



Audit Report

**The National Examination Board in Occupational
Safety and Health (NEBOSH)**

4 and 5 February 2014

Note

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

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

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

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Executive summary

This was the second audit of the National Examination Board in Occupational Safety and Health (NEBOSH) since it was approved as an awarding body by SQA Accreditation in 2006.

1.1 Scope and approach

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

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

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

The following timescales apply:

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

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

1.2 Awarding body audit report timeline

| | |
|---|-----------------------|
| NEBOSH audit date | 4 and 5 February 2014 |
| SQA Accreditation audit report date | 26 February 2014 |
| Audit Report and Action Plan to be signed and submitted by NEBOSH | 9 April 2014 |

1.3 Background

NEBOSH was approved by SQA Accreditation as an awarding body during 2009. NEBOSH is a nationally recognised awarding body dealing with qualifications covering the occupational health and safety, environmental management and risk management sectors. NEBOSH achieved ISO 9001 status in 2006.

The Audit Team was provided with full access to the awarding body's Leicester premises, staff and documentation.

1.4 Overview

As a result of the audit and post-audit activities, one Requirement has been recorded and one Recommendation has been noted.

The one Requirement forms the basis of the NEBOSH Action Plan. This must be completed and submitted to SQA Accreditation for agreement within 30 working days of the audit report being issued. The Action Plan must be submitted by 9 April 2014.

| Outcome(s) | Area(s) of concern | Risk rating |
|------------------|--------------------|-------------|
| Requirement 1 | Principle 21 | High |
| Recommendation 1 | Principle 3 | N/a |

2 Audit findings

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

2.1 Requirements

Principle 21. The awarding body must take measures in the design and issuing of their certificates to protect against fraudulent use.

During a walkthrough of NEBOSH's procedures for the registration and certification of learners, the Lead Auditor noted that the location where NEBOSH stores its paper stocks of certificate paper was not adequately secure. NEBOSH must put measures in place to ensure that blank certificates remain secure at all times and that only staff with the appropriate access have the authority to print certificates. **Requirement 1** refers.

The evidence available indicates that NEBOSH does not meet the requirements of Principle 21. This has been recorded as **Requirement 1**.

2.2 Recommendations

Principle 3. The awarding body must ensure that they employ robust processes to protect their own business interests as well as the interests of their approved centres and learners.

During a visit to the Accreditation Department, the Audit Team reviewed the processes and systems which support activity around Accreditation Advisor audits and inspection visits. It was noted that output from the Accreditation Advisor visits does not result in any formal risk rating of the provider based on evidence seen during the visit or the actions generated within the audit report.

The system used to track issues raised during inspection visits did result in a formal risk rating of the provider. Where centres were identified as higher risk, the cycle of inspection activity would be altered accordingly.

The Audit Team also noted that the issues identified from audits and inspections were not being effectively shared and therefore not informing both activities. NEBOSH has already identified this and informed the Audit Team of the changes they are considering.

The awarding body is currently undergoing a significant change to its IT systems which will result in a completely overhauled Management Information System (MIS). The Audit Team identified that under the new MIS there is real opportunity for NEBOSH to centralise the intelligence and information it gathers and share this across departments to create enhanced risk profiles of its providers. This could in turn be used to target resources more effectively on quality assurance activities where risk has been identified.

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

3 Outstanding approval and accreditation conditions

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

| Principle no. | Condition | Date due |
|---------------|-----------|----------|
| N/a | | |

4 Risk rating of Requirements

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

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

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

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

5 Table of awards

Accredited qualifications currently offered by NEBOSH.

| SQA-accredited qualification title | Level | Code | Accreditation date | Re-accreditation date |
|--|---------------|---------|--------------------|-----------------------|
| NEBOSH National Diploma in Environmental Management | SCQF Level 10 | R109 04 | 08/12/2010 | 31/12/2015 |
| NEBOSH National Certificate in Construction Health and Safety | SCQF Level 6 | R110 04 | 08/12/2010 | 31/12/2015 |
| NEBOSH National Certificate in Fire Safety and Risk Management | SCQF Level 6 | R111 04 | 08/12/2010 | 31/12/2017 |
| NEBOSH National Diploma in Occupational Health and Safety | SCQF Level 10 | R113 04 | 13/12/2010 | 31/12/2015 |
| NEBOSH International Diploma in Occupational Health and Safety | SCQF Level 10 | R202 04 | 11/01/2012 | 31/12/2016 |
| NEBOSH National Certificate in the Management of Health and Well-Being at Work | SCQF Level 6 | R203 04 | 11/01/2012 | 31/12/2016 |
| NEBOSH Award in Health and Safety at Work | SCQF Level 5 | R204 04 | 20/12/2011 | 31/12/2016 |
| NEBOSH Certificate in Environmental Management | SCQF Level 6 | R258 04 | 24/10/2012 | 31/01/2018 |
| NEBOSH National General Certificate in Occupational Health and Safety | SCQF Level 6 | R367 04 | 27/11/2013 | 31/12/2018 |

| SQA-accredited qualification title | Level | Code | Accreditation date | Re-accreditation date |
|--|--------------|-------------|---------------------------|------------------------------|
| NEBOSH International General Certificate in Occupational Health and Safety | SCQF Level 6 | R368 04 | 27/11/2013 | 31/12/2018 |
| NEBOSH International Certificate in Construction Health and Safety | SCQF Level 6 | R369 04 | 27/11/2013 | 31/12/2018 |
| NEBOSH International Certificate in Fire Safety and Risk Management | SCQF Level 6 | R370 04 | 27/11/2013 | 31/12/2018 |

6 List of documents reviewed pre- and post-audit

| Document title | Version number/Date of issue |
|---|------------------------------|
| ST002 Item authorisation and review procedure | v1 130114 |
| ST004 Production of question papers | v5 130114 |
| ST006 Policy and procedures for the marking of examinations | v1 January 2014 |
| ST007 Item authorisation review procedure | v2 130114 |
| ST022 NEBOSH Examiner's Guidance | v2 January 2014 |
| Instructions for Conducting Examinations | v8 May 2013 |
| Sample practical unit guidance Unit EC2 course providers candidates | |
| ST004 Production of standard question papers | v3 final |
| ST007 Item authorisation procedure | v1 |
| ST009 Production of on-demand question papers version | v3 final |
| ST012 Maintaining a script archive | v1 |
| ST024 Examiners' Reports | v4 |
| ST026 Internal assessment of certificate practical applications | v4 080313 final |
| ST003 Reasonable Adjustments and Special Considerations Policy | v9 260313 |
| Qualifications and Technical Council notes relevant extract | |
| Qualifications and Technical Council Agenda | |
| Sample course provider consultation survey | |
| Sample unit result transcript with SCQF credit details | |
| Sample qualification certificate | |
| Sample unit certificate | |
| Sample SQA accreditation confirmation letter | |
| SQA webpage - NEBOSH qualification titles | |
| Certificate Panel Agenda | |
| Certificate Panel meeting notes | |

| Document title | Version number/Date of issue |
|---|------------------------------|
| Diploma Panel Agenda | |
| Diploma Panel Meeting Notes | |
| Specialist Panel meeting notes | |
| Specialist Qualifications Panel Agenda | |
| Customer complaints procedure | v 8 210213 |
| List of Scottish college course providers | 10.12.13 |
| NEBOSH letter re SPSO complaint escalation draft | v5 101213 |
| NEBOSH webpage - Regulatory review of unresolved complaints for SQA-accredited qualifications | |
| NEBOSH webpage - SPSO Complaint escalation | |
| SPSO complaint escalation email - sample | |
| ST005 Malpractice Policy | v9 |
| Malpractice Log | Jan 14 |
| CEQM004 Corrective action incl control of non-conforming product | v5 |
| Centre withdrawal policy | v1 270313 |
| NEBOSH Course Provider Fees List | v1 March 2013 |
| CS021 Fraudulent certificate policy | v2.1. 260811 |
| ST008 Enquiries and Appeals policy | v8 060213 |
| Customer Service Monitoring Q4 October | December 13 |
| NEBOSH Enquiry About results for SQA-accredited qualifications | 1 Jan - 30 Oct 13 |
| FA003 Policy on Setting Fees | v3 070312 |
| Course Providers Fees List 2013/14 | v1 March 2013 |
| NEBOSH Fees List 2013/2014 | |
| NEBOSH Shop webpage | |
| Students Fees List 201314 | v1 March 2013 |
| Students Fees List QA | v1 March 2013 |
| CEGM 017 Terms of Reference for QTC and Panels | |
| CEGM 004 Role profile of Trustees | |
| CEGM 010 Code of Conduct for Trustees | |
| CEGM 013 Role and responsibilities of NEBOSH Council members | |

| Document title | Version number/Date of issue |
|---|------------------------------|
| CEGM 014 Code of Conduct for Council QTC and Panels | |
| CEGM 016 Terms of Reference for Trustees' meetings | |
| CEGM 019 Terms of Reference for NEBOSH Council Meetings | |
| CEGM 020 Declaration of interests Policy & Form | |
| CS006 Customer Service Statement | v9 Jun 12 |
| CE006 Reporting to Charity Commission | |
| CEGM 001 Memorandum of Association | |
| CEGM 002 Articles of Association | |
| CEQM008 NEBOSH Health and Safety Policy Statement | v6 |
| CEQM011 NEBOSH Environmental Policy | v3 140813 |
| CS012 Policy Data Protection | v4 060313 |
| Extract from risk register - Competition law | |
| FA031 Filing Company Accounts to Companies House | |
| FA30 Submitting annual return to Companies House | |
| ST015 Ext Equal Ops policy | v6 030413 |
| AC004 Course Provider Handbook | v10 280313 |
| AC003 AA Visit Procedure | |
| AC009 Monitoring of conduct of examinations | v2 16.06.11 |
| AC002 Monitoring course providers | |
| AC006 Student Terms and Conditions | May 2013 v3 |
| AC005 Course Provider Accreditation Agreement | 310811 v3 |
| AC010 New Accreditation Applications | v1 310811 |
| BSI NEBOSH ISO 9001 certificate | |
| CEGM 025 Risk Management Policy | |
| CEQM005 Internal Audit | v6 290512 |
| NEBOSH Investors in People certificate | |
| NEBOSH Quality Manual | v10 300813 |
| Quality policy summary 300813 | v5 final |
| CEHR006 Organisation Chart update | |

| Document title | Version number/Date of issue |
|---|------------------------------|
| Key JD10 Operations Manager | |
| Key JD11 Standards Manager | |
| Key JD12 Standards Officer | |
| Key JD2 Accreditation Manager | |
| Key JD3 Customer Service Manager | |
| Key JD5 Development Officer | |
| Key JD6 Finance & Admin Manager | |
| Key JD7 HR Officer | |
| Key JD8 International development manager | |
| Key JD9 IT Manager | |
| DE002 developing new and significantly revised qualifications | v3 240712 |
| DE003 pilot development process | v3 240712 |
| DE004 Qualification implementation procedure | v8 240712 |
| Sample syllabus summary - National Cert in Environmental Management | |
| EDip Unit ED2 candidate CP Project guidance | v2 220512 |
| Guide to Construction Cert guide | v6 180913 |
| Idip Unit ID candidate CP assignment guidance March 2013 | |
| Ndip Unit D candidate CP assignment guidance March 2013 | |
| Practical guidance - NGC/IGC Unit GC3 | v1 240913 |
| Unit NCC2 candidate CP practical guidance | v4 131212 |
| Unit NHC2 candidate CP practical guidance | v3 131212 |
| guide- Int Construction Cert | v7 |
| Guide - Int. Diploma OHS 230513 course provider | v5 |
| guide - Int. Fire Cert Apr 2013 spec | 121213 v3 |
| Guide - Int. General Cert- Jan 13 spec | v2 180913 |
| guide - Nat Cert in Management Health Well-Being | 310812 v7 |
| Guide - National Diploma in Environmental Management | 210113 final v6 |
| Guide - National Fire Cert - Apr 13 spec | v2 121213 |
| Guide - National General Cert - Jan 13 spec | v3 020114 |

| Document title | Version number/Date of issue |
|--|------------------------------|
| Guide to Nat Diploma in OHS | v8 150114 |
| practical guidance - NFC/IFC Unit FC2 | v4 1213 revisions |
| practical guidance - unit HSW2 | v3 1213 revisions |
| practical guidance - unit ICC2 | V4 131212 |
| practical guidance - Unit EC2 | v4 1213 revisions |
| Sample guide - Certificate in Environmental Management | 070113 v3 |
| Sample leaflet NEBOSH Environmental Cert | May 2012 |
| Guide to Award in H&S at Work | 310512 v4 |
| Website Information about NEBOSH qualifications | |
| NEBOSH certificate re-issue policy | v4 070313 |
| CS019 Customer complaints procedure | v9 130114 |
| Key Job Description Chief Executive | |
| List of NEBOSH UK centres offering SQA-accredited qualifications | |
| List of NEBOSH UK centres offering SQA-accredited qualifications | |
| NEBOSH website | |



7 Action Plan

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

| Areas of concern | Requirement | Risk rating | Proposed action <small>(Please include a description of your intended methodology and details of the evidence that will be provided.)</small> | Target date for completion |
|------------------|--|-------------|--|----------------------------|
| Principle 21 | NEBOSH must put measures in place to ensure that blank certificates remain secure at all times and that only staff with the appropriate access have the authority to print certificates. | High | | |

Signatures of agreement of Action Plan

For and on behalf of NEBOSH:

Signature

.....

Date

.....

For and on behalf of SQA Accreditation:

Signature

.....

Date

.....

8 Acceptance of audit findings

For and on behalf of NEBOSH:

Signature

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Designation

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Date

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For and on behalf of SQA Accreditation:

Signature

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Designation

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Date

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