



# Audit Meeting Report

**Awarding body:** Safety Training Awards (STA)  
**Date of audit:** 2 March 2011

## **Note:**

Whilst confidential or commercially sensitive information gathered during all SQA Accreditation monitoring activities is treated in the strictest confidence:

- ◆ The findings of this report will be presented to the Scottish Qualifications Authority's (SQA) Accreditation Committee and made available to colleagues from the Department for Children, Education, Lifelong Learning and Skills (DCELLS), the Council for the Curriculum, Examinations and Assessment (CCEA) and the Office of Qualifications and Examinations Regulation (Ofqual) with a view to informing future accreditation and re-accreditation submissions submitted by the awarding body.
- ◆ The report will be published on SQA Accreditation's website.

Please note however, that SQA Accreditation monitoring activity is conducted on a sampling basis. As a consequence, not all aspects of an awarding body's performance in quality assurance, contract compliance, implementation, awarding of certificates and fee arrangements have been considered in this report to the same depth.

# Contents

Executive summary .....	1
Statement of Excellence 1: Governance and leadership .....	2
Statement of Excellence 2: Quality enhancement .....	4
Statement of Excellence 3: Administration and support.....	5
Statement of Excellence 4: Qualification development and design.....	11
Statement of Excellence 5: Assessment and verification.....	13
Conclusion .....	16
Appendices .....	17
Appendix 1: Current year non-compliances, observations and action plan .....	18
Appendix 2: Risk rating of non-compliances.....	23
Appendix 3: Table of awards.....	24
Appendix 5: List of documents reviewed pre-audit and post-audit.....	26
Appendix 6: Signatures of agreement to action plan.....	28



## **Executive summary**

### **Purpose and scope of audit**

This was the second audit of STA since it was approved as an awarding body by SQA Accreditation. The audit was designed to review, evaluate and document STA's strategies, policies and processes, and ensure compliance with SQA Accreditation's *Awarding Body Criteria* (2007).

As this was a full audit of STA, all criteria were included within the scope of the audit.

### **Background**

STA was approved by SQA Accreditation as an awarding body during 2009. STA is a nationally-recognised awarding body dealing with qualifications spanning the following industries: life guarding, poolside helpers, swimming teaching and emergency first aid at work.

STA was formed in 1932 and is a company limited by guarantee. The awarding body is a registered charity in England and Scotland. STA is registered with the Criminal Records Bureau (CRB) as a registered body.

### **Audit outcome**

As a result of the audit and post-audit activities, four non-compliances have been recorded and ten observations noted.

## Statement of Excellence 1: Governance and leadership

'The awarding body has effective governance, leadership and management, which supports the delivery of SQA accredited qualifications. The awarding body's strategic aims, objectives and policies are appropriate and are understood by all who refer to them.'

### Key Goal 1: The awarding body has robust and transparent governance arrangements.

#### Findings

The awarding body is governed by a Board of Trustees. The Board is tasked with overseeing the organisation's business objectives. The Board is supported by the Education Committee. The Education Committee is tasked with the supervision of all education matters, including courses and awards.

STA's business in Scotland is overseen by the Scottish Council, which was formed in 2008. The Scottish Council has representation on the Education Committee. The Scottish Council has its own website, produces an electronic magazine at irregular intervals and holds an annual conference.

Terms of reference were available for the Board of Trustees and the Education Committee but no terms of reference were available for the Scottish Council. **This has been noted as an observation; observation 1 refers.**

STA publishes an annual report. The annual report is published on its website and includes a statement of financial activities.

#### Conclusion

The evidence available confirms that STA continues to meet the requirements of the criteria under Key Goal 1. **No non-compliances have been recorded and one observation noted; observation 1 refers.**

### Key Goal 2: The awarding body's leadership is effective.

#### Findings

All STA employees are subject to an annual performance review. As part of this process, STA encourages staff, at all levels, to take part in continuous professional development.

During the course of the audit, the awarding body's contingency planning was discussed. The discussion concentrated on the roles of senior management and what actions would be taken by the awarding body if a member of senior management was indisposed. While the awarding body has an informal process in place for such a contingency there is no formal process. **This has been noted as an observation; observation 2 refers.**

## Conclusion

The evidence available confirms that STA continues to meet the requirements of the criteria under Key Goal 2. **No non-compliances have been recorded and one observation noted; observation 2 refers.**

## Key Goal 3: The awarding body has an effective business planning process.

### Findings

STA's strategic planning cycle is based on a five year rolling plan; the planning cycle results in a written plan. The strategic aims and objectives listed within the plan are set by the Chief Executive and the Board of Trustees. The Chief Executive reports to the Board of Trustees formally once a quarter on the plans progress. It was stated that there were also informal updates to the Board monthly from the Chief Executive.

The Lead Auditor reviewed the five year strategic plan. The plan was broken down into three sections:

- ◆ Section 1 — STA constitutional and organisational review
- ◆ Section 2 — STA provisional five year plan, 2009 to 2014
- ◆ Section 3 — STA draft strategic plan

The Audit Team was informed that the plan was last reviewed 18 months ago. This statement and the use of the words 'provisional' and 'draft' in the section titles would suggest the plan has not been formally reviewed since it was written. **This has been recorded as a non-compliance; non-compliance 1 refers.**

The plan listed a number of objectives (five year delivery objectives — draft). The objectives did not state who was responsible for monitoring them or, in most cases, state a date for achievement. **This has been noted as an observation; observation 3 refers.**

STA's Marketing Campaign 2010-2011 was forwarded to the Lead Auditor post audit. The Lead Auditor was therefore unable to discuss the campaign with members of STA nor cross reference it to other activities. It is recommended that a full review of marketing activities within the awarding body form part of the next scheduled audit.

## Conclusion

The evidence available confirms that STA does not meet the criteria. **One non-compliance has been recorded and one observation noted; non-compliance 1 and observation 3 refers.**

## Statement of Excellence 2: Quality enhancement

'The awarding body has developed and implemented a robust quality framework that ensures a quality product is delivered to the candidate. The awarding body and its staff are committed to a quality culture of continuous improvement through review and evaluation.'

### Key Goal 4: The awarding body has a culture of continuous quality improvement.

#### Findings

Prior to the audit, a copy of STA's *Procedures Manual* was sent to the Lead Auditor. It was noted that this file was last updated in April 2008.

STA operates an internal audit process. The review of the process' associated files show that the last batch of internal audit reports had not been signed or dated by the internal auditor, nor was a schedule of audit available. **This has been noted as an observation; observation 4 refers.**

STA gathers data from a variety of sources. While the awarding body gathers data it does not always evaluate it, for example data held on equal opportunities is not evaluated. Furthermore, the awarding body has set a number of key performance indicators, for example it allows 28 days to process a candidate's certificate. There is no formal review of such key performance indicators to ensure compliance. **This has been recorded as a non-compliance; non-compliance 2 refers.**

#### Conclusion

The evidence available confirms that STA does not meet the criteria. **One non-compliance has been recorded and one observation noted; non-compliance 2 and observation 4 refers.**

## Statement of Excellence 3: Administration and support

'The awarding body's administrative and support arrangements have been designed to reduce bureaucracy, are responsive to stakeholders' needs and are cost effective. The awarding body continually reviews its qualification provision to ensure it has, and deploys, sufficient resources for the administration and support of its qualification provision.'

**Key Goal 5: The awarding body has robust systems in place for the management of the service it offers.**

### Findings

It is the responsibility of the Education Committee to review STA's policies, processes and linked key performance indicators. STA's management systems include ISO (9001:2000), internal audit and self-assessment.

As stated, STA is ISO (9001:2000) accredited. The awarding body's British Standards Institute (BSI) file was presented as evidence of compliance with this standard. It was noted, however, that the file was out of date and contained a number of superseded policies.

STA has developed written job descriptions for employees; however, there are no work instructions to support these documents. **This has been noted as an observation; observation 5 refers.**

### Conclusion

The evidence available confirms that STA continues to meet the requirements of the criteria under Key Goal 5. **No non-compliances have been recorded and one observation noted; observation 5 refers.**

**Key Goal 6: The awarding body has an effective communications strategy that supports its awarding body activities.**

### Findings

STA's documentation tends to be Anglo-centric. During the course of the audit, a number of documents were noted that referred to Ofqual where they should have referred to SQA Accreditation and Ofqual. As an example, the Education Committee's terms of reference contain references to the Qualifications Curriculum Authority (QCA) and no reference to SQA Accreditation. **This has been recorded as a non-compliance; non-compliance 3 refers.**

Prior to the audit, the Audit Team reviewed two websites associated with STA.

The website <http://www.stascotland.co.uk> contains an SQA Accreditation logo on the homepage which is both inaccurate and superfluous. The logo is inaccurate as it has not been authorised for use by SQA Accreditation and should be removed at the earliest opportunity. Its presence on the website is also superfluous as the SQA Accreditation approved awarding body logo is also present on the homepage. **This has been recorded as a non-compliance, non-compliance 4 refers.**

The website <http://www.sta.co.uk> contains the following statement under the heading of 'Key facts about the STA which is found in the 'About the STA' section of the website.':

*'Developed a range of Swimming Pool and Spa Plant qualifications which were the first qualifications of their type to be accredited with the Scottish Qualifications Authority (SQA) and on the National Qualifications Framework (NQF) soon to become the Qualifications Credit Framework (QCF).'*

The above information must be revised to accurately reflect the relationship between SQA accredited qualifications and the NQF and QCF, as well as including relevant references to the Scottish Credit and Qualifications Framework (SCQF) if appropriate. **This has been recorded as a non-compliance, non-compliance 4 refers.**

### **Conclusion**

The evidence available confirms that STA does not meet the criteria. **Two non-compliances have been recorded and no observations noted; non-compliance 3 and 4 refers.**

**Key Goal 7: The awarding body has systems and processes for the approval of centres.**

### **Findings**

STA does not approve centres; rather it approves tutors; see Key Goals 18 and 19.

### **Conclusion**

This Key Goal is not applicable to the current portfolio of qualifications offered by this awarding body.

**Key Goal 8: The awarding body has a customer service statement and identified service levels.****Findings**

STA has a published customer service statement. The customer service statement requires to be reviewed to ensure consistency of advice in respect of complaints and appeals. With respect to candidate complaints, the statement indicates that the candidate should complete the appropriate form which can be downloaded from the website. However, STA's *Awarding Body Complaints Procedure* (2010, version 2) does not identify any such form only stating that a complaint must be submitted 'in writing'.

**This has been noted as an observation; observation 6 refers.**

**Conclusion**

The evidence available confirms that STA continues to meet the requirements of the criteria under Key Goal 8. **No non-compliances have been recorded and one observation noted; observation 6 refers.**

**Key Goal 9: The awarding body has open and transparent processes for complaints and appeals.****Findings**

Prior to the audit, the Audit Team were able to review STA's *Awarding Body Complaints Procedure* (2010, version 2) and its *Enquiries about Results and Appeals Procedure* (2010) as published on the organisation's website on 25 February 2011.

Both procedures contained specified timescales which were also reflected within the associated customer service statement. The procedures also stated that a stakeholder could contact the Regulatory Authorities if required; for example if dissatisfied with the outcome of an appeal or complaint. Whilst commending the awarding body for these inclusions, it may wish to provide full contact details for the Regulatory Authorities. **This has been noted as an observation; observation 7 refers.**

**Conclusion**

The evidence available confirms that STA continues to meet the requirements of the criteria under Key Goal 9. **No non-compliances have been recorded and one observation noted; observation 7 refers.**

**Key Goal 10: The awarding body has an effective system for the registration and certification of candidates.****Findings**

STA operates an online registration and certification system. All relevant forms and guidance are available either on CD-ROM or can be downloaded from the awarding body's website. The Audit Team were given a demonstration of the awarding body's registration and certification processes during the course of the audit.

STA provided the Audit Team with copies of certificates prior to the audit taking place. These were reviewed at SQA Accreditation's offices.

Accreditation agreement E012 is between Safety Training Awards and SQA Accreditation; the agreement lists what must be printed on the certificate. The agreement requires that the name of the organisation(s) being the awarding body, that is Safety Training Awards, be printed on the certificate. It was noted, however, that the name of the awarding body printed on the certificate is Safety Training Awards Scotland. **This has been recorded as a non-compliance, non-compliance 4 refers.**

The SQA approved awarding body logo printed on the sample certificates reviewed by the Audit Team does not meet the required size; the logo should be a minimum of 35mm in height with a 10mm exclusion zone. **This has been recorded as a non-compliance, non-compliance 4 refers.**

### **Conclusion**

The evidence available confirms that STA continues to meet the requirements of the criteria under Key Goal 10. **One non-compliance has been recorded and no observations noted; non-compliance 4 refers.**

### **Key Goal 11: The awarding body has implemented a diversity and equality strategy.**

#### **Findings**

STA requires each Tutor to have, and publish, its own equality and diversity policy. It is the responsibility of the Moderator Tutor to monitor equality and diversity during moderation visits.

The review and update of the awarding body's equal opportunities policy was discussed with the awarding body's representatives. The Audit Team sought confirmation that the policy had been reviewed in line with the Equality Act 2010: it was stated this had not been done. **This has been noted as an observation; observation 8 refers.**

### **Conclusion**

The evidence available confirms that STA continues to meet the requirements of the criteria under Key Goal 11. **No non-compliances have been recorded and one observation noted; observation 8 refers.**

### **Key Goal 12: The awarding body has a policy and procedure for malpractice and/or maladministration.**

#### **Findings**

STA has a policy for malpractice and maladministration. STA's representatives stated there had been no change to this policy since the previous audit. The Audit Team reviewed STA's policy for malpractice/maladministration during the course of the audit.

STA stated that there had been no reported cases of malpractice and/or maladministration since the previous audit.

**Conclusion:**

The evidence available confirms that STA continues to meet the requirements of the criteria under Key Goal 12. No non-compliances have been recorded and no observations noted.

**Key Goal 13: The awarding body provides clear written guidance for awarding body representatives and prospective or approved centres and their staff.****Findings**

STA has policies and processes in place for the development and issuing of guidance materials. STA publishes policy statements on its website and within various manuals; the manuals are then distributed to tutors, candidates, etc as necessary.

The Audit Team reviewed a sample of STA's manuals pre-audit. The manuals were written in plain English, detailed and easy to understand and follow.

As stated previously, some manuals, for instance STA's *Tutor Manual — Foundation Unit* (17 February 2009, version 1.3), include one or more of STA's policy statements, such as the awarding body's equal opportunity policy. The awarding body's policies are subject to revision due to changes in law or to awarding body practices.

The inclusion of policies within manuals makes it difficult for the awarding body to ensure policies are updated when required and there is the potential for out of date policies to be in circulation and use. **This has been noted as an observation; observation 9 refers.**

**Conclusion**

The evidence available confirms that STA continues to meet the requirements of the criteria under Key Goal 13. **No non-compliances have been recorded and one observation noted; observation 9 refers.**

**Key Goal 14: The awarding body has a record retention policy that takes into account any regulatory or statutory requirements.****Findings**

STA has issued guidance to its approved tutors on the retention of candidate's details. Tutors are required to retain candidate details for a minimum of three years; it is the responsibility of the Moderator Tutor to check this area during the moderation visit. STA, as the awarding body, retains records for a minimum of five years.

**Conclusion**

The evidence available confirms that STA continues to meet the requirements of the criteria under Key Goal 14. No non-compliances have been recorded and no observations noted.

## **Statement of Excellence 4: Qualification development and design**

'The awarding body has demonstrated that it has appropriate experience and ability to design, develop and deliver qualifications. The awarding body assessment methods are rigorous but have sufficient flexibility to ensure that their requirements can be met cost-effectively and in a variety of different circumstances. Copies of the awarding body's assessment methodology and guidance are made available to all those who may wish to use them'.

**Key Goal 15: The qualification and associated structure has been designed to ensure it is appropriate and meets the needs of the occupational sector.**

### **Findings**

STA has not submitted any new qualifications for accreditation since it sought approval as an awarding body.

### **Conclusion**

The evidence available confirms that STA continues to meet the requirements of the criteria under Key Goal 15. No non-compliances have been recorded and no observations noted.

**Key Goal 16: The awarding body has designed an assessment methodology that is fit for purpose.**

### **Findings**

There has been no change to the STA's assessment methodologies since the time of accreditation.

### **Conclusion**

The evidence available confirms that STA continues to meet the requirements of the criteria under Key Goal 16. No non-compliances have been recorded and no observations noted.

**Key Goal 17: The awarding body submits timely and detailed qualification submissions.**

### **Findings**

STA has not submitted any qualifications for accreditation since it sought approval as an awarding body.

### **Conclusion**

The evidence available confirms that STA continues to meet the requirements of the criteria under Key Goal 17. No non-compliances have been recorded and no observations noted.

**Key Goal 18: The awarding body's assessment methods produce results that are authentic, reliable and consistent.****Findings**

Each of STA's qualifications has an assessment specification. These are included in the relevant manuals and tutor guides and can also be accessed via the awarding body's website. Assessment is through observation, review of completed worksheets, oral questioning and practical and written examinations. Evidence to show competence is collated within a portfolio which is subject to moderation.

Standardisation and currency of tutors is addressed through STA's ongoing re-validation process. Tutors are approved for three or five years (course dependent) after which they must seek re-validation. Each tutor is required to attend training updates and is subject to moderation. Tutors also make use of STA's online tutor community to raise issues with, and seek feedback from, their peers and STA.

Tutors are responsible for maintaining a record of continuous professional development activity. Continuous professional development records are subject to scrutiny by the Moderating Tutor and the National Tutor.

**Conclusion**

The evidence available confirms that STA continues to meet the requirements of the criteria under Key Goal 18. No non-compliances have been recorded and no observations noted.

## Statement of Excellence 5: Assessment and verification

'The awarding body's methodology for assessment and verification is rigorous and has been designed to ensure that only those candidates who have shown competence are awarded a certificate. The awarding body only deploys personnel that are qualified and competent.'

**Key Goal 19: The awarding body ensures its approved centres have access to appropriately qualified personnel for the range of qualifications they are approved to deliver.**

### Findings

The Audit Team were provided with an overview of the awarding body's process for approving tutors for its portfolio of SQA accredited qualifications.

STA operates a three-tier tutor structure:

- ◆ STA Tutor
- ◆ Moderator Tutor
- ◆ National Tutor

Potential tutors are identified through a number of different sources including direct application or identification by other sector representatives. The potential tutor must complete an application form, *Becoming an STA Tutor by APL*, provide evidence of qualifications held, as well as evidence of an appropriate level of experience in the discipline. The awarding body expects to see copies of certificates and confirmation of experience which can be in the form of a witness statement from a current or recent employer.

The Audit Team were provided with a sample of tutor files across the suite of qualifications. It was noted that there was considerable variance in the amount and range of information contained within the files. In all cases, the Auditor was able to see invoices pertaining to moderation activity alongside completed moderation forms. However, there was considerable variation in respect of the approval documentation available from file to file. **This has been noted as an observation; observation 10 refers.**

### Conclusion

The evidence available confirms that STA continues to meet the requirements of the criteria under Key Goal 19. No non-compliances have been recorded and one observation noted. **No non-compliances have been recorded and one observation noted; observation 10 refers.**

**Key Goal 20: The awarding body's systems and processes for the appointment, training, registration, deployment and monitoring of External Verifiers are effective and robust.**

### **Findings**

STA does not appoint External Verifiers; rather it appoints Moderator Tutors and National Tutors who carry out a broadly similar function.

The role of the Moderator Tutor is to monitor the standards of the tutor/examiner. This entails him/her acting as a mentor to the tutor/examiner and assisting to identify training and development needs. The National Tutor moderates the standards of Moderator Tutors. He/she will run moderation, update and training courses for Moderator Tutors and tutors/examiners. Similar to the Moderator Tutor, the National Tutor has a mentoring and development role.

All Moderator Tutors, National Tutors and tutor/examiners are bound by STA's *Code of Ethics* and must adhere to the special regulations relating to tutors as set by STA. Failure to comply with the regulations and *Code of Ethics* may result in the suspension of the individual concerned.

### **Conclusion**

The evidence available confirms that STA continues to meet the requirements of the criteria under Key Goal 20. No non-compliances have been recorded and no observations noted.

**Key Goal 21: The awarding body has systems and processes for monitoring the quality and consistency of assessment provided at any location. These systems must ensure that assessment is uniformly systematic, valid and to the defined standard.**

### **Findings**

STA has policies and processes for monitoring the quality and consistency of assessment at all of its approved locations.

STA operates a system of peer review. The Moderator Tutor is expected to review each tutor/examiner on a regular basis; at least once every three years. Where an individual operates as a tutor and as an examiner, he/she is subject to two reviews.

The tutor/examiner is graded at the end of the review. If the tutor/examiner falls below the expected standard, an action plan will be put in place. The Audit Team viewed a sample of the reports sent to STA following moderation of tutors/examiners.

The peer review lasts for approximately three hours and results in a written report. The report is signed by the Moderator Tutor and the tutor/examiner.

**Conclusion**

The evidence available confirms that STA continues to meet the requirements of the criteria under Key Goal 21. No non-compliances have been recorded and no observations noted.

## Conclusion

This was the second audit of STA and the Audit Team was provided with full access to the awarding body premises, staff and documentation.

STA has systems in place, both formal and informal, for the review of policies, processes and documents. A number of non-compliances and observations have been documented within the body of this report which relate to this area. It is the opinion of the Audit Team that a review and formalisation of these systems would strengthen STA's systems and reduce the likelihood of non-compliances being recorded against this area in the future.

In a similar vein, a number of observations were noted. It is recommended that these are considered by STA and actioned where appropriate.

STA's Marketing Campaign 2010-2011 was forwarded to the Lead Auditor post audit. The Lead Auditor was therefore unable to discuss the campaign with members of STA nor cross reference it to other activities. It is recommended that a full review of marketing activities within the awarding body form part of the next scheduled audit.

The Auditors would like to thank STA for their assistance during the course of the audit. The Auditees open and frank discussions and willingness to provide data was appreciated.

# Appendices

## Appendix 1: Current year non-compliances, observations and action plan

### Non-compliances

A non-compliance will be recorded where the Lead Accreditation Auditor finds evidence that the awarding body fails to meet any of the criteria contained in SQA Accreditation's *Awarding Body Criteria (2007)* or any of the conditions attached to qualifications accredited by SQA Accreditation at the time of accreditation. When recording any non-compliance, the Lead Accreditation Auditor will agree the action to be taken by the awarding body and a timetable for resolving the issue.

Non-compliance recorded	Agreed action and date	Key Goal/criterion	Risk rating
1 STA has not reviewed its five year strategic plan within the last 12 months.	STA must review and update its strategic plan.  A copy of the updated strategic plan must be sent to SQA Accreditation no later than 31 August 2011. <b>Ext 31 October 2011</b>	Key Goal 3 refers	3
2 STA does not formally evaluate data collected and key performance indicators.	STA must review its process for acquiring and analysing data. The awarding body must ensure that an annual review takes place, the outcomes of which are documented and available on request by the Regulatory Authorities.  A copy of the review and associated outcomes must be sent to SQA Accreditation no later than 31 August 2011. <b>Ext 31 October 2011</b>	Key Goal 4 refers	3
3 STA's documentation tends to be Anglo-centric. During the course of the audit, a number of documents were noted that referred to Ofqual (or QCA) where they should have referred to SQA Accreditation and Ofqual.	STA must revise its documentation to ensure they refer to both regulators.  STA must confirm, in writing, to SQA Accreditation that its documentation and website have been updated. Confirmation must	Key Goal 6 refers	3

Non-compliance recorded	Agreed action and date	Key Goal/criterion	Risk rating
	be sent to SQA Accreditation no later than 31 August 2011. <b>CLOSED OUT 25.8.11</b>		
<p>4 STA has a superfluous and inaccurate logo on its website.</p> <p>The website <a href="http://www.sta.co.uk">http://www.sta.co.uk</a> contains information that does not accurately reflect the relationship between the National Qualifications Framework (NQF) soon to become the Qualifications Credit Framework (QCF).</p> <p>Accreditation agreement E012 is between Safety Training Awards and SQA Accreditation; the agreement lists what must be printed on the certificate. The name of the awarding body printed on the certificate is Safety Training Awards Scotland and not Safety Training Awards.</p> <p>The SQA approved awarding body logo printed on the sample certificates reviewed by the Audit Team does not meet the required size.</p>	<p>STA must review its:</p> <p>website and:</p> <ul style="list-style-type: none"> <li>◆ remove the superfluous logo</li> <li>◆ ensure it accurately reflects the relationship between SQA accredited qualifications and the NQF and QCF</li> <li>◆ includes relevant references to the Scottish Credit and Qualifications Framework (SCQF) where appropriate</li> </ul> <p>certificates and ensure:</p> <ul style="list-style-type: none"> <li>◆ they meet the criteria listed within Accreditation agreement E012</li> <li>◆ the logo printed on the certificates is of the correct size — the logo should be a minimum of 35mm in height with a 10mm exclusion zone</li> </ul> <p>STA must confirm, in writing, to SQA Accreditation that its website and certificates have been reviewed and updated as required. Confirmation must be sent to SQA Accreditation no later than 31 August 2011.</p> <p><b>CLOSED OUT 25.8.11</b></p>	Key Goal 6 and 10 refers	3

Non-compliance recorded	Agreed action and date	Key Goal/criterion	Risk rating

## Observations

An observation will be noted to ensure that any recommendations agreed during the audit are recorded for future reference. As observations are recorded for awarding body consideration only, it is not necessary to agree a timescale to resolve the observation in the awarding body action plan.

Once agreed, the action plan is signed by representatives from both SQA Accreditation and the awarding body, and will inform the agenda for the next audit meeting.

Observations noted	Action recommended	Key Goal/criterion
1 There are no terms of reference for the Scottish Council.	STA should develop terms of reference for the Scottish Council.	Key Goal 1 refers
2 STA has no formal contingency plans in place for the loss of a senior management member.	STA should develop a contingency plan that minimises risk and ensures the continuity of the key operations of the organisation.	Key Goal 2 refers
3 Objectives within STA's strategic plan do not follow industry best practice.	STA may wish to review its strategic plan to ensure documented objectives follow industry best practice. In particular, the awarding body should consider the use of SMART methodology.	Key Goal 3 refers
4 STA's last internal audit reports had not been signed or dated by the internal auditor, nor was a schedule of audit available.	STA should review its procedures for internal audit to ensure an annual audit schedule is developed and that auditors sign and date reports on completion.	Key Goal 4 refers
5 While STA has written job descriptions there are no work instructions to support these.	STA may wish to consider the development of work instructions.	Key Goal 5 refers
6 STA's customer service statement provides a summary of the awarding body's complaints and appeals process. The summary does not accurately reflect the complaints and appeals process.	STA should review its customer service statement to ensure it acutely reflects the awarding body's complaints and appeals process.	Key Goal 8 refers

Observations noted	Action recommended	Key Goal/criterion
7 STA's complaint and enquiries procedures state that a stakeholder may contact the Regulatory Authorities to progress a complaint or enquiry. The procedures do not, however, list the contact details of the Regulatory Authorities.	STA may wish to update its complaint and enquiries procedures to list the contact details of the Regulatory Authorities.	Key Goal 9 refers
8 STA's equality and diversity policy has not been reviewed against the Equality Act 2010.	STA should review its equality and diversity policy against the Equality Act 2010.	Key Goal 11 refers
9 The Audit Team reviewed a sample of STA's manuals. Some manuals, for instance STA's <i>Tutor Manual — Foundation Unit</i> (17 February 2009, version 1.3), include one or more of STA's policy statements; such as the awarding body's equality and diversity policy.	STA may wish to review its strategy of including policies within printed manuals. Not only does this increase cost to the awarding body but also the inclusion of policies within manuals makes it difficult to ensure policies are updated when required. It also increases the potential risk of out of date policies to be in circulation and use.	Key Goal 13 refers
10 The Audit Team were provided with a sample of tutor files for review by STA. It was noted that there was considerable variance in the amount and range of information contained within the files.	STA should consider the use of a checklist to aid file standardisation.	Key Goal 19 refers

## Appendix 2: Risk rating of non-compliances

SQA Accreditation assigns a risk rating to each non-compliance recorded as a result of an awarding body audit or through our centre monitoring activity. The table below illustrates how the rating for a non-compliance is assigned and identifies the possible impact of the non-compliance on qualifications and/or the learner.

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

### Explanation of ratings:

Rating of non-compliance	Risk	Impact of non-compliance
1	Very low	The non-compliance is 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 issue identified is unlikely to recur once resolved and no long lasting damage would be anticipated.
2	Low	The non-compliance is of low impact but of sufficient importance to merit intervention, with a low threat to the systems or processes 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.
3	Medium	The non-compliance could potentially damage the credibility of the qualification and/or be detrimental to the learner. There may be some impact to the systems or processes that support the qualification or the operational effectiveness of the awarding body.
4	High	The non-compliance could have a 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.
5	Very high	The non-compliance will have 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 non-compliance is considered on its own merit, taking account of the context in which it was identified.

## Appendix 3: Table of awards

### Current accredited qualifications offered

Title	Code	Level	Start date	Finish date
STA Certificate for the National Rescue Standard Pool Lifeguard	R041 04	N/A	26.08.2009	31.08.2011
STA Certificate for the National Rescue Standard Pool Attendant	R041 04	N/A	26.08.2009	31.08.2011
STA Award in Emergency First Aid at Work	R056 04	N/A	19.11.2009	31.12.2012
STA Certificate in Teaching Swimming — Full	R072 04	N/A	24.03.2010	31.03.2014
STA Foundation Certificate in Swimming Pool & Spa Water Treatment	R080 04	N/A	16.06.2010	3.07.2013
STA Certificate in Swimming Pool & Spa Water Treatment	R081 04	N/A	16.06.2010	31.07.2013
STA Certificate in Teaching Swimming — Beginners	R071 04	N/A	24.03.2010	31.03.2014

## **Appendix 4: 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's Accreditation Co-ordination Group finds evidence that the awarding body does not fully meet SQA's *Awarding Body Criteria* (2007).

A number of conditions were attached to STA's accredited qualifications at the time of approval. All conditions were closed out during the 2010 audit of the awarding body.

## Appendix 5: List of documents reviewed pre-audit and post-audit

Document title	Date of issue	Version number
Portfolio for Swimming Teachers Certificate (Beginners)		
Tutor Manual — Foundation Unit	February 2009	v1.3/17
STA Procedures Manual	1 February 2008	Uncontrolled
Enquires about Results and Appeals Procedure	2010	
Special consideration policy	Not dated	
Malpractice policy	Not dated	
STA Awarding Body Complaints Procedure	2010	v2
Reasonable adjustments policy	Not dated	
Customer service statement	Not dated	
Equal opportunities policy	Not dated	
Request for access arrangements form	Not dated	
Articles of association of the STA limited	2010	
Annual report	2009–2010	
STA course organiser application form	15 February 2011	Form 09
Course application form (2)	15 February 2011	v2
Course application form (1)	2010	v2
Enquires about results form	2010	
Special consideration policy	Not dated	
EFAW Certificate		002
NaRS PL Sample Cert	2009	
NaRS PA Sample Cert	2009	
NaRS PL Scotland		v8.5
NaRS PA Scotland (Course Manual)		v8.3
PPOF	2010	
PPOTO	2010	
PPOF Sample Certificate	2011	
PPOTO Sample Certificate	2011	

Document title	Date of issue	Version number
STCB Sample Certificate	2011	
STCF Sample Certificate	2011	
Best Value Seminar Agenda	2011	v1
Scottish Open Meeting Letter	2011	v1
STA Scotland E-zine	December 2010	
STA constitutional and organisational review	12 November 2008	
STA constitutional and organisational review — report of the subcommittee	11 December 2008	
STA Scottish Council — minutes of meeting	7 February 2011	
Education Committee terms of reference	Not dated	
Qualifications Development Team SWOT analysis	1 February 2011	
Education Standing Committee meeting	13 January 2011	
STA Trustees Code of Conduct	28 October 2010	
Development department meeting minutes	1 February 2011	
Marketing campaign	2010-2011	

## Appendix 6: Signatures of agreement to action plan

**For and on behalf of STA:**

**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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