



SQA Accreditation

Visit to Safety Training Awards (STA)

Awarding body centre report

12 November 2012 to 28 March 2013

Note

The findings of this report will be presented to the Scottish Qualifications Authority's (SQA) Accreditation Committee and made available to colleagues from the Welsh Government, 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 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

Section 1: Introduction	1
Section 2: Discussion	2
Section 3: Action plan	7
Appendix 1: Documents reviewed	10
Appendix 2: Risk rating of non-compliances	11

Section 1: Introduction

The purpose of the visit

SQA Accreditation conducts audits of all awarding bodies offering SQA accredited qualifications or Units. The audit methodology includes visits to a sample of the awarding body's approved centres or assessment sites. The aim of these visits is to:

- ◆ confirm that quality assurance arrangements are being conducted by the awarding body in accordance with its prescribed arrangements
- ◆ satisfy SQA Accreditation of the awarding body's performance against SQA Accreditation's *Awarding Body Criteria* (2007)
- ◆ all Key Goals were included within the scope of the centre monitoring activity
- ◆ confirm that the awarding body's quality assurance arrangements are being conducted in a consistent manner, within and between centres
- ◆ inform future monitoring activity for the awarding body

Centre visit dates

Four centres were involved in monitoring activity between 12 November 2012 and 28 March 2013.

Section 2: Discussion

Areas of good practice

The following areas of good practice were noted:

Provider 1 values the help and support provided by awarding body representatives and noted that queries are responded to in a timely manner.

The awarding body was also praised for the efficient manner in which it delivers course materials in support of qualification delivery. The provider also considered the associated pricing structure to be reasonable.

Provider 2 considers the structure and levelling of the awarding body's accredited qualifications to provide candidates with opportunities for progression.

Qualification materials are considered to be relevant and cost-effective.

Provider 4 considers the course materials to be of a particularly high standard. The provider also praised the level of support provided by awarding body staff in respect of organising courses and professional membership.

Areas of non-compliance

During the course of the centre monitoring visits it was found that the awarding body was not in compliance with the following Key Goals.

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

Specifically criteria:

The awarding body must:

- ◆ 6.2 The awarding body must communicate to its approved centres, External Verifiers and other key Stakeholders, any pertinent information in connection with SQA accredited qualifications and the awarding body activities.

- ◆ 6.4 Ensure that SQA Accrediting Body is granted access to the following from awarding body and approved centres: assessment locations, candidates, premises, meetings, documents, data, analysis and evaluations on request.

And

◆ 6.5 Support SQA Accrediting Body's monitoring activities.

SQA Accreditation experienced considerable difficulties in arranging a number of centre monitoring visits in support of the scheduled 2012–13 quality assurance cycle.

In particular, the Auditor was unable to gain access to Provider 3 despite several attempts to agree a suitable time and date between 23 October 2012 and 13 February 2013.

The provider in question initially displayed an unwillingness to agree a suitable time and venue for the visit when contacted by SQA Accreditation representatives, only doing so when contacted directly by the Auditor, showing a general disregard for the monitoring and reporting timescales that are designed to ensure that STA Awarding Body was provided with a timely report on provider activity.

There was also a failure to provide a guarantee of sufficient time to allow the Auditor to undertake a review of documentation in support of the delivery of SQA accredited provision.

Having finally agreed a date for the visit of 23 November 2012 the provider cancelled due to illness. SQA Accreditation accepts that such instances can occur and is willing to be flexible around the reorganisation of agreed dates to ensure that a provider is fully able to commit to centre monitoring activity. However, it does not look favourably upon providers being requested to provide alternative dates and failing to do so.

In this case, despite being asked to provide an indication of further suitable dates upon the provider's return to health, the Auditor was required to make further contact in January 2013 to establish an alternative date. Again, this proved to be a difficult task with the provider failing to commit to suggested dates for the visit

STA has recently devised an *STA Statement of Compliance with SQA Accreditation Regulatory Principles (2011)*, date 17 December 2012, which notes that the awarding body considers itself to be fully compliant with the principles as of the stated date and has no cause to believe that it will 'fail to comply with any of the *SQA Accreditation Regulatory Principles (2011)* during the period of 12 months immediately following' the date of the statement.

The Auditor's view is that further instances of a failure to gain access to providers for monitoring purposes would constitute a failure to comply with Principle 7.

SQA Accreditation takes a serious view of approved providers failing to grant access for the purposes of quality assuring systems and procedures in respect of SQA accredited qualifications and considers such actions to be a major risk to the integrity of the qualification and associated stakeholders.

Consequently, STA Awarding Body must reiterate to all approved providers the need to fully support the quality assurance activities of the Qualification Regulator, taking the appropriate action against those providers whose actions leave the awarding body in a non-compliant position in respect of either the *Awarding Body Criteria (2007)* or *SQA Accreditation's Regulatory Principles (2011)*. **Non-compliance 1 refers.**

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

At Provider 5, the Auditor found copies of completed examination papers. The copied examination papers had been marked, were signed by both candidate and examiner and included the initial decision on the candidate's competence.

The provider was not clear on why copies of completed examination papers were present within the files, noting that current practice involves the returning of all course paperwork to the Course Co-ordinator who is responsible for forwarding all relevant documentation pertaining to an examination to STA Awarding Body.

Clarification was sought from STA Awarding Body on the appropriateness of copying examination papers and it was confirmed that the *STA Tutor Manual Foundation Unit* notes that 'it is not permitted to keep, or take copies, of any examination papers'.

Given STA Awarding Body's use of a bank of questions to randomly generate examination papers, the Auditor is concerned that the presence of copied papers could be used to undermine the robustness of the external assessment process.

Therefore, the awarding body must take appropriate action to ensure that all providers are clear that the copying of examination papers is not acceptable, identifying providers who have done so to ascertain the reason why, as well as conducting the necessary checks to ensure that any examination activity associated with said providers has not been compromised by such activity. **Non-compliance 2 refers.**

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.

Specifically criterion:

- ◆ 19.1 The awarding body must ensure its approved centres retain evidence of trainers, assessor and internal verifier's occupational competence and relevant qualifications (including any peripatetic trainers, assessors and internal verifiers).

The Auditor was unable to review documentation across all providers during this tranche of monitoring visits in respect of occupational competence.

This was identified as a non-compliance within the centre monitoring report for 2011-12 with STA Awarding Body subsequently issuing guidance to all providers, *Monitoring Visits and Data Protection, Guidance for STA Course Organisers and Tutors*, specifying the documentation that must be available during a monitoring visit.

Therefore, the awarding body must take further steps to ensure that providers delivering SQA accredited qualifications make the necessary evidence of occupational competence available for review by the Auditor as part any centre monitoring activity.

Non-compliance No. 3 refers.

Observations

The Auditor considers that the following areas, whilst meeting SQA Accreditation's *Awarding Body Criteria (2007)*, have the potential for improvement:

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

Specifically criterion:

The awarding body must:

- ◆ 6.2 Communicate to its approved centres, External Verifiers and other key stakeholders, any pertinent information in connection with SQA accredited qualifications and the awarding body activities.

And

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

At Provider 1, the Auditor was presented with a *Course Acceptance Form*, dated 13 September 2012, for Emergency First Aid at Work as the provider believed this to be a course that was delivered under the auspices of SQA Accreditation.

However, the title of the qualification noted within the form is STA Level 2 Award in Emergency First Aid at Work (QCF). Clearly, this indicates that the qualification is regulated by Ofqual.

The associated CAPP 1 Form did not bring any clarification to the issue as it only referenced 'EFAW', which was added by the provider.

The provider was unclear on the difference between the various regulatory regimes and the impact upon accredited/regulated qualifications. A review of a range of other completed forms documentation highlighted the use of different titling conventions which included references to the National Rescue Standard (NaRS) and QCF but not SQA.

During the 2012 STA awarding body audit SQA Accreditation was advised that the rule of thumb was that the course location was paramount in determining the regulator designation around qualification delivery. In essence, if a course was delivered at a Scottish venue, the successful candidates would be issued with a certificate indicating achievement of the SQA accredited version of the relevant qualification.

In respect of this particular course this has not been the case despite delivery at a Scottish venue.

This issue was identified as a non-compliance during the STA audit for 2012 and the Auditor is conscious that the awarding body is taking action to address the issue going forward. Therefore, the Auditor is content to raise an observation at this time and will recommend that the actions taken to resolve this issue are checked as part of the next cycle of centre monitoring activity. **Observation 1 refers.**

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.

For the purposes of retaining status as a validated Tutor, Provider 4 has undertaken a number of online updates testing knowledge and understanding within a designated subject area.

However, whilst accepting that such an approach can be a contributory element to ensuring tutor competence, the Provider believed that it does not retain the robustness of the previous methodology that involved STA National Tutor's delivering the update courses.

The provider believes the opportunity for peer review and networking with other providers has been lost, as well as the opportunity to apply the knowledge and understanding to tutoring in a practice environment.

This was the only concern encountered by the Auditor in respect of online updates during the 2012-13 cycle of centre monitoring. Nonetheless, STA Awarding Body may wish to consider checking that similar concerns are not present amongst other providers approved to deliver SQA accredited qualifications. **Observation 2 refers.**

Section 3: Action plan

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

SQA Accreditation risk rates each non-compliance recorded during an audit of the awarding body. This section lists the grade of risk attached to each of the awarding body's non-compliances. See Appendix 2 for an explanation of grades of risk.

An observation will be noted to ensure that any area of potential improvement is noted 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 future monitoring activity for the awarding body.

Non-compliance

Non-compliance	Agreed action and date	Criterion	Risk rating
1. The Auditor was unable to gain access to Provider 3 despite several attempts to agree a suitable time and date between 23 October 2012 and 13 February 2013.	STA Awarding Body must reiterate to all approved providers the need to fully support the quality assurance activities of the Qualification Regulator, taking the appropriate action against those providers whose actions leave the awarding body in a non-compliant position in respect of either the <i>Awarding Body Criteria (2007)</i> or <i>SQA Accreditation's Regulatory Principles (2011)</i> . By 30 June 2013. Closed out 22 August 2013.	Criteria 6.2, 6.4 and 6.5 refer.	4

Non-compliance	Agreed action and date	Criterion	Risk rating
2. At Provider 5, the Auditor was presented with photocopies of completed candidate examination papers.	STA Awarding Body must take appropriate action to ensure that providers are clear on the unacceptability of copying examination papers, identifying those who have done so and conducting checks to ensure that any examination activity has not been compromised through such activity. By 31 July 2013. Closed out 22 August 2013.	Key Goal 18 refers.	3
3. The Auditor was unable to review documentation across all providers during this tranche of monitoring visits in respect of occupational competence.	The awarding body must take further steps to ensure that providers delivering SQA accredited qualifications make the necessary evidence of occupational available for review by the Auditor as part any centre monitoring activity. By 30 June 2013. Closed out 26 July 2013.	Criterion 19.1 refers.	3

Observations

Observations	Recommendations	Criterion
1. At Provider 1, the Auditor was presented with a Course Acceptance Form, dated 13 September 2012, for the STA Level 2 Award in Emergency First Aid at Work (QCF), believing this to be a course that was delivered under the auspices of SQA	This issue was identified as a non-compliance during the STA audit for 2012 and the Auditor is conscious that the awarding body is taking action to address the issue going forward.	Criterion 6.2 and Key Goal 10 refer.

Observations	Recommendations	Criterion
Accreditation.		
2. Provider 4 raised concerns regarding the robustness and suitability of online tutor updates.	STA Awarding Body may wish to consider checking that similar concerns regarding online updates are not present amongst other providers approved to deliver SQA accredited qualifications.	Key Goal 19 refers.

Signatures of agreement to awarding body action plan: STA 2013

For and on behalf of STA Awarding Body: **For and on behalf of SQA Accreditation:**

Signature

Signature

.....

.....

Designation

Designation

.....

.....

Date

Date

.....

.....

Appendix 1: Documents reviewed

The following documents were reviewed during the course of the centre monitoring visits.

Document title	Version number (if known)	Issue date (if known)
STA Emergency First Aid at Work	Edition 6.1	
STA CPR & AED First Aid	Edition 3.1	
HSE Training Standard for Delivery of Emergency First Aid at Work Courses for the Purposes of the Health and Safety (First-Aid) Regulations 1981		
STA Pool Rescuer		
STA Pool Plant Tutor Manual	v12.1	2012
Monitoring Visits and Data Protection, Guidance for STA Course Organisers and Tutors		
STA Statement of Compliance with SQA Accreditation Regulatory Principles (2011)		17/12/12
Course Registration Price List	v13.1	2013
Customer Service Statement	V12.1	2012
Equal Opportunities Policy	V3	
STA Moderation Guidelines		
STA Tutor Structure Information	v2	2010
Procedure for Recognition of STA Tutor/Examiners		
Reasonable Adjustments Policy		
Enquiries and Results and Appeals Procedure		2010
STA Complaints Procedure	V13.1	
STA Procedures Manual	V2.5,	Issue 7

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 that have been identified as having a major impact. The risk rating also allows SQA Accreditation to target its resources to support awarding bodies in improving their performance.

Rating	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 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.
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 procedures 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.