



Audit Report

Smart Awards

23 November 2023

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1 Background

This was the second audit of Smart Awards since it was approved as an awarding body by SQA Accreditation on 5 December 2018.

Smart Awards is an awarding body and end-point assessment organisation predominately dedicated to the telecommunication, construction, digital and utility sectors.

Smart Awards' headquarters are now in Kenilworth, Warwickshire.

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, describes our reporting procedures, and indicates how the awarding body's Quality Enhancement Rating is calculated.

As this was a scoped and remote audit of Smart Awards, focusing upon amendments to the assessment, invigilation and quality assurance of SQA accredited provision, only specific regulatory requirements were included in the scope of the audit. Our quality assurance activities are conducted on a sampling basis and, consequently, not all aspects of the awarding body's systems, procedures and performance have been considered in this report to the same depth.

SQA Accreditation audit reports are written by exception focusing only on those areas where corrective action is required or recommended. Consequently, this approach to audit reporting does not detail areas where compliance or good practice was found.

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

- ◆ *SQA Accreditation Regulatory Principles (2021)*
- ◆ all *Regulatory Principle Directives*
- ◆ the awarding body's Accreditation Licence

Awarding body documentation considered for review by the Audit Team includes all documents banked on Smart Awards' SharePoint site 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

Smart Awards audit date:	23 November 2023
Audit Report approved by Accreditation Co-ordination Group on:	17 January 2024
Audit Report to be signed by Smart Awards:	28 February 2024
Action Plan to be emailed to regulation@sqa.org.uk by Smart Awards:	28 February 2024

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

- ◆ The awarding body will be sent a signed copy of the Audit Report by email.
- ◆ The awarding body must sign the copy of the Audit Report and return by email to SQA Accreditation in accordance with the timescale specified above.
- ◆ The awarding body will also be emailed a 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.
- ◆ 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 a signed copy of the approved Action Plan by email.
- ◆ The awarding body must sign the copy of the Action Plan and return by email 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 Smart Awards 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. Principles 5 and 17	Smart Awards must review its approach to appeals linked to centre recognition to ensure that there are no unnecessary formal complaints to the awarding body or the qualification regulator because of the current approach.	Low

A Recommendation has been noted where SQA Accreditation considers there is potential for enhancement. The awarding body is advised to address any Recommendations in order to reinforce ongoing continuous improvement. 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. Principles 5 and 12	Smart Awards may wish to amend the contradiction around the prerequisite age requirements for learners, specified in the Qualification Handbooks for both SA001 Overhead Safety, 638 04, and SA002 Underground Safety, 639 04, at the earliest opportunity.
2. Principles 5 and 13	Smart Awards may wish to amend and revise the current <i>Centre Assessment Standards Scrutiny (CASS) Policy</i> to ensure that the mandatory requirements for personnel undertaking internal quality assurance are clearly and accurately detailed in respect of SQA accredited provision.
3. Principles 5 and 13	Smart Awards may wish to consider amending the current Invigilation Guide for Centres to include a definition of a suitably qualified Invigilator and provide information on what the awarding body considers to be the essential aspects of a training programme to support the role.
4. Principle 12	Smart Awards may wish to take a more proactive approach to support English language testing, through the provision of formal guidance, which will ensure that awarding body requirements are met and a more standardised approach to such testing will be undertaken across all centres.
5. Principle 17	<p>A review of the awarding body's <i>Appeals Policy, Doc 70156.7, 1 March 2023</i> noted that the policy does not make it clear that 'SQA Accreditation is unable to overturn assessment decisions or academic judgements' as required by the Supplementary Information linked to the Regulatory Principle.</p> <p>Smart Awards may wish to ensure that the policy is amended to reflect the role of SQA Accreditation in respect of appeals at the earliest opportunity.</p>

1.4 Risk Rating of Issues

SQA Accreditation assigns a rating to each Issue recorded, depending on the impact on or risk to the awarding body's operations, its SQA accredited qualifications and/or the learner. Issues recorded during the audit will count towards Smart Awards 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](#).

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 5. The awarding body and its providers must provide clear information on their procedures, products and services and ensure that they are accurate and appropriate to accredited qualifications.

and

Regulatory Principle 17. The awarding body and its providers must have clear, fair and equitable systems, policies and procedures to manage appeals.

The awarding body's *Centre Handbook – Guidance for Centres, Version 70403.3, 1 June 2023 (Public)* notes under Clause 3.22 that 'there is no right of appeal against the outcome of centre recognition'.

Awarding body representatives noted that such instances will be rare, but if they arise, time is given to explaining the rationale behind the decision not to grant recognition. This approach is confirmed by Clause 3.22, which notes that such decisions 'will be thoroughly explained' to applicants.

While acknowledging that this is good practice, the Audit Team would contend that the lack of opportunity to appeal may result in applicants raising a complaint to either the awarding body or the qualification regulator in such scenarios.

A review of the awarding body's *Appeals Policy, Doc 70156.7, 1 March 2023* noted that under Stage 1 of the appeals process, an applicant can raise an enquiry around a range of awarding body decisions, which includes centre recognition. This would appear to be the trigger point for any thorough explanation behind a decision to reject a request for centre recognition. However, Stage 2 confirms that there is no scope for the applicant to subsequently make a formal appeal around a refusal to grant centre recognition.

Therefore, Smart Awards must review its approach to appeals linked to centre recognition to ensure that there are no unnecessary formal complaints to the awarding body or the qualification regulator because of the current approach.

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

2.2 Recommendations

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

and

Regulatory Principle 12. The awarding body and its providers must ensure that they have the necessary arrangements and resources required to manage and administer qualification delivery and assessment.

The available Smart Awards Qualification Handbooks for the accredited qualifications, SA001 Overhead Safety, 638 04, and SA002 Underground Safety, 639 04, contained the following statement under the heading of 'Prerequisites':

There are no formal entry requirements and Smart Awards will not restrict access on the grounds of prior academic attainment, age, employment, geographic location, or any other grounds. There are no barriers that restrict access or progression, thereby promoting equality.

However, both handbooks also contained the following statement under the heading of 'Age Limit':

This qualification is available to anyone over the age of 16 who can reach the required standard. There are no barriers that restrict access or progression thereby promoting equal opportunity.

The Audit Team would contend that there is a contradiction between the two statements in respect of age and, although of minor impact, Smart Awards may wish to amend and clarify the position at the earliest opportunity.

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

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

and

Regulatory Principle 13. The awarding body and its providers must ensure that they have systems and processes which ensure the effective quality assurance of accredited qualifications.

The Audit Team noted that awarding body documentation such as the Assessor Guides and Centre Handbooks no longer outlined Assessor, Internal Quality Assurer and External Quality Assurer occupational competence, continual professional development (CPD) and qualification requirements.

A review of the awarding body's *Centre Assessment Standards Scrutiny (CASS) Policy, 70149.8, 1 March 2023 (Public)* indicated that much of this information was now held within this document, specifying the requirements for all three assessment and quality assurance roles.

However, while it was clearly noted that there are mandatory qualification requirements for both Assessors and External Quality Assurers, the Audit Team noted that the achievement of specified qualifications was only described as 'best practice'.

As the Audit Team sought a rationale for this position, awarding body representatives noted that this is not the position for centre staff undertaking internal quality assurance of the SQA accredited qualifications SA001 Overhead Safety, 638 04, and SA002 Underground Safety, 639 04. In such cases, it is a mandatory requirement to hold, or be working towards, internal quality assurance qualifications.

Therefore, Smart Awards may wish to amend and revise the current *CASS Policy* to ensure that the mandatory requirements for personnel undertaking internal quality assurance are clearly and accurately detailed in respect of SQA accredited provision.

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

The Smart Awards *Invigilation Guide for Centres, 69954.5, 1 March 2023 (Public)* states that all 'Smart Awards online assessments must be invigilated in accordance with Smart Awards requirements'.

Noting that the role of the Invigilator is key to ensure 'the integrity of the test process', the document states that 'Invigilators will be suitably qualified and trained to complete the invigilation efficiently'.

However, beyond familiarity with the invigilation guide itself, it was difficult for the Audit Team to determine what Smart Awards considered as a suitably qualified Invigilator. Equally, there appeared to be no guidance in respect of Invigilator training.

Therefore, Smart Awards may wish to consider amending the current Invigilation Guide for Centres to include a definition of a suitably qualified Invigilator and provide information on what the awarding body considers to be the essential aspects a training programme to support the role.

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

Regulatory Principle 12. The awarding body and its providers must ensure that they have the necessary arrangements and resources required to manage and administer qualification delivery and assessment.

The aforementioned Smart Awards Qualification Handbooks for the accredited qualifications, SA001 Overhead Safety, 638 04, and SA002 Underground Safety, 639 04, note that an 'Initial and diagnostic assessment of each learner should be conducted before the start of their training to ensure they are working at the correct level, and that specific skills in need of development is clearly identified'.

It is recommended such initial assessments form part of a wider induction programme aimed at ensuring that learners fully understand:

- ◆ the requirements of the qualifications
- ◆ their responsibilities as a learner
- ◆ the responsibilities of the centre
- ◆ any possible progression routes
- ◆ testing of English language skills

During the audit, discussions with awarding body representatives confirmed that the nature, content, and format of any tests of English language skills are solely left at the discretion of centre personnel.

Smart Awards may wish to take a more proactive approach to support English language testing, through the provision of formal guidance, which will ensure that awarding body requirements are met and a more standardised approach to such testing will be undertaken across all centres.

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

Regulatory Principle 17. The awarding body and its providers must have clear, fair and equitable systems, policies and procedures to manage appeals.

A review of the awarding body's *Appeals Policy, Doc 70156.7, 1 March 2023* noted that the policy does not make it clear that 'SQA Accreditation is unable to overturn assessment decisions or academic judgements' as required by the Supplementary Information linked to the Regulatory Principle.

Therefore, Smart Awards may wish to ensure that the policy is amended to reflect the role of SQA Accreditation in respect of appeals at the earliest opportunity.

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

3 Acceptance of Audit Findings