primarily with Ofqual in mind. Although, a number of references to SQA Accreditation exist they are often generic (i.e. SQA), not applied consistently across the documentation and do not indicate a detailed knowledge of SQA Accreditation's current regulatory requirements.	Medium
2. Principle 14	A review of EQL's Maladministration and Malpractice Policy, April 2014, and Maladministration and Malpractice Procedure, April 2014, indicates a potential for inconsistency regarding the need to inform SQA Accreditation of any suspected cases of malpractice or maladministration.	Low
3. Principle 15 Regulatory Principles Directive – RPDIR 3	EQL's Unit certificate template misrepresents the role of the SCQF by encouraging stakeholders to believe that it is a type of qualification akin to the status afforded qualifications that reside within the QCF.	Low

A Recommendation has been noted where SQA Accreditation considers there is potential for improvement. The awarding body is advised to address any Recommendations noted as good practice; however, measures to correct or prevent these are not mandatory and therefore do not form part of the Action Plan.

Recommendation	Detail of Recommendation noted
1. Principle 4	EQL may wish to consider creating terms of reference for the Risk Management Group which includes the purpose of the group, its membership, timescales for operation and reporting structures. This may ensure that the group is fit for purpose and meets awarding body operational requirements.
2. Principles 5 and 13	EQL may wish to revise the <i>Appeals and Complaints Policy, March 2014</i> , to ensure that there is a clear rationale behind its approach to administrative charges for appeals.
3. Principle 11	EQL may wish to consider advising centres to consult with their appointed External Verifier before confirming with a learner that any request for a reasonable adjustment to the assessment process has been approved.
4. Principle 12	EQL may wish to revise the <i>Appeals and Complaints Policy, March 2014</i> , to ensure that there are clear and measurable timescales allocated to all stages of the process of making a complaint.
2. Principle 15	EQL may wish to consider amendments to the current method of recording unit titles and the associated SCQF credit and levels to ensure that no confusion arises in respect of any SQA accredited unit title.

1.4 Risk Rating of Issues

SQA Accreditation assigns a rating to each Issue recorded depending on the impact or risk on the awarding body's operations, its SQA accredited qualifications and/or the learner.

Issues recorded during the audit will count towards EQL's Quality Enhancement Rating which will, in turn, contribute towards future quality assurance activity. Further detail on how the Quality Enhancement Rating is calculated can be found on the SQA Accreditation website.
<http://www.sqa.org.uk/sqa/42387.2733.html>

2 Detail of Audit Issues and Recommendations

The following sections detail Issues recorded and Recommendations noted against SQA Accreditation's regulatory requirements.

2.1 Issues

Regulatory Principle 1. The awarding body shall have clearly defined and effective governance arrangements.

As part of the *Equestrian Qualifications GB Ltd Operational Plan 2014* the awarding body completed a review and revision of governance and reporting structures, as well as policies, procedures and guidance statements to ensure that it continued to meet regulatory requirements across the UK.

As a result, a range of updated documentation was made available across both Quickr and the awarding body website. This included the awarding body's *Marketing and Communications Statement, April 2014, Pricing and Invoicing Policy, April 2014, Equity, Equal Opportunities and Diversity Policy, April 2014, Reasonable Adjustments, April 2014, Assessment Policy, April 2014, and Conflict of Interest Policy and Statement, April 2014.*

However, a review of the revised documentation indicated that there was an inconsistent approach to referencing SQA Accreditation and its current regulatory requirements.

For example, the *Conflict of Interest Policy, April 2014*, and the *Assessment Policy, April 2014*, both clearly specify the relevant Condition from Ofqual's *General Conditions of Recognition* that the policy has been designed to meet. No comparable reference has been provided for SQA Accreditation's *Regulatory Principles (2014)*.

The former policy does make a generic reference to an annual review designed to ensure that it remains 'compliant with Ofqual's *General Conditions of Recognition* and SQA's *Regulatory Principles*' but a similar statement does not exist within the latter policy. However, to confuse things further, the associated Conflict of Interest Management Statement, April 2014, again contains generic references to SQA, as well as SVQs and the SCQF.

Therefore, the Audit Team concluded that the range of revised policies, procedures and guidance documentation had been written primarily with Ofqual in mind without equivalent thought being given to other regulatory requirements. Although, a number of references to SQA Accreditation exist they are often generic (i.e. SQA), not applied consistently across the documentation and do not indicate a detailed knowledge of SQA Accreditation's current regulatory requirements.

This has been recorded as **Issue 1**.

Regulatory Principle 14. The awarding body and its providers shall ensure that it has safeguards to prevent and manage cases of malpractice and maladministration.

A review of EQL's *Maladministration and Malpractice Policy, April 2014*, and *Maladministration and Malpractice Procedure, April 2014*, indicates a potential for inconsistency regarding the need to inform SQA Accreditation of any suspected cases of malpractice or maladministration.

The policy itself does not contain any such reference regarding suspected cases, only containing a statement to the effect that 'EQL will, if necessary notify Ofqual and/or relevant regulatory bodies'. The remainder of the policy focuses upon the responsibilities of centres delivering EQL qualifications, as well as providing examples of both maladministration and malpractice.

The associated procedure, noting that it should be read in conjunction with the policy itself, contains a number of actions specific to the awarding body. For example, it clearly states that 'EQL has a responsibility to the regulatory authorities to ensure that all investigations are carried out rigorously and effectively'.

It also states that 'all suspected cases of maladministration and malpractice will be examined promptly by EQL to establish if malpractice or maladministration has occurred and will take reasonable steps to prevent any adverse effect from occurring as defined by the regulator Ofqual/SQA'.

Lastly, there is an assertion that 'where applicable, the EQL Manager will inform the appropriate regulatory authorities if EQL suspects there has been an incident of malpractice or maladministration, which could invalidate the award of a qualification or if it could affect another Awarding Organisation'.

The auditors would contend that all of the above represents too many caveats to the process of notifying SQA Accreditation of suspected malpractice upon notification.

This has been recorded as **Issue 2**.

Regulatory Principle 15. The awarding body and its providers shall have effective, reliable and secure systems for the registration and certification of learners.

And

Regulatory Principles Directive – RPDIR 5 Logos and certificate requirements for SQA accredited qualifications

A review of EQL certificates identified that the Unit certificate template contains the heading 'SCQF Certificate of Unit Credit'.

The auditors are of the opinion that the use of such a heading within the Unit certificate template misrepresents the role of the SCQF by encouraging stakeholders to believe that it is a type of qualification akin to the status afforded qualifications that reside within the QCF.

Instead, the SCQF is an overarching framework which promotes lifelong learning in Scotland and encompasses all types of currently available qualifications subject to being SCQF credit rated.

EQL representatives advised that this particular convention was approved by SQA Accreditation in August 2012 and evidence was available on Quickr to support this assertion.

However, in December 2012, *SQA Accreditation Regulatory Principles Directive RPDIR – 3 Logos and certificate requirements for SQA accredited qualifications* was introduced and provided guidelines on what was deemed acceptable for inclusion in a Unit certificate.

Although an optional requirement, this Directive suggests a more non-qualification specific approach providing the example of 'Certificate of Unit Credit'. This was previously used by EQL in an earlier iteration of the Unit certificate template.

This has been recorded as **Issue 3**.

2.2 Recommendations

Regulatory Principle 4. The awarding body shall continually review the effectiveness of its business services, systems, policies and processes.

EQL's *Conflict of Interest Policy, April 2014*, makes reference to a Risk Management Group.

Specifically, the policy notes the fact that the 'EQL Manager is responsible for reporting all actual or potential conflict of interest, including those identified by the Risk Management Group when dealing with specific audits or investigations, to the Board'.

The policy also noted that the Risk Management Group will have a role in conducting investigations around potential or actual conflict of interest issues.

Other than the above, further pre-audit checks of documentation relating to the wider management of risk could not determine if the group had a remit beyond that specified within the *Conflict of Interest Policy, April 2014*.

During the audit, the awarding body representatives provided a copy of an EQL document entitled *Risk Management, March 2014*, which outlined the risk management process. This document has been reviewed as part of the *Equestrian Qualifications GB Ltd Operational Plan 2014* but has yet to be formally ratified by EQL at Director level. However, this document also fails to define the role of the Risk management Group.

The auditors were also advised during the audit that membership of the Risk Management Group includes representation from the Human Resources, Finance and Marketing Departments of The British Horse Society (BHS). However, the lack of documented information on the group made it difficult for the Audit Team to make a judgment on the how this level of BHS input to the group might influence any decision making on EQL activity.

With all of the above in mind, EQL may wish to consider creating terms of reference for the Risk Management Group which includes the purpose of the group, its membership, timescales for operation and reporting structures. This may ensure that the group is fit for purpose and meets awarding body operational requirements.

This has been noted as **Recommendation 1**.

Regulatory Principle 5. The awarding body shall provide clear information on its procedures, products and services and ensure that they are accurate and appropriate to SQA accredited qualifications.

And

Regulatory Principle 13. The awarding body and its providers shall have clear, fair and equitable procedures to manage appeals.

On reviewing EQL's *Appeals and Complaints Policy, March 2014*, the auditors noted considerable variation in the cost of submitting an appeal against EQL procedural decisions.

The policy notes that potential or recognised centres will be required to pay an administrative charge of £100. However, learners or relevant third parties will only be required to pay an administrative charge of £20 for a similar appeal.

Given the fact that the process of appeal is identical in both cases, the Audit Team could not identify the reason for such a variation in charges.

Should EQL believe that there is a need for such an approach to administrative charges for appeals, it may wish to revise the *Appeals and Complaints Policy, March 2014*, to ensure that a clear rationale is available to stakeholders.

This has been noted as **Recommendation 2**.

Regulatory Principle 11. The awarding body shall ensure that its qualifications and their assessment are inclusive and accessible to learners.

The EQL document *Reasonable Adjustments, April 2014*, states that the approved centre has responsibility for processing and approving requests for reasonable adjustments to the assessment process. Subsequently, the centre's processes and procedures for the implementation of any reasonable adjustments are monitored by the appointed External Verifier.

With the emphasis on a post-activity review, the Audit Team would contend that there is the potential for the use of inappropriate reasonable adjustments at centre level.

EQL may wish to consider advising centres to consult with their appointed External Verifier before confirming with a learner that any request for a reasonable adjustment to the assessment process has been approved.

This has been noted as **Recommendation 3**.

Regulatory Principle 12. The awarding body and its providers shall have open and transparent systems to manage complaints.

EQL's *Appeals and Complaints Policy, March 2014*, specifies a procedure for making a complaint. Although, the procedure outlines each stage of making a complaint it does not allocate a specific timescale for each step taken. The exception being the 10 working days allocated to notifying parties in the event that a complaint is not upheld.

EQL may wish to revise the *Appeals and Complaints Policy, March 2014*, to ensure that there are clear and measurable timescales allocated to all stages of the process of making a complaint.

This has been noted as **Recommendation 4**.

Regulatory Principle 15. The awarding body and its providers shall have effective, reliable and secure systems for the registration and certification of learners.

On reviewing the unit certificate template, the Audit Team noted that the convention for recording SCQF levels was the inclusion of a clause 'at SCQF Level' at the end of each accredited unit title. For example:

Care for horses after exercise at SCQF level 5

The Audit Team felt that this may result in an assumption by stakeholders that the full accredited unit title includes a reference to the SCQF level, mirroring the format that can be used for full awards.

EQL representatives advised that the current convention was approved by SQA Accreditation in August 2012 and evidence was available on Quickr to support this assertion.

However, in December 2012, SQA Accreditation *Regulatory Principles Directive RPDIR – 3 Logos and certificate requirements for SQA accredited qualifications* was introduced and provided guidelines on what was deemed an appropriate way of recording both SCQF credit and level for individual units.

Awarding body representatives advised that their database system is currently unable to accommodate the recommended method for recording unit titles and associated SCQF credit and levels as stated in the relevant Regulatory Principles Directive. However, they also noted that a planned database upgrade will hopefully present an opportunity to remedy the situation.

In the meantime, EQL may wish to consider amendments to the current method of recording unit titles and the associated SCQF credit and levels to ensure that no confusion arises in respect of any SQA accredited unit title.

This has been noted as **Recommendation 5**.

3 Acceptance of Audit Findings

For and on behalf of Equestrian Qualifications
GB Limited:

For and on behalf of SQA Accreditation:

Signature

Signature

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Designation

Designation

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Date

Date

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