

Summary of Improvement Actions

SQA operates an embedded ethos of Continuous Improvement (CI) and encourages staff to identify opportunities for CI. These opportunities arise from a variety of sources as well as situations, including the regular review of our processes, responding to any situations that arise that identify opportunities for improvement, new staff bringing in new skills and perspectives, customer feedback, and adverse situations causing us to review our practices. At the point that issues became identified with the HSCE qualification, several actions were progressed to prevent further malpractice, as well as to enhance the existing malpractice process. This activity is detailed below.

A project has also been set up to progress actions required to fully comply with the CASS requirements by the September 2021 deadline. Whilst many of the requirements by Ofqual with the introduction of CASS are already in place, there are some elements which requires changes to technology and process which are currently being implemented. Until this project is completed, SQA flags any proposals for new qualifications for the Ofqual regulated market at the Business Case Group, which approves new developments. Work is then conducted to ensure that there are no risks to compliance with Condition H2.

SQA will also consider any further implications resulting from Ofqual's reported findings. If these can be included in the project to comply with CASS (where these not already addressed by the scope of the CASS requirements), they will be – however, our ability to do this will be dependent on the timing of the Ofqual report, which we expect Ofqual will recognise.

Improvements

The Malpractice Investigation Process

1. The document: "Malpractice: Information for Centres" was revised from April 2018 to include mention that Revocation of Certificates could be a result of malpractice findings. Prior to this, SQA lawyers advised that legal challenge could be brought if revocation was applied without being documented as a potential outcome of investigation findings.
2. The process for certificate revocation following a malpractice finding was formalised, which includes responsibility for the Malpractice panel to make a judgement on each unique case.
3. A further scheduled review of the document: "Malpractice: Information for Centres" took place and a revised version was published in December 2020. This resulted in minor changes to ensure clarity.
4. Additional considerations are being included in the project set up to ensure compliance with CASS requirements by Sept 2021.
5. In Sept 2018, colleagues from SQA's Operations team and Malpractice team were given direct access to the SOLAR platform with further training on use of SOLAR up to March 2019. This allows team members to directly monitor risks from centre data patterns and to more easily and quickly obtain data for investigations.

Notifications to Ofqual:

1. The Event Notifications process was revised in April 2018, following detailed discussions with members of Ofqual's Standards team (Phil Beach and Claire Tennant). The changes made were to ensure that Notifications are provided to Ofqual at the point agreed between Ofqual and SQA at that meeting (at the stage where SQA Screening Panel makes the decision to move to a malpractice investigation).

Improvements to prevention of malpractice

1. In February 2019, SQA implemented new approval and Quality Assurance requirements for centres delivering online assessments. This includes centres being subject to unannounced SQA quality assurance visits and centres being required to advise SQA in advance the of dates of assessment. Previously SQA always had the option of carrying out unannounced visits; however, did not have the advance notice of assessments taking place for Regulated qualifications (excluding EPAs which use one set assessment window per month for the online component).
2. These arrangements are currently applied to the only remaining Ofqual Regulated qualification with online assessment (603/3979/2 - SQA Level 2 Certificate in Introduction to the Role of the Professional Taxi Driver and Private Hire Driver).
3. The CASS project will ensure these requirements cover any new online assessed products and any other qualification which we deem to be high risk through our risk assessment.
4. The Recognition route for approval was removed from the HSCE qualification in early 2019 and then completely for all Regulated Qualifications in January 2020. Whilst there was no evidence that malpractice was more likely to occur when centres had used the recognition route, on review of the process we felt that centres were not given the same level of support and therefore were at a disadvantage.
5. The pre-Approval Due Diligence process was further enhanced in March 2019. A new form was created to be completed with the following additional checks: Enhanced viability checks; Director checks including associated companies & partnership delivery; and Web/media search (SQA does not deliver Ofqual regulated qualifications internationally; however, the checks also include country appraisals, including human rights (for overseas centres). These forms are submitted to a Due Diligence panel for approval prior to the application proceeding.
6. SQA also removed the fixed paper assessment option from HSCE qualifications in March 2019, implementing a question bank approach before withdrawing the HSCE qualification completely in May 2019. Extra resources were also allocated to monitor centre activity during the run-out period, alongside a communications plan to notify the withdrawal and offer support to centres.
7. SQA also implemented a manual check to compare and confirm candidate results entered in SOLAR and APS. This continues for the remaining Ofqual regulated Taxi

qualification and other non-regulated qualifications and a systems proposal is being considered to enable automation between the two systems.

8. New guidance on Conditions of Online and Paper assessment were published in August 2020. These are as a subset of Qualifications Verification criteria 4.4 and are also referred to in the Guidance for Qualification Verification issued to centres and Qualification Verifiers. SQA approved centres are not permitted to enter candidate results and/or request certification for candidates. Centres must provide SQA with assessment dates in advance and SQA will then allow the entries to be made. Assessment may also be subject to an unannounced verification visit from SQA.
9. Work is progressing to further define what makes a qualification high risk. Some work has already been progressed on existing qualifications. Further considerations are being taken forward through the CASS project.
10. In addition to the new minimum requirements from Ofqual, the CASS compliance project also includes significant systems development, which will increase our ability to monitor analyse and respond to data.
11. SQA is currently working on a technical solution to enable the APS system to hold candidate e-mail addresses. This will be required from the centre and provide an alternative candidate contact method for SQA, in order for a further direct point of contact to be collected and held.
12. Our current qualification and systems verification selection process is under review and we expect to move from a scheduled selection process several times a year to a more fluid process which should see ongoing selections throughout the year. We intend this to be implemented in September 2021.
13. We are further reviewing our systems verification process to consider the frequency of visits and ongoing support and development for centres. This work is part of our QA Redesign project. We intend this to be implemented in September 2021.