



# **SQA Accreditation**

**Visit to Education Development International (EDI)  
Limited**

**Awarding body centre report**

**29 August to 27 November 2012**

## **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.

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## 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

Three centre visits were conducted between 29 August and 27 November 2012.

## Section 2: Discussion

### Areas of good practice

The following areas of good practice were noted:

Centre 1 particularly values EDI's dedicated centre support. The response times to queries was identified as a plus and was noted as a consequence of having named points of contact within the awarding body.

The awarding body's willingness to enter into a specific service level agreement is seen as beneficial to the business objectives of the centre.

In general, the centre held a mainly positive view regarding EDI's service delivery.

Centre 2 considers the level of support provided by the EDI appointed External Verifier to be of particular benefit. Specifically, a willingness to be flexible around dates for verification visits and an approachability when dealing with queries were noted as key strengths.

Centre 3 considers the awarding body's use of an online system for registering and certificating candidates to be of particular benefit as it supports the commercial viability of the business in terms of public funding.

The centre also highlighted the high level of support provided through the external verification process, noting that the appointed External Verifier is available at any time to provide guidance and respond to queries.

The available course materials are seen as transparent and easily understood by the assessment team and candidates.

## 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 9: The awarding body has open and transparent procedures for complaints and appeals.**

Specifically criterion:

- ◆ 9.1 The awarding body must publish and implement an appeals and complaints procedure which includes:

9.1.4 The circumstances under which a centre or candidate is entitled to make an appeal or complaint to SQA Accrediting Body.

At Centre 3, the Auditor was presented with a centre devised appeals procedure that does not make reference to a candidate's right to make representation to SQA Accreditation in its role as qualification regulator at the appropriate point in any appeal process.

This is a recurring non-compliance for the awarding body, having been raised as part of the centre monitoring activity for 2009–10, 2010–11 and 2011-12.

As part of EDI's centre monitoring report for 2011-12 the awarding body was instructed to 'ensure that all relevant External Verifiers are provided with a specific directive to review all centre-devised appeals and complaints policies as part of the next available external verification visit to centres delivering SQA accredited qualifications'

Also, that 'external verification reports must clearly indicate that this activity has taken place, as well as detailing the actions required on the part of both centre and awarding body representatives to resolve any identified deficiencies in this area'.

On 2 July 2012, EDI confirmed that the following actions had been taken:

The Quality Assurance Report (QAR) was amended to specifically include a criterion linked to the awarding body's appeals procedure, ensuring that Quality Advisors check any centre devised procedure and record this fact in the QAR.

The QAR was amended to incorporate a requirement for the above activity to be noted and issued to all Quality Advisors.

A mandatory webinar session was held in which all of the above was highlighted to EDI's team of Quality Advisors. However, despite these actions being there remains evidence that the issue is still outstanding and the Auditor has no choice but to re-instate the non-compliance.

Therefore, EDI must consider additional steps to ensure that the issue around centre-devised appeals and complaints policies is adequately resolved. The Auditor is mindful of previous steps taken by the awarding body in this respect and it may be that a degree of increased moderation of external verification activity is required to ensure that such centre-devised policies are reviewed in a consistent manner. **Non-compliance No1 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, assessors and internal verifier's occupational competence and relevant qualifications (including any peripatetic trainers, assessors and internal verifiers).

Across the centres sampled during this round of monitoring activity the Auditor did not gain access to full occupational competence records and relevant qualifications.

At Centre 1, there was a stated intention to forward relevant documentation to the Auditor for review following the date of the visit. At the time of writing this report no subsequent documentation has been made available.

Therefore, EDI must ensure that approved centres retain evidence of occupational competence and relevant qualifications for all members of the assessment and verification team, making them available to the qualification regulator for audit purposes. **Non-compliance 2 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.**

During the preparation for the monitoring visit to Centre 3, the Auditor noted that the centre's website does not reference EDI as an awarding body or the relevant qualifications for which accreditation is held.

The Auditor is aware that the centre has held EDI approval status for some considerable time and has delivered a range of EDI qualifications over the period. Therefore, it seems somewhat strange that the centre appears to have chosen not to promote its relationship with the awarding body.

Discussions with the Centre Co-ordinator suggested indicated that there was already an awareness that the organisation's website was not necessarily up to date in a number of areas such as staffing and qualifications being offered.

The awarding body may feel that is perhaps not in a position to regulate the content of approved centre websites, should they be active and available for scrutiny, but it may wish to encourage centres to conduct a review of their own website and consider what actions could be taken to actively promote EDI and any relevant accredited provision.

**Observation 1 refers.**

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 7: The awarding body has systems and procedures for the approval of centres.**

As part of the monitoring activity for Centre 3, the Auditor was provided with a copy of an approval certificate that indicated that the centre is approved until 30 September 2013 for *EDI Qualifications Credit Framework (QCF)*, *EDI National/Scottish Vocational Qualifications* and *EDI Vocational Qualifications*.

The centre representatives were not sure why the centre held approval for QCF, SVQ and NVQ qualifications as the centre does not deliver these types of qualification through EDI.

The Auditor noted that the current list of approved centres provided by EDI on 1 October 2012 indicates that the centre holds approval to deliver SVQs in Customer Service.

However, the Centre Co-ordinator believes this is to be incorrect. It was noted that the centre had delivered SVQs in warehousing and Administration in the past but there was no knowledge of Customer Service being part of any portfolio of qualifications for which approval was held.

In respect of Centre 1, the Auditor noted that the centre was classified as inactive. Evidence secured during the monitoring visit to the centre clearly shows this not to be the case.

The centre was able to produce an approval certificate that indicated that the centre is approved until 28 February 2013 for *EDI Qualifications Credit Framework* and *EDI National/Scottish Vocational Qualifications*.

The Auditor is aware that issues regarding the currency and accuracy of approved centre information have been raised as part of previous quality assurance reports and that EDI has gone some considerable way to improve the quality of information provided to SQA Accreditation.

Therefore, EDI may wish to continue to review the nature and content of its approved centre listing to ensure that information in this respect held within Quickr is as current and accurate as possible in support of SQA Accreditation's on going centre monitoring activities. **Observation 2 refers.**

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

Specifically criterion:

- ◆ 9.1 The awarding body must publish and implement an appeals and complaints procedure which includes:

9.1.3 The circumstances under which a centre or candidate is entitled to make an appeal or complaint to the awarding body.

At Centre 3, the Auditor noted that the centre devised appeals procedure made specific reference to any appeals being directed to an awarding body other than EDI.

In the context of the Scottish Vocational Qualifications (SVQs) that the centre is currently delivering, the Auditor appreciates that the wording makes perfect sense. However, relative to a potential appeal in respect of Workplace Core Skills the wording is inappropriate and could result in the candidate contacting the wrong awarding body.

Therefore, EDI may wish to advise External Verifiers to review all centre devised policies, at centres holding multiple awarding body approval, to encourage any such references to awarding bodies to remain as generic as possible. **Observation 3 refers.**

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

Specifically criterion:

The awarding body must:

- ◆ 10.9 Ensure that candidates seeking certification for a full SVQ, a Workplace Core Skill Unit or the Assessor/Verifier Units are registered for at least 10 weeks before a claim for certification is made.

During discussions at Centre 2 on the nature and purposes of the '10 week rule' it became apparent that centre representatives believed the rule to be no longer extant in respect of SVQ qualifications and Workplace Core Skills.

The Auditor is conscious that the '10 week rule' is no longer applicable in respect of QCF qualifications and it would appear that this has been erroneously interpreted by the centre to apply to the relevant SQA accredited qualifications also. This is possibly an unforeseen consequence of the organisation holding 'key account' status with the awarding body, with a greater degree of strategic engagement taking place at head office level in England.

Consequently, EDI may wish to take the opportunity to remind all approved centres and External Verifiers that the '10 week rule' is still applicable as per *Regulatory Principles (2011) RPDIR – 1.00* which was issued on 21 March 2012 and is available on the SQA Accreditation section of SQA's website. **Observation 4 refers.**

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

Specifically criterion:

- ◆ 16.1 The awarding body must design an assessment methodology that:
  - 16.1.2 Seeks to encourage simple and practicable assessment and discourage unnecessary bureaucracy.

At Centre 3, the Auditor sampled assessments linked to Workplace Core Skills at SCQF Level 4. In particular, the assessments were related to *Working with Others (F44W 04)* and *Numeracy (F44F 04)*.

SQA Accreditation's *Guide to assessing Workplace Core Skills*, 2008, states that where 'a candidate is working towards an SVQ, and Core Skills are a natural part of that SVQ, it is possible to assess the SVQ and the Core Skills simultaneously — the assessor does not need to construct separate Core Skill assessments'

It also notes that where 'some Core Skills are only partly implicit in an SVQ and will need extra bits of assessment to complete them. The Assessment Support Packs for each Core Skills Unit give exemplar assessment which can be used for this purpose'.

No SVQ portfolios were available on the day of the visit to Centre 3 and the sampled assessment reviewed by the Auditor were initially described by centre representatives as extra evidence generated through the use of exemplar assessments should they be needed to prove competence.

The Auditor was not clear on the stance taken here as the candidates were all practising Dental Nurses, undertaking an SVQ Dental Nursing at SCQF Level 7, from which naturally occurring evidence of competence in respect of working with others and numeracy would be a natural assumption.

Centre representatives agreed that the opportunities to evidence competence are available in the above manner but the centre had chosen to use simulated assessments.

The Auditor would contend that this is not in accord with the notion of holistic assessment and brings an unnecessary level of bureaucracy to the assessment process, not to mention an increased burden of evidence gathering upon the candidates.

Therefore, EDI may wish to ensure that approved centres undertaking assessment and verification for Workplace Core Skills provide candidates with the maximum opportunity to use naturally occurring evidence. Also, that appointed External Verifiers should ensure that any decision to use simulated assessments at approved centres are robust and do not result in unnecessary bureaucracy for all stakeholders. **Observation 5 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. At Centre 3, the Auditor was presented with a centre devised appeals procedure that does not make reference to a candidate's right to make representation to SQA Accreditation in its role as qualification regulator.	EDI must consider additional steps to ensure that the issue around centre-devised appeals and complaints policies is adequately resolved. This may include a degree of increased moderation of external verification activity to ensure that such centre- devised policies are reviewed in a consistent manner. By 30 April 2013.  <b>Closed out 30 April 2013.</b>	Criterion 9.1.4 refers.	<b>2</b>
2. Across the centres sampled during this round of monitoring activity the Auditor did not gain access to full occupational	EDI must ensure that approved centres retain evidence of occupational competence and relevant qualifications for all	Criterion 19.1 refers.	<b>2</b>

Non-compliance	Agreed action and date	Criterion	Risk rating
competence records and relevant qualifications.	members of the assessment and verification team, making them available to the qualification regulator for audit purposes. By 30 April 2013. <b>Closed out 30 April 2013.</b>		

### Observations

Observations	Recommendations	Criterion
1. During the preparation for the monitoring visit to Centre 3, the Auditor noted that the centre's website does not reference EDI as an awarding body or the relevant qualifications for which accreditation is held.	The awarding body may wish to encourage centres to conduct a review of their own website and consider what actions could be taken to actively promote EDI and any relevant accredited provision.	Key Goal 6 refers.
2. At Centres 1 and 3, the Auditor was unable to clearly determine the qualification range for which accreditation is held.	EDI may wish to continue to review the nature and content of its approved centre listing to ensure that information in this respect held within Quickr is as current and accurate as possible in support of SQA Accreditation's on going centre monitoring activities.	Criterion 6.2 and Key Goal 7 refer.
3. At Centre 3, the Auditor noted that the centre devised appeals procedure made specific reference to any appeals being directed to an awarding body other than EDI.	EDI may wish to advise External Verifiers to review all centre devised policies, at centres holding multiple awarding body approval, to encourage any such references to awarding bodies to remain as generic as possible.	Criterion 9.1.3 refers.
4. During discussions at Centre 2 on the nature and purposes of the '10 week rule' it became apparent that centre representatives believed the rule to be no longer extant in respect of SVQ qualifications and Workplace Core Skills.	EDI may wish to take the opportunity to remind all approved centres and External Verifiers that the '10 week rule' is still applicable as per <i>Regulatory Principles (2011) RPDIR – 1.00.</i>	Criterion 10.9 refers.

<b>Observations</b>	<b>Recommendations</b>	<b>Criterion</b>
5. At Centre 3, the Auditor considered the assessment methodology used in relation to Workplace Core Skills to be potentially bureaucratic.	EDI may wish to ensure that approved centres undertaking assessment and verification for Workplace Core Skills provide candidates with the maximum opportunity to use naturally occurring evidence. Also, that appointed External Verifiers should ensure that any decision to use simulated assessments at approved centres are robust and do not result in unnecessary bureaucracy for all stakeholders.	Criterion 16.1.2 refers.

## **Signatures of agreement to awarding body action plan: EDI 2012**

**For and on behalf of EDI:**

**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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## 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)
EDI Qualifications Update		July 2012
EDI Scottish Certificate for Personal Licence Holders Support Pack	Version 2	
EDI Appeals policy and process for learners and centres		
EDI Scottish Certificate for Personal Licence Holders Learner Pack		1 March 2012
EDI Guidance notes for centres on reasonable adjustments for learners with particular assessment requirements		July 2012
EDI Documents and records retention policy		
EDI Examination Guide for EDI Centres		May 2012

## 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.