



# **Centre Monitoring Report**

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

**11 February – 11 March 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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# 1 Introduction

## 1.1 Scope and approach of centre monitoring

SQA Accreditation conducts quality assurance activities of all awarding bodies offering SQA accredited qualifications or Units. This involves monitoring a sample of the awarding body's approved centres/providers or assessment sites. All centre monitoring will be conducted in a consistent manner within and between centres. The aim of monitoring is 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.**
- ◆ Confirm that quality assurance arrangements are being conducted by the awarding body in accordance with its prescribed arrangements.
- ◆ Ensure that quality assurance arrangements are being conducted in a consistent manner, within and between centres.
- ◆ Inform future audit and monitoring activity for the awarding body.

All Principles were included within the scope of the monitoring activity.

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 final centre monitoring date.
- ◆ The awarding body must sign and return the report and associated Action Plan within 30 working days of the centre monitoring 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 Requirements 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 centre monitoring, 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 Centre monitoring report timeline

SQA Accreditation centre monitoring report date 23 April 2014

Date centre monitoring report and Action Plan to be signed and submitted by NEBOSH 5 June 2014

## 1.3 Centre monitoring dates

Seven centres were monitored between 11 February and 11 March 2014.

## 1.4 Overview

As a result of the centre monitoring activities, three Requirements have been raised and three Recommendations have been recorded.

The three Requirements form the basis of the NEBOSH Action Plan. This must be completed and submitted to SQA Accreditation for agreement within 30 working days of the centre monitoring report being issued. The Action Plan must be submitted by 5 June 2014.

Outcome(s)	Area(s) of concern	Risk rating
Requirement 1	Principle 1	Medium
Requirement 2	Principle 6	High
Requirement 3	Principle 18	Low
Recommendation 1	Principle 2	N/A
Recommendation 2	Principle 3	N/A
Recommendation 3	Principle 22	N/A

## 2 Centre monitoring 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 Areas of good practice

Course Provider 1 highlighted the Course Provider Interface (CPI) as a good resource providing valuable information.

Course Provider 2 highlighted the CPI system, which has improved the process of entering information and checking results.

Course Provider 3 highlighted the:

- ◆ CPI system which is paperless and so more eco-friendly and less bureaucratic
- ◆ level of ongoing support and advice from the NEBOSH Accreditation Advisor, especially when seeking accreditation for new qualifications
- ◆ helpful customer contact staff

Course Provider 4 highlighted the:

- ◆ support and guidance from NEBOSH
- ◆ provision of administrative training when required
- ◆ e-mail reminders regarding upcoming deadlines and events, which are especially useful to ensure course providers know the timing of examination registrations and results
- ◆ NEBOSH communication direct to the candidates, which makes the candidates aware of information relevant to them

Course Provider 5 highlighted the:

- ◆ good communication from NEBOSH with relevant advice and timely replies being provided
- ◆ the change in working hours of NEBOSH staff, which allows access to them if needed before the start time of most courses
- ◆ the user-friendly nature of the website where most information can be obtained easily

Course Provider 6 highlighted the:

- ◆ excellent customer service
- ◆ quick response to queries

Course Provider 7 highlighted the:

- ◆ high levels of competence and professionalism displayed by NEBOSH staff at all levels
- ◆ prompt response and quality of service to course providers and delegates
- ◆ integrity of the qualifications, which are recognised throughout the industry
- ◆ significant improvement to procedures for course providers over recent years

## 2.2 Requirements

**Principle 1. The awarding body must deal with SQA Accreditation in an open and co-operative way, and disclose anything which SQA Accreditation would reasonably expect to be made aware.**

Course providers sampled did not routinely retain copies of their NEBOSH Accreditation Advisor visit reports or examination inspections reports. The *NEBOSH Course Provider Handbook, March 2013* details requirements for the retention of candidate data and samples of internally assessed practical scripts for regulatory purposes; the Auditor could not find any reference to the retention of reports. These reports are needed to assist in the provider monitoring carried out by SQA Accreditation.

While the Auditor acknowledges that NEBOSH would willingly supply these reports if requested, this request would compromise the anonymity of providers and hence would not be made for that reason. It is essential, therefore, that providers retain copies of any reports relevant to quality assurance activities undertaken by NEBOSH.

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

**Principle 6. The awarding body and their approved centres must have the relevant expertise, quality assurance procedures, technological, financial, human resources and other physical resources, to carry out their regulated functions, during the life of the qualifications and Units they offer.**

At the time of monitoring, Course Provider 2 had over 2000 candidates enrolled across eight NEBOSH courses in the UK and an even greater number enrolled internationally. Around 90% of the candidates undertake these courses through the provider's e-learning platform. In a recent report, the NEBOSH Accreditation Advisor commented that the provider had some low pass rates across all e-learning platforms, although evidence of review and forward planning was present.

The e-learning platform is managed by just two tutors who, amongst other things, are responsible for the marking of practical assessments, the marking of set homework tasks and interaction with candidates by e-mail/phone to provide support and guidance both in the UK and internationally.

The Lead Tutor at the provider informed the Auditor that another member of staff had been recruited recently in a product development role but they would also be assisting in a tutor role. This information was also communicated to the NEBOSH Accreditation Advisor during the recent visit. Even with an additional part-time tutor and while recognising that a large number of enrolled students may not actually be active on the course, the Auditor noted that the number of enrolled candidates grossly outweighs the number of designated tutors operating at this provider. While these numbers were not specifically identified as a causal factor in the low pass rates mentioned in the Accreditation Advisor report, they were not precluded either as having a potential impact on quality.

The Auditor understands that there is a NEBOSH recommendation of 16–20 students per class but could not find any NEBOSH information on tutor/candidate ratios or related guidance for e-learning provision. Hence this issue could exist within other providers offering this type of provision.

NEBOSH must consider how to mitigate the potential risk of large candidate numbers relative to tutor numbers across providers offering e-learning provision, in order to protect the integrity of qualifications and the interests of candidates.

The evidence available indicates that NEBOSH does not meet the requirements of Principle 6. This has been raised as **Requirement 2**.

**Principle 18. The awarding body and their centres must deal with complaints on a fair and equitable basis, in line with their published procedures and timescales, and without unreasonable delay. The awarding body, their centres and learners must be made aware of how and when they can complain to SQA Accreditation. Where a complaint is upheld, the awarding body and/or centre must take appropriate, corrective and/or preventative action.**

The complaints procedure devised by Course Provider 4 did not make learners aware of how and when they can complain to NEBOSH or SQA Accreditation.

The evidence available indicates that NEBOSH does not meet the requirements of Principle 18. This has been raised as **Requirement 3**.

## 2.2 Recommendations

**Principle 2. The awarding body must publish clear information on their products, services and associated charges and fees.**

Course providers sampled were unclear on the frequency of NEBOSH Accreditation Advisor visits. While they accepted that the frequency is essentially risk based, being dependent on the qualifications being offered and the track record of the provider, as detailed in the *Course Provider Handbook March 2013*, the absence of any time parameters emerged as an area needing clarity. Provider 1 for example, who was accredited in 2011, had not yet received a NEBOSH Accreditation Advisor visit. This provider assumed that such a visit may form part of their re-accreditation process later this year but was unsure.

From information gained at the recent awarding body audit, the Auditor understands that course providers will be visited at least once every three years. This information on frequency is not published in the *Course Provider Handbook* however. The Auditor also understands the rationale for not publishing definitive timelines is that NEBOSH wants providers to be consistent over time, not geared to awarding body quality assurance activities. Nonetheless, in the interest of fairness and transparency and to protect against misinformation among providers, NEBOSH may wish to give course providers an indication of the potential frequency of NEBOSH Accreditation Advisor visits. This issue has been raised in previous centre monitoring reports and remains an ongoing concern.

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

**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.**

Course Provider 1 informed the Auditor that the on-demand examinations are requested 30 working days before the proposed date of the examination, with candidate registrations to be completed 10 working days before the examination date. The provider felt that the 30 working day timeline was excessive for an on-demand facility especially when trying to meet client need. NEBOSH may wish to review timelines for on-demand examinations.

In exceptional circumstances, NEBOSH allows course providers to make an application to view individual candidate scripts. Course Provider 6 felt that the cost associated with this activity was excessive as it involves travel to NEBOSH offices in Leicester and staff cover; this cost discouraged the provider from pursuing an application which may have been beneficial to candidates. NEBOSH may wish to review options for providers in this regard.

After each standard sitting, NEBOSH produces examiners' reports, which are designed to give an indication of answer content for each examination question. Course Provider 6 commented that these reports do not give any feedback information on their examination performance as an individual provider. Staff suggested that it would be beneficial if NEBOSH were to include a profile on the provider's results summary sheet, showing the average attained across all providers for each examination question and then what the provider themselves achieved. This would assist the provider in identifying potential areas for development in their tuition delivery and should in turn lead to improved candidate performance. NEBOSH may wish to explore the possibility of result profiling as described.

Course Provider 6 commented that the book, *Introduction to Health and Safety at Work (2011)* endorsed by NEBOSH for the NEBOSH National General Certificate contains information which is out of date. Although the Auditor understands that the book is not presented by NEBOSH as the only suitable publication available to support their qualifications, it is endorsed as 'offering high quality support'. This endorsement means that the book does tend to be a popular choice amongst providers who, in the case of Provider 6, become aggrieved when some information is not current and so not offering high quality support in every instance. The Auditor understands from communication with NEBOSH that the book is likely to be reviewed by the publishers in the near future. Nonetheless, in the interests of course providers and candidates, NEBOSH may wish to append its endorsement with a disclaimer or similar, ensuring course providers are aware that texts can become out of date over time due to the time lapse between industry changes, syllabus updates and publication revisions.

Candidates in Course Provider 7 felt that feedback gained from the Enquiry About Results (EAR) process would be more beneficial and represent better value for money if it yielded qualitative data. The Auditor acknowledges that a detailed analysis of performance is outwith the scope of the current *NEBOSH Enquiry about Results Policy and Procedures, February 2013*. Accordingly, NEBOSH may wish to consider the type of feedback that could be made available to candidates.

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

**Principle 22. The awarding body must ensure that qualification and Unit certificates meet SQA Accreditation's minimum requirements, reflect learner achievement, are only issued on the basis of a valid claim, and are supplied within a reasonable and clearly communicated timescale.**

The Examinations Officer at Course Provider 2 informed the Auditor that certificates are received in a large batch arranged in alphabetical order with a mix of examination dates and examination venues. The provider then has to sort the certificates and extract all the UK-based ones to be sent to candidates and all the international ones to be sent to the candidates' venue. This is a very time consuming process for a large provider. The Examinations Officer suggested that it would be a great improvement if certificates were sent in result batches for either each examination date or each examination venue.

Course Provider 3 commented that it would be better to send certificates directly to candidates rather than providers, as is the practice of many other examination bodies.

The Auditor is aware that NEBOSH is considering outsourcing its certification process and so may wish to take note of provider suggestions for improvement in this regard.

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

### 3 List of documents reviewed during centre monitoring

Document title	Date of issue	Version number
NEBOSH Course Provider Handbook	March 2013	
NEBOSH Instructions for Conducting Examinations	July 2013	Version 8
NEBOSH Course Provider Accreditation Agreement		
NEBOSH Enquiries About Results (EARs) policy and procedures	February 2013	Version 8
NEBOSH Customer Complaints Procedure	January 2014	Version 9
Course Provider Interface		
NEBOSH accredited centre certificates	Various	
Candidate registration and certification information		
NEBOSH Accreditation Advisor visit reports	2011; 2012; 2013	
Examination venue inspections	2011; 2012;	
Part A applications to become a NEBOSH accredited course provider	Various	
Part B applications to deliver NEBOSH qualifications or Units	Various	
Tutor certificates, CVs, CPD information and logs		
Providers' own health and safety policies; equal opportunities policies; quality assurance policies; data protection policies; appeals/complaints policies	Various	
Provider's complaints log	2013/14	
Provider's malpractice files		
Application for Reasonable Adjustments forms – RA1	2012	
Common scripts – practical application – feedback to assessors	2011	

Internally assessed practical applications – NCC2, NGC3, IGC3, FC2	2011; 2012; 2013	
Moderated practical applications and feedback to course providers	2012; 2013	
Syllabus updates	October 2013	
Student induction materials		
Candidate joining instructions		
Course timetables		
Programmes of study		
Course reviews		
Course feedback surveys		
Lesson/course evaluations		
Records of examination activity		
Training venue checklist		
Seating plans		
Provider's e-learning platform		

## 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 Action Plan

A separate document in Microsoft Word has been forwarded with this centre report.

Areas of concern	Requirement	Risk rating	Proposed action (Please include a description of your intended methodology and details of the evidence that will be provided.)	Target date for completion
Principle 1	Course providers sampled did not routinely retain copies of their NEBOSH Accreditation Advisor visit reports or examination inspection reports. These reports are needed to assist in the provider monitoring carried out by SQA Accreditation. It is therefore essential that providers retain copies of any reports relevant to quality assurance activities undertaken by NEBOSH.	Medium		
Principle 6	At the time of monitoring, Course Provider 2 had over 2000 candidates enrolled across eight NEBOSH courses in the UK with around 90% of the candidates undertaking these courses through the provider's e-learning platform. The e-learning platform is managed by just two tutors. The Auditor noted that the number of enrolled candidates grossly outweighs the number of designated tutors operating at this provider.	High		

Areas of concern	Requirement	Risk rating	Proposed action (Please include a description of your intended methodology and details of the evidence that will be provided.)	Target date for completion
	NEBOSH must consider how to mitigate the potential risk of large candidate numbers relative to tutor numbers across providers offering e-learning provision, in order to protect the integrity of qualifications and the interests of candidates.			
Principle 18	The complaints procedure devised by Course Provider 4 did not make learners aware of how and when they can complain to NEBOSH or SQA Accreditation.	Low		

**Signatures of agreement of Action Plan**

For and on behalf of NEBOSH:

**Signature**

.....

**Date**

.....

For and on behalf of SQA Accreditation:

**Signature**

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**Date**

.....

## 6 Acceptance of centre monitoring findings

For and on behalf of NEBOSH:

**Signature**

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**Designation**

.....

**Date**

.....

For and on behalf of SQA Accreditation:

**Signature**

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**Designation**

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**Date**

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