



Audit Report

Safe Cert Awards Ltd.

12 June 2014

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1 Background

This was the first audit of SafeCert Awards Ltd, since it was approved as an awarding body by SQA Accreditation on 17 April 2013.

SafeCert is a health and safety training organisation and delivers qualifications in First Aid at Work, Emergency First Aid at Work, Manual Handling, Patient Handling, and Fire Safety. SafeCert's headquarters are situated in Gortin, Omagh.

1.1 Scope

SQA Accreditation carries out quality assurance activity in line with our *Quality Assurance of Approved Awarding Bodies Policy*. This states the type and frequency of our quality assurance activities, describes our reporting procedures and indicates how the awarding body's Quality Enhancement Rating is calculated.

As this was a full audit of SafeCert, all regulatory requirements were included within the scope of the audit. Our quality assurance activities are conducted on a sampling basis and consequently, not all aspects of SafeCert's systems, procedures and performance have been considered in this report to the same depth.

The audit was designed to ensure SafeCert complies with SQA Accreditation's regulatory requirements namely:

- ◆ *SQA Accreditation's Regulatory Principles (2014)*
- ◆ all Regulatory Principles Directives
- ◆ the awarding body's Accreditation Licence

Awarding body documentation considered for review by the Audit Team includes all documents banked on SafeCert's Quicqr place at the time of audit and information supplied to support audit activity. Restricted or commercially sensitive information gathered during SQA Accreditation's quality assurance activities is treated in the strictest confidence.

1.2 Audit Report and Action Plan Timescales

SafeCert audit date:	12 June 2014
Audit Report approved by Accreditation Co-ordination Group on:	23 July 2014
Audit Report to be signed by SafeCert:	4 September 2014
Action Plan to be e-mailed to regulation@sqa.org.uk by SafeCert	4 September 2014

The process will apply in relation to the timescales specified above:

- ◆ The awarding body will be sent two signed copies of the Audit Report by post.
- ◆ The awarding body must sign both copies of the Audit Report and return one by post to SQA Accreditation in accordance with the timescale specified above.
- ◆ The awarding body will also be e-mailed a copy of the Audit Report (for information only) and an electronic copy of the Action Plan.
- ◆ The awarding body must complete and return the Action Plan in accordance with the timescale specified above and e-mail this in Microsoft Word format to regulation@sqa.org.uk.
- ◆ SQA Accreditation will confirm when the Action Plan is appropriate to address the Issues and present it to Accreditation Co-ordination Group (ACG) for approval.
- ◆ Following approval by ACG, the awarding body will be sent two signed copies of the approved Action Plan by post.
- ◆ The awarding body must sign both copies of the Action Plan and return one by post to SQA Accreditation.

The findings of this Audit Report and the associated Action Plan will be published on SQA Accreditation's website following signed agreement.

SQA Accreditation will continually monitor progress towards completion of the proposed actions identified in the Action Plan and update the awarding body's Quality Enhancement Rating as appropriate.

1.3 Summary of Audit Issues and Recommendations

An Issue has been recorded where evidence shows that the awarding body is not compliant with SQA Accreditation's regulatory requirements. The awarding body must address the Issues and specify corrective and preventative measures to address them through its Action Plan.

The Action Plan is e-mailed to SafeCert as a separate document to the Audit Report and must be submitted to SQA Accreditation in accordance with the timescale specified in 1.2.

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

Issue	Detail of Issue recorded	Risk rating
1. Principles 2 and 6	The centre and qualification approval processes which SafeCert currently operates are neither robust nor fit for purpose.	Very High
2. Principle 5	SafeCert has produced a range of SQA accredited qualification marketing and guidance documentation which contains SQA accredited qualification and Unit titles that are incorrect.	Low
3. Principles 6 and 7	SafeCert has not: <ul style="list-style-type: none"> ◆ maintained an appropriate level of communication with SQA Accreditation ◆ maintained the awarding body's Quickr place appropriately to hold current documentation relevant to awarding body operations ◆ provided SQA Accreditation with an approved centre list in the appropriate format 	Medium
4. Principle 10	SafeCert does not have: <ul style="list-style-type: none"> ◆ External Quality Advisor (EQA) guidance documentation in place which would aid in clarifying the role and responsibilities and facilitate standardisation ◆ visit planning forms which are appropriate in format and content to support the EQA visit process 	High
5. Principle 11	The SafeCert <i>Equal Opportunities Policy</i> does not cover all appropriate protected characteristics as required by the Equalities Act 2010 (Specific Duties) (Scotland).	Low

6. Principle 12 and Regulatory Principles Directive 5	The SafeCert <i>Enquiries and Appeals Policy & Procedures</i> document does not meet the requirements of SQA Accreditation's <i>Regulatory Principles Directive 5 – Complaints Handling</i> .	Low
7. Principle 15 and Regulatory Principles Directive 3	The format and content of SafeCert qualification and Unit certificates do not meet the requirements of SQA Accreditation's <i>Regulatory Principles Directive 3 – Logos and certificate requirements for SQA accredited qualifications</i> .	High

A Recommendation has been noted where SQA Accreditation considers there is potential for improvement. The awarding body is advised to address any Recommendations noted as good practice; however, measures to correct or prevent these are not mandatory and therefore do not form part of the Action Plan.

Recommendation	Detail of Recommendation noted
1. Principle 5	<p>SafeCert may wish to review the content of the SafeCert website and all awarding body documentation to ensure that appropriate references are made to:</p> <ul style="list-style-type: none"> ◆ SQA Accreditation as the qualifications regulator in Scotland ◆ SQA Accreditation's <i>Regulatory Principles (2014)</i> ◆ the SCQF and SCQF credit rating.
2. Principle 15	SafeCert may wish to consider printing qualification and Unit certificates on watermarked paper for the purposes of increasing certificate security.

1.4 Risk Rating of Issues

SQA Accreditation assigns a rating to each Issue recorded depending on the impact or risk on the awarding body's operations, its SQA accredited qualifications and/or the learner.

Issues recorded during the audit will count towards SafeCert's Quality Enhancement Rating which will, in turn, contribute towards future quality assurance activity. Further detail on how the Quality Enhancement Rating is calculated can be found on the SQA Accreditation website. <http://www.sqa.org.uk/sqa/42387.2733.html>

2 Detail of Audit Issues and Recommendations

The following sections detail Issues recorded and Recommendations noted against SQA Accreditation's regulatory requirements.

2.1 Issues

Regulatory Principle 2. The awarding body shall ensure it has the necessary resources to effectively carry out its operational functions to meet regulatory requirements.

and

Regulatory Principle 6. The awarding body and its providers shall maintain accurate documents, records and data.

Organisations wishing to become a SafeCert approved centre are required to submit a completed *Centre Approval Form* accompanied by the appropriate evidence in order to satisfy the awarding body's approval criteria. SafeCert's centre approval process states that once the approval documentation has been received, the External Qualification Support Team should then assess the application within five working days. The decision with respect to centre approval should then be communicated to the centre within two further working days.

Part 4 of the *Centre Approval Form* (Policy and Procedural Documents) requires prospective centres to provide copies of documentation relating to the following four categories: Health and Safety Policy, Equal Opportunities Policy, Data Protection Act, and Public Liability Certificate.

Having considered the content of this part of the form, the Accreditation Auditors were of the opinion that by only requesting documentation relating to these four areas, the awarding body would not initially be able to review the content of some key centre-developed policies through the approval process (eg maladministration, complaints) and would therefore be unable to fully assess whether any prospective centre was operating using an appropriate range of policies capable of facilitating a high standard of qualification delivery. Awarding body representatives confirmed to the Accreditation Auditors that centre-developed policies/procedures other than those indicated in Part 4 of the approval form would only be inspected at the first external verification visit to any approved centre, which could take place up to a year after the point of approval (as per SafeCert's *Centre Approval Risk Management Policy*).

Again, with respect to the content of the *Centre Approval Form*, there appeared to be no section giving prospective centres the opportunity to provide information regarding assessment locations and/or satellite sites. SafeCert representatives conceded to the Accreditation Auditors that the form should include a part which would allow prospective centres to provide this information when making an approval application.

On the day of the audit, the Accreditation Auditors requested to view the approved centres' files held by the awarding body for each centre approved to deliver SQA accredited qualifications. The files provided contained the submitted *Centre Approval Form* and associated evidence for each centre. However, on inspection of this approval documentation, a number of issues were identified with respect to how the overall approval process was being carried out by the awarding body.

Across the range of approval forms scrutinised, the main issues identified were that:

- ◆ *Centre Approval Forms* had been submitted by prospective centres with key information omitted yet centre approval had been granted. There was no indication that the External Qualification Support Team had made any attempt to obtain the missing information from the centres in question. For example, one organisation had been granted approval based on an approval form in which they had failed to indicate that they accepted two of the awarding body's terms and conditions of approval.
- ◆ Prospective centres had indicated on the forms that they had included policy documents in support of their application. However, not all copies of these documents were held on file by the awarding body and there was no evidence to indicate that these documents had been checked by the External Qualification Support Team. The Accreditation Auditors identified that some of the policy documentation submitted and accepted by SafeCert was not fit for purpose. For example, one Health and Safety Policy held on file by SafeCert contained minimal detail, made no reference to any current health and safety legislation and contained no information with respect to incident management.
- ◆ Not all copies of qualification certificates or CVs were held on file by SafeCert to confirm the occupational competency of centre assessment and verification staff; and there was no clear indication as to whether or not these had actually been submitted and/or scrutinised by the External Qualification Support Team.

Also, in preparing for the audit activity, the Accreditation Auditors were unable to identify any clear awarding body process which would allow approved centres to apply for approval to deliver qualifications in addition to those originally approved. SafeCert representatives confirmed on the day of the audit that no clear process and/or documentation was in place at that time to facilitate additional qualification approval.

Hence, the centre and qualification approval processes with which SafeCert currently operate are neither robust nor fit for purpose. This has been recorded as **Issue 1**.

Regulatory Principle 5. The awarding body shall provide clear information on its procedures, products and services and ensure that they are accurate and appropriate to SQA accredited qualifications.

SafeCert has produced a range of marketing and guidance documentation with respect to the SQA accredited qualifications that it is approved to offer. However, on inspection of this documentation, a number of errors were identified regarding the Unit and qualification titles which were included. For example, SafeCert has produced a *Candidate Evidence Logbook* which displays a qualification title of *SafeCert SCQF Level 5 Award in Cardiopulmonary Resuscitation and Defibrillation Skills*; however, this is not the SQA accredited title of the award. The correct accredited title is *SafeCert SCQF Level 5 Award in Cardiopulmonary Resuscitation and Defibrillation*.

SafeCert has also produced a qualification specification document for the *SafeCert SCQF Level 6 Award in First Aid at Work*. Page 5 of the document contains details of the two mandatory Units of the qualification; however, Unit UB75 04 is titled as *Recognition and Management of Illness in the Workplace* which is incorrect. The correct SQA accredited Unit title is *Recognition and Management of Illness and Injury in the Workplace*.

SafeCert has also published a product sheet for the *SafeCert SCQF Level 6 Award in First Aid at Work*. One of the sections on this product sheet is entitled Opportunities for Progression and this section contains a possible progression route entitled *SafeCert SCQF Level 6 Award in Recognition and Management of Illness in the Workplace*. This qualification title has never been SQA accredited and is incorrect. The Unit entitled *Recognition and Management of Illness in the Workplace* would appear to have been incorrectly branded as an SCQF Level 6 Award.

Hence, SafeCert has produced a range of SQA accredited qualification marketing and guidance documentation which contains SQA accredited qualification and Unit titles that are incorrect. This has been recorded as **Issue 2**.

Regulatory Principle 6. The awarding body and its providers shall maintain accurate documents, records and data.

and

Regulatory Principle 7. The awarding body shall have effective arrangements for communicating with its staff, stakeholders and SQA Accreditation.

SafeCert was approved by SQA Accreditation as an awarding body on 17 April 2013. Subsequent to that, SQA Accreditation made numerous requests for an approved centre list from SafeCert which the awarding body was unable to meet. One such request was made on 9 January 2014 when SQA Accreditation sent out a general annual request to all approved awarding bodies to provide an updated approved centre list in the required format by 1 March 2014, but SafeCert was unable to provide this information by the stated deadline.

On 22 May 2014, SafeCert uploaded a spreadsheet to the awarding body's Quickr place (a document repository) entitled *Registered Centre – Printout*. The spreadsheet displayed the names and contact details for the centres which SafeCert had approved to deliver SQA accredited qualifications. However, the spreadsheet gave no indication of the specific qualifications that any centre had been approved to deliver, no indication of whether the centre was active/inactive, and no details of the number of candidates that had been registered and certificated by each centre. This information is all required as per the approved centre list format specified by SQA Accreditation.

Also, prior to the audit, the Lead Auditor had requested that SafeCert ensure that the awarding body's allocated Quickr place was populated by 22 May 2014 with all relevant and current documentation which supported awarding operations. SafeCert representatives were unable to meet with this request by the agreed deadline and asked for an extension. However, SafeCert representatives were again unable to meet with this request by the revised deadline and hence not all relevant documentation was available for scrutiny by the Accreditation Auditors prior to the audit activity.

Hence SafeCert has not:

- ◆ maintained an appropriate level of communication with SQA Accreditation
- ◆ maintained the awarding body's Quickr place appropriately to hold current documentation relevant to awarding body operations
- ◆ provided SQA Accreditation with an approved centre list in the appropriate format

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

Regulatory Principle 10. The awarding body shall ensure that it has the necessary arrangements and resources for the effective delivery, assessment and quality assurance of SQA accredited qualifications.

With respect to external quality assurance activity, SafeCert employs EQAs for the purposes of providing support and guidance to prospective centres and for carrying out external verification visits at approved centres. However, in preparing for the awarding body audit activity, Accreditation Auditors could not identify any EQA guidance documentation produced by SafeCert with a view to supporting EQAs in the role and to standardising external verification. SafeCert representatives confirmed on the day of the audit that no such guidance documentation had yet been produced.

Also, the *External Quality EQA Visit Planner* has been produced by SafeCert for the purposes of planning and recording details of external verification visits carried out at approved centres. The format of the document makes provision for the inclusion of previously assigned centre action points, the details of the candidates to be observed at the visits, details of the portfolios to be sampled, and a section for EQA feedback. The format of the *Visit Planner* does not, however, make provision to include the reasons for, and overall nature of, the quality assurance activity undertaken and does not contain any specific section for the identification of action points and associated timescales for completion assigned at the visit.

On inspection of the completed versions of these planning documents held on file by the awarding body for approved centres, it was also apparent that minimal detail of the visit had been entered by the EQAs into the available fields. Accreditation Auditors were of the opinion that the lack of available guidance with respect to the EQA role was responsible for a lack of understanding of what is required in terms of form completion.

SafeCert does not have:

- ◆ EQA guidance documentation in place which would aid in clarifying the role, responsibilities and facilitate standardisation
- ◆ visit planning forms which are appropriate in format and content to support the EQA visit process

This has been recorded as **Issue 4**.

Regulatory Principle 11. The awarding body shall ensure that its qualifications and their assessment are inclusive and accessible to learners.

SafeCert has produced an *Equal Opportunities Policy* the aim of which is to communicate the commitment of the awarding body to the promotion of equality of opportunity. With respect to protected characteristics, however, the policy makes no reference to that of pregnancy, which is required as per the Equality Act 2010 (Specific Duties) (Scotland) to cover SafeCert when operating in Scotland.

Hence, the SafeCert *Equal Opportunities Policy* does not cover all appropriate protected characteristics as required by the Equalities Act 2010 (Specific Duties) (Scotland). This has been recorded as **Issue 5**.

Regulatory Principle 12. The awarding body and its providers shall have open and transparent systems to manage complaints.

and

Regulatory Principles Directive 5 – Complaints Handling

SafeCert has produced a document entitled *Enquiries and Appeals Policy & Procedures* which contains details of the awarding body's processes and the timescales involved when dealing with enquiries, appeals and complaints. However, the document makes no mention of the circumstances under which any candidate or centre may take their complaint to the Scottish Public Sector Ombudsman (SPSO) which is a requirement of SQA Accreditation's *Regulatory Principles Directive 5 – Complaints Handling*.

Hence, the SafeCert *Enquiries and Appeals Policy & Procedures* document does not meet the requirements of SQA Accreditation's *Regulatory Principles Directive 5 – Complaints Handling*. This has been recorded as **Issue 6**.

Regulatory Principle 15. The awarding body and its providers shall have effective, reliable and secure systems for the registration and certification of learners.

and

Regulatory Principles Directive 3 – Logos and certificate requirements for SQA accredited qualifications

Regulatory Principles Directive 3 – Logos and certificate requirements for SQA accredited qualifications outlines SQA Accreditation's regulatory requirements with respect to qualification/Unit certificate content. Prior to the audit, the Accreditation Auditors had been provided with sample copies of SafeCert qualification and Unit certificates. However, on inspection of the samples provided, the following issues regarding format and content were identified, all of which are contradictory to the requirements of *Regulatory Principles Directive 3*:

- ◆ Sample qualification certificates did not contain the assigned qualification Group Award code.
- ◆ The sample certificate provided for the *SafeCert SCQF Level 6 Award in First Aid at Work* contained a statement indicating the certificate was valid for three years from the point of issue as required. However, the certificate also displayed an issue date (24/2/2014) and an expiry date (19/06/2016) and the period between these two dates meant that the validity period was less than the three year period required for the qualification.

Also, although not specifically contradictory to the requirements of *Regulatory Principles Directive 3*, the issue date displayed on some of the samples provided was in American format, whereas the expiry date was not which could lead to confusion over the validity period for the certificate.

Hence, the format and content of SafeCert qualification and Unit certificates do not meet the requirements of SQA Accreditation's *Regulatory Principles Directive 3 – Logos and certificate requirements for SQA accredited qualifications*. This has been recorded as **Issue 7**.

2.2 Recommendations

Regulatory Principle 5. The awarding body shall provide clear information on its procedures, products and services and ensure that they are accurate and appropriate to SQA accredited qualifications.

Through the process of reading through the range of SafeCert documentation available and reviewing the content of the SafeCert website prior to the audit, Accreditation Auditors identified numerous incorrect references with respect to SQA Accreditation and SCQF credit rating.

For example, the webpage entitled *About Us* on the SafeCert website contains a link which is intended to direct users to the SCQF website. However, when clicking on the link, users are directed to a page of the www.accreditedqualifications.co.uk website instead.

Also, numerous references were found throughout the SafeCert documentation and web pages to SQA as the qualification regulator. Strictly speaking, and to avoid any confusion, references should be made to SQA Accreditation as the qualification regulator in Scotland.

Several references are also made through the range of SafeCert documentation available to the SQA Accreditation's *Regulatory Principles (2011)* but these were superseded by the revised *Regulatory Principles (2014)* on 1 April 2014. For example, the Introduction section (Page 2) of the *SafeCert Corporate Governance Manual* refers to 'SQA Accreditation Regulatory Principles (2011) and the Regulatory Principles Directives'.

SafeCert may wish to review the content of the SafeCert website and all awarding body documentation to ensure that appropriate references are made to

- ◆ SQA Accreditation as the qualification regulator in Scotland
- ◆ SQA Accreditation's *Regulatory Principles (2014)*
- ◆ the SCQF and SCQF credit rating

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

Regulatory Principle 15. The awarding body and its providers shall have effective, reliable and secure systems for the registration and certification of learners.

SafeCert qualification and Unit certificates are printed on plain paper which is not watermarked. The fact that the certificates are printed on plain paper and not on watermarked paper, highlights a concern about the design of the certificate to protect against possible fraudulent use.

SafeCert may wish to consider printing qualification and Unit certificates on watermarked paper for the purposes of increasing certificate security. This has been noted as **Recommendation 2**.

3 Acceptance of Audit Findings

For and on behalf of SafeCert Awards Ltd.:

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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