



# **Audit Report**

## **Safety Training Awards**

**15 January 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 fourth audit of Safety Training Awards (STA) since it was approved as an awarding body by SQA Accreditation on 24 June 2009.

### 1.1 Scope and approach

The audit was designed to review and evaluate STA'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 STA, 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

STA audit date	15 January 2014
SQA Accreditation audit report date	6 February 2014
Date audit report and Action Plan to be signed and submitted by STA	20 March 2014

## 1.3 Background

STA is a nationally recognised awarding body offering qualifications in the following areas: teaching swimming, pool emergency and response, pool life guarding, 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's headquarters are situated in Walsall.

The audit team was provided with full access to the awarding body's Walsall premises, staff and documentation.

## 1.4 Overview

As a result of the audit and post-audit activities, three Requirements have been raised and two Recommendations have been recorded.

The three Requirements form the basis of the STA 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 20 March 2014.

Outcome(s)	Area(s) of concern	Risk rating
Requirement 1	Principle 3 Principle 6	Medium
Requirement 2	Principle 8	Medium
Requirement 3	Principle 22 Regulatory Principles Directive 3	Very Low
Recommendation 1	Principle 1 Principle 6	n/a
Recommendation 2	Principle 2	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 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.**

and

**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.**

The STA document entitled *Moderation of STA Tutors* outlines the awarding body's policy and process for moderating approved Tutors when tutoring and examining STA courses. Within the content of the document, it is stated that 'A Moderator may not moderate the same Tutor more than three consecutive times'.

STA had previously provided Accreditation Auditors with a copy of a list showing the dates on which STA Tutors and Examiners had been subject to moderation. On the day of the audit, the Lead Auditor randomly selected a Tutor/Examiner from the list and requested the associated moderation records for that Tutor/Examiner from STA. The dates on the moderation reports correlated with the dates on the list. However, on inspection of the records provided, it was found that the same Moderator had carried out more than three consecutive moderation activities for the same Tutor/Examiner. Hence, STA was found not to be adhering to its own policy with respect to the moderation of Tutors/Examiners.

The evidence available indicates that STA does not meet the requirements of Principle 3 and Principle 6. This has been raised as **Requirement 1**.

STA must ensure that the same Moderator does not moderate any Tutor/Examiner on more than three consecutive occasions in order to satisfy the requirements of the awarding body's own policy and processes.

**Principle 8. The awarding body must ensure that the identification, design, development and review of qualifications and Units, meet the needs of the users of qualifications.**

The document entitled *STA Development and Review Procedure for Unit Writing and Producing Rules of Combination for the QCF and SCQF* outlines STA's process for identifying, designing, developing and reviewing units/qualifications. The document contains a detailed, step-wise process with an associated flowchart. The staff members or working groups responsible for every activity at each stage are indicated.

On the day of the audit, the Lead Auditor asked to view the documentation which underpins this process relating to the STA Professional Award for Pool Lifeguard at SCQF Level 7 qualification for which STA is SQA accredited. STA representatives were able to provide documentation relating to the SCQF credit rating of the qualification but were unable to provide any other evidence to indicate that the development and review process had been followed accordingly. Hence, the Lead Auditor was unable to obtain evidence to indicate that STA had followed its own processes for the design, development and review of the STA Professional Award for Pool Lifeguard at SCQF Level 7.

The evidence available indicates that STA does not meet the requirements of Principle 8. This has been raised as **Requirement 2**.

STA representatives did, however, indicate that a working group had been tasked with revising the unit/qualification development and review process and the Lead Auditor was also given a demonstration of STA's new system for document control (Basecamp) which uses cloud technology. The Lead Auditor is confident that the new system will allow STA to effectively manage all documentation, including that relating to the unit/qualification development and review processes.

STA must ensure that the documentation relating to the development and review of all subsequent qualifications is retained and that the documentation clearly evidences each stage of STA's revised unit/qualification development and review process.

**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.**

and

### **Regulatory Principles Directive 3 — Logos and Certificate Requirements for SQA Accredited Qualifications**

Prior to audit, STA had submitted samples of the awarding body's candidate certificates for all SQA accredited qualifications. The certificates provided displayed the logo for the International Federation of Swimming Teaching Associations (IFSTA). The IFSTA is a non-profit-making organisation that was set up by the UK's Swimming Teaching Association to provide a platform for international swimming bodies to share and disseminate the principles of best practice.

While the Lead Auditor acknowledges that there are clear links between STA and the IFSTA, Regulatory Principles Directive 3 states that 'It is not permitted for certificates to include centre names, co-branding logos or logos from other organisations, professional bodies and SSC's other than the awarding body(s)'.

Hence, the format of the candidate certificate currently being used by STA does not meet SQA Accreditation's minimum requirements.

The evidence available indicates that STA does not meet the requirements of Principle 22 and Regulatory Principles Directive 3. This has been raised as **Requirement 3**.

STA must remove the IFSTA logo from the format of the STA candidate certificate in order for SQA Accreditation's minimum certificate requirements to be met.

## 2.2 Recommendations

**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.**

and

**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.**

On the day of the audit, the Accreditation Auditors were provided with a demonstration of STA Online. The system is used for the purposes of arranging courses, registering candidates and inputting candidate results. STA online is already live, however the system is currently being upgraded and Accreditation Auditors were shown several new screens and were given a demonstration of how the revisions to the system will operate.

On one of the proposed screens for creating a new course, users are requested to select whether or not the course is for the Ofqual recognised or SQA accredited version of STA's qualifications. The Lead Auditor enquired as to whether or not overseas Tutors/Examiners would be able to create new courses for the SQA accredited versions of STA qualifications and the STA representative indicated that this option would be available for overseas Tutors. Given that STA has been approved by SQA Accreditation for operations within the UK and that the SQA Accreditation logo may not be used outside of the UK, the possibility to create a new course for SQA accredited qualifications should not be made available to STA approved Tutors/Examiners operating overseas.

Once the revisions to STA Online have been finalised, STA will also be able to revise the content of the reports that are generated which provide information on organised courses, candidate registrations and results. These reports will be used to provide SQA Accreditation with any statistics or provider information that may be required.

Hence, STA may wish to ensure that the revisions to STA Online:

- ◆ do not allow Tutors operating overseas to create courses for SQA accredited qualifications
- ◆ facilitate the generation of reports that can be used to supply SQA Accreditation with the correctly formatted and accurate candidate data, approved Tutor/Examiner details and course information

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

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

Prior to audit, STA had populated its allocated Quickr place with a range of documentation to support awarding operations, including policies, processes and related forms. On inspection of this information, the Lead Auditor identified a number of documents which did not make the appropriate references to SQA Accreditation as the Qualifications Regulator for Scotland and/or the SCQF.

For example, the *STA – ISO9001:2000 Procedures Manual* makes no reference to SQA Accreditation, whereas frequent reference is made to the Qualifications and Curriculum Authority (QCA).

STA may wish to review all documentation to ensure that appropriate references are made to SQA Accreditation and/or the SCQF.

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

### 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 STA

SQA-accredited qualification title	Level	Code	Accreditation date	Re-accreditation date
STA Professional Award in Teaching Swimming at SCQF Level 6	SCQF Level 6	R240 04	25/07/2012	31/07/2016
STA Professional Certificate in Teaching Swimming	n/a	R241 04	25/07/2012	31/07/2016
STA Professional Award in Pool Emergency Procedures at SCQF Level 6	SCQF Level 6	R242 04	25/07/2012	31/07/2016
STA Professional Award in Pool Responder at SCQF Level 7	SCQF Level 7	R243 04	25/07/2012	31/07/2016
STA Professional Award in Pool Lifeguard at SCQF Level 7	SCQF Level 7	R244 04	25/07/2012	31/07/2016
STA Award in Emergency First Aid at Work at SCQF Level 5	SCQF Level 5	R272 04	23/01/2013	31/03/2017
STA Award in First Aid at Work at SCQF Level 6	SCQF Level 6	R273 04	23/01/2013	31/03/2017
STA Professional Award in Aquatic Teaching – Baby and Pre-School at SCQF Level 6	SCQF Level 6	R281 04	27/02/2013	28/02/2017

## 6 List of documents reviewed pre and postaudit

Document title	Date of issue	Version number
Equal Opportunities Policy	2012	V12.1
Reasonable Adjustments Policy	2012	V12.1
Special Consideration Policy	2012	V12.1
Monitoring Visits and Data Protection		
STA Award for Pool Lifeguard – Portfolio	2013	V13.2
STA Award for Pool Responder – Portfolio	2013	V13.2
STA Award in Swimming Teaching – Portfolio	2013	V13.2
STA Certificate in Swimming Teaching – Portfolio	2013	V13.2
Pool Rescuer Manual		
STA Statement of Compliance with SQA Regulatory Principles (2011)	17/12/12	
Swimming Teaching Resource Manual	2012	V12.3

Document title	Date of issue	Version number
Certificate of Registration – Quality Management System – ISO 9001:2008	18/06/2012	
Course Registration Price List – Paper Based Registration	2013	V13.1
The STA – ISO9001:2000 Procedures Manual	1 September 2009	V2.5 Issue 7
STA Professional Award in Pool Emergency Procedures at SCQF Level 6		
STA Professional Award for Pool Lifeguard at SCQF Level 7		
STA Professional Award for Pool Responder at SCQF Level 7		
STA Professional Award in Teaching Swimming at SCQF Level 6		
STA Professional Certificate in Teaching Swimming		
STA Level 2 Award in Emergency First Aid at Work (QCF)		
Candidate Application Form	2012	V12.1
STA Barriers to Assessment		
Course Evaluation Form	2012	V12.1
STA Development and Delivery of Assessment Procedure for Units on the QCF and SCQF		V12.1

Document title	Date of issue	Version number
STA Development and Review Procedure for Unit Writing and Producing Rules of Combination for the QCF and SCQF		
New STA Swimming Teaching Qualifications (promotional leaflet)		
Becoming a STA Tutor		
STA Award in Aquatic Teaching – Baby and Pre-school – Practical Marking Sheet	2013	V13.1
Letter of Support – Sports for Special Needs (Baby and Pre-school Qualification)	12/10/2013	
Letter of Support – STA Scotland (Baby and Pre-school Qualification)		
Sample Certificates		
STA Customer Service Statement	2012	V12.1
Lifesaving and First Aid Qualification Pathways and Employment Opportunities		
Procedure for Recognition of STA Tutors/Examiners		
PTTLS Assignment Marking Template	2013	V13.2
STA Tutor Structure	02 June 2010	V2
SQA Centre Information 2011–2012 (2)		

Document title	Date of issue	Version number
STA Pool Rescue Qualifications Assessment Methodology		
STA Swimming Teaching Assessment Methodology		
Moderation of STA Tutors		
Swimming Teaching Qualification Pathways and Employment Opportunities		
STA Tutor Manual – Foundation Unit	5 June 2009	V1.7
STA Awarding Body Complaints Procedure	2010	V2
Malpractice Policy		
STA Whistleblowing Policy		
Enquiries About Results and Appeals Procedure	2010	
SQA Courses (list of SQA accredited courses delivered)		
STA Lifesaving – Pool Lifeguard Examination Paper		
Certificate Control Book		
Internal Audit Forms (29–30 January 2013)		

Document title	Date of issue	Version number
Probationary FAW T/E Moderation Sheet		
Probationary Examiner Assessment Sheet		
Probationary Moderation Form		
Moderation Form		
Swimming Teachers Marketing Leaflet		
STA Qualification Description and Unit Details Sheets (Pool Lifeguarding)		
STA Unit Level Evaluation Form (2.1) (Pool Lifeguarding)		
Credit and Levelling Sheet (Pool Lifeguarding)		
Allocating an SCQF Level and Credit Points to a Unit (Pool Lifeguarding)		

## 7 Action Plan

A separate document in Microsoft Word has been forwarded with this Audit 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 3  Principle 6	STA must ensure that the same Moderator does not moderate any Tutor/Examiner on more than three consecutive occasions in order to satisfy the requirements of the awarding body's own policy and processes.	Medium		
Principle 8	STA must ensure that the documentation relating to the development and review of all subsequent qualifications is held and that the documentation clearly evidences each stage of STA's revised unit/qualification development and review process.	Medium		

<b>Areas of concern</b>	<b>Requirement</b>	<b>Risk rating</b>	<b>Proposed action</b> <small>(Please include a description of your intended methodology and details of the evidence that will be provided.)</small>	<b>Target date for completion</b>
Principle 22  Regulatory Principles Directive 3	STA must remove the IFSTA logo from the format of the STA candidate certificate in order for SQA Accreditation’s minimum certificate requirements to be met.	Very Low		

**Signatures of agreement of Action Plan**

For and on behalf of Safety Training Awards:

For and on behalf of SQA Accreditation:

**Signature**

**Signature**

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**Date**

**Date**

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## 8 Acceptance of audit findings

For and on behalf of Safety Training Awards:

**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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