



# **Audit Report**

**The Worshipful Company of Spectacle Makers  
(WCSM)**

**5 June 2014**

## Contents

<b>1</b>	<b>Background</b>	<b>1</b>
1.1	Scope	1
1.2	Audit Report and Action Plan Timescales	2
1.3	Summary of Audit Issues and Recommendations	3
1.4	Risk Rating of Issues	5
<b>2</b>	<b>Detail of Audit Issues and Recommendations</b>	<b>6</b>
2.1	Issues	6
2.2	Recommendations	7
<b>3</b>	<b>Acceptance of Audit Findings</b>	<b>12</b>

# 1 Background

This was the second audit of The Worshipful Company of Spectacle Makers (WCSM) since it was approved as an awarding body by SQA Accreditation on 11 August 2010.

WCSM is a nationally recognised awarding body which provides training for optical technicians and optical practice support staff. It offers nationally recognised qualifications which have been accredited to the Qualifications and Credit Framework for England, Northern Ireland and Wales and credit rated for the Scottish Credit and Qualifications Framework.

WCSM's headquarters are situated in London.

## 1.1 Scope

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

As this was a full audit of WCSM, 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 an awarding body's systems, procedures and performance have been considered in this report to the same depth.

The audit was designed to ensure WCSM 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 WCSM's Quickr 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

WCSM audit date:	5 June 2014
Audit Report approved by Accreditation Co-ordination Group on:	2 July 2014
Audit Report to be signed by WCSM:	14 August 2014
Action Plan to be emailed to <a href="mailto:regulation@sqa.org.uk">regulation@sqa.org.uk</a> by WCSM:	14 August 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 emailed 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 email this in Microsoft Word format to [regulation@sqa.org.uk](mailto: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 emailed to WCSM 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, one Issue has been recorded and five Recommendations have been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principle 6 Regulatory Principles Directive – RPDIR 2	The awarding body must ensure the submission of accurate candidate registration and certification data to SQA Accreditation.	Medium

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	Having no candidates from outwith Scotland for the SQA accredited provision and no intention of making it available outside the UK, WCSM may wish to amend the website fee information to avoid confusion.
2. Principle 5	WCSM may wish to remove the links to previously accredited qualifications, the <i>Award in Supporting the Provision of Contact Lenses in Optical Practice (R097)</i> and the <i>Award in Supporting the Provision of Spectacle Frames in Optical Practice (R098)</i> , that are no longer available.
3. Principle 6	WCSM may wish to revise all relevant guidance and documentation to ensure that there is a consistent and accurate reflection of awarding body operational practice.
4. Principle 10	The awarding body may wish to further clarify its relationship with WCSM Education Trust and formalise the process for reviewing any teaching materials designed and used by the Trust in the support of SQA accredited qualifications.

5. Principle 15	WCSM should endeavour to ensure that all certificates and any other documented references reflect current accredited qualification titles with respect to all SQA accredited provision.
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## 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 WCSM'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 6. The awarding body and its providers shall maintain accurate documents, records and data.**

A pre-audit check of registration and certification data submitted by the awarding body on a quarterly basis indicated that there was a possible inconsistency in the information provided for the *SCQF Level 5 Certificate in Optical Care (R096 04)* across the period April 2011 to March 2014. There appeared to be more certificated candidates in the stated period than had been registered for the qualification.

Across the stated period, WCSM reported to SQA Accreditation a total of 80 candidate registrations and 103 certifications. Discussions during the audit itself suggested a number of reasons for the variance in data.

Firstly, it was possible that the candidates had actually been registered in the period before the data sample checked by the audit team. The late certifications would then possibly be accounted for by the fact that there was a need for candidates to re-sit a number of units before fully completing the award.

However, the awarding body was unable to provide information regarding previous quarterly data submissions on the day of the audit and it was therefore not possible to determine if this was the reason for the variation.

The audit team also raised the possibility that the additional number of certifications were a consequence of the erroneous recording of unit achievement within the quarterly returns. However, awarding body representatives provided an assurance that they were clear that only full qualification achievement should be noted within the certification data.

It was explained that the awarding body only issues full certificates once per year, a practice that is designed to support its award ceremony every October, with only a letter confirming unit achievement being issued to candidates who had yet to complete the full award. This latter process seemed to militate against the inclusion of unit certification within the quarterly returns.

The discussions around this matter resulted in another couple of points that required clarification. Firstly, it was noted that the quarterly returns to SQA Accreditation appeared to show no actual registrations for the award in question after June 2012. This came as a surprise to the awarding body representatives who were of the opinion that WCSM's internal database held candidate registrations after this period.

Secondly, during the description of the annual certification process awarding body representatives noted that only at the point of issuing full certificates (October each year) would they record candidate achievement, with the subsequent information recorded in the quarterly data return for the period of 1 October to 31 December of the relevant year.

However, the evidence of the available quarterly returns to date would suggest that this is not what occurs, with candidate achievement being recorded in quarterly returns covering different parts of the year.

Following the audit, SQA Accreditation's Information Officer re-checked all data submissions relating to the *SCQF Level 5 Certificate in Optical Care (R096 04)* at the behest of the audit team. No further candidate registrations beyond the 80 previously accounted for were identified and the additional 23 certifications remain unexplained.

Therefore, the audit team can only conclude that the current WCSM process for recording the registration and certification of candidates is not sufficiently robust, leading to inaccurate quarterly data returns to SQA Accreditation.

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

## 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.**

WCSM provides details of a range of course and examination fees, dated September 2013, on its website for all available qualifications including those offered through SQA Accreditation.

It was noted that the level of cost varied depending on whether the candidate resides within the United Kingdom (UK), elsewhere in the European Union (EU) or Overseas (O).

In respect of both the *SCQF Level 5 Certificate in Optical Care (R096 04)* and the *SCQF Level 7 Certificate in Optical Care (R212 04)*, it was noted that fees were provided for both categories out with the UK.

The audit team were advised by awarding body representatives that the SQA accredited qualifications had no candidates from outwith Scotland and the awarding body had no intention of making them available outside the UK. Also, the inclusion of fees within the information on the website was an oversight.

WCSM may therefore wish to amend the fee information to remove any costs associated with the award being offered out with the UK to avoid confusion.

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

The website also retains links to two qualifications, the *Award in Supporting the Provision of Contact Lenses in Optical Practice (R097)* and the *Award in Supporting the Provision of Spectacle Frames in Optical Practice (R098)*, which no longer hold SQA accredited status. Both awards were accredited on 11 August 2010 and were withdrawn by WCSM on 7 August 2013 due to no candidate uptake.

Both links are no longer active and therefore do not provide details of either qualification. However, it may be advisable for WCSM to remove the links entirely from the website to avoid any future enquiries.

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

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

The audit team identified inconsistencies in guidance and procedures for the awarding body's assessment and quality assurance practices.

Firstly, the guidance for unit re-sit timescales is different depending upon the source of information. The awarding body's *Examination Handbook & Regulations, August 2013*, notes that candidates will be able to 'retake a unit three times, and only within three years of their first sitting for the examination'. However, the relevant *Qualification Handbook, March 2012*, for both SQA accredited qualifications states that a 'unit can be retaken on its own, at specified times within five years'. To possibly confuse the issue further, the awarding body's website indicates that the re-sit timescale of three years applies only to the *SCQF Level 5 Certificate in Optical Care (R096 04)* with a re-sit timescale of five years applicable to the *SCQF Level 7 Certificate in Optical Care (R212 04)*.

Secondly, the awarding body's standard operating procedure, *SOP 3 Approval of Examination Venues, January 2013*, states that approved examination venues will be subject to an external verification visit 'at least once every three years'. However, the awarding body's *Regulations for Examination Venues, February 2013*, notes that such visits will take place 'at least once every four years'.

Lastly, the awarding body's standard operating procedure, *SOP 4 Procedure for Appointing Examiners & Assessors and for Ensuring Fair Assessment, January 2013*, states that the awarding body's Administrator will 'maintain a log of all enquiries, complaints and appeals lodged by candidates showing the examiner concerned and the outcome in each case. This will be reviewed annually by the Qualification Committee'.

On requesting access to this log, awarding body representatives stated that it did not exist. It was explained that no such log has ever existed as the team of examiners involved with the SQA accredited qualifications is so small that it was a simple process to track any enquiries, complaints and appeals should the need arise.

With all of the above in mind, WCSM may wish to revise all relevant guidance and documentation to ensure that there is a consistent and accurate reflection of awarding body operational practice.

This has been noted as **Recommendation 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.**

As an awarding body, WCSM considers itself solely and only responsible for the examination process used to assess its portfolio of qualifications. The organisation's website states that candidates 'may prepare themselves for the examinations leading to the WCSM's Awards in any way they choose'.

This position is endorsed by the WCSM *Examination Handbook & Regulations, August 2013*, which states that success 'in all examinations set by the Worshipful Company of Spectacle Makers (WCSM) calls for an understanding of the theories governing optical manufacturing and optical practice. It is entirely a matter of personal choice how those wishing to acquire a WCSM qualification prepare themselves for the examination'.

However, the awarding body does reference an option for 'preparatory training' as an enhancement to experience gained through employment should candidates feel the latter is insufficient. The website notes that for 'those with no local source of training, the WCSM Education Trust runs a series of distance learning and blended learning courses, starting at various times throughout the year'.

The audit team sought clarification on the status and role of the WCSM Education Trust in SQA accredited provision. The awarding body representatives advised that the Trust was a 'separate legal entity' which operates independently from the awarding body.

However, the audit team noted that the Bulletin Board section of the WCSM website indicated that 'NHS Education for Scotland will continue to provide support for Optical Assistants' development in 2014 through Optical Care training and qualification programmes at both Level 5 and Level 7'. The training itself 'being conducted under the auspices of the WCSM Education Trust', providing 'Optical Assistants with the background knowledge' through 'a distance learning programme supplemented by training workshops'.

The audit team, believing this to be indicative of close working relationship over the delivery and assessment of the SQA accredited provision, requested information on how the awarding body assured itself of the appropriateness of the teaching methods and materials to the qualification syllabuses.

The awarding body representatives reiterated that they considered the Trust to be a separate entity and had no formal role of checking teaching methods and materials. They also noted that they do not plan to monitor any of the advertised seminars in support of the SQA qualifications.

It was stated that the WCSM's Clerk attended committee meetings alongside Trust members, which presented an opportunity to be informally appraised of any changes or issues surrounding training.

However, post-audit checks noted that the Trust is a company limited by guarantee and holds charitable status. Also, it was found that the awarding body's current Clerk was identified as the Company Secretary of WCSM Education Trust in the Trustees' Report for the year ended 31 March 2013.

This would indicate that there is a firmer and more defined relationship between the awarding body and the Trust than has so far been established. This is particularly apparent as a stated objective in the published Trustees' Report is:

*The establishment and maintenance of examinations in the field of optics on behalf of the awarding body, The Worshipful Company of Spectacle Makers.*

Given the fact that NHS Scotland funds the full training package and examinations offered by the Trust in support of SQA accredited provision, thereby making candidate participation mandatory, published statements to the effect that the awarding body is only responsible for the examination process are not strictly accurate given the information provided by the Trustees' Report.

The lack of any formal process for reviewing the activities of the Trust in support of SQA accredited qualifications potentially leaves the awarding body open to reputational risk should candidates formally lodge a complaint in respect of the training programmes

Therefore, the awarding body may wish to further clarify its relationship with WCSM Education Trust and formalise the process for reviewing any teaching materials designed and used by the Trust in the support of SQA accredited qualifications.

This has been noted as **Recommendation 4**.

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

A check of certificate templates for WCSM accredited qualifications identified the fact that the reference to SCQF within the qualification titles had accidentally been omitted, in respect of the *SCQF Level 5 Certificate in Optical Care (R096 04)*. This resulted in the certificates not adequately reflecting the current accredited qualification title.

This was a simple oversight that occurred when the certificate templates were revised as a consequence of an action raised within the last centre monitoring report, dated December 2013, regarding the use of an incorrect qualification logo.

Initially, the audit team considered recording the incorrect certificate template as an Issue. However, no candidates have been certificated using the erroneous template and the awarding body corrected the mistake on the day of the audit.

WCSM should endeavour to ensure that all certificates and any other documented references reflect current accredited qualification titles with respect to all SQA accredited provision.

This has been noted as **Recommendation 5**.

### 3 Acceptance of Audit Findings

For and on behalf of The Worshipful Company of Spectacle Makers:

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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