



Provider Monitoring Report

Alcohol Focus Scotland (AFS)

27 September 2022

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1 Background

One provider was remotely monitored on 27 September 2022.

1.1 Scope

SQA Accreditation carries out quality assurance activity in line with its *Quality Assurance of Approved Awarding Bodies Policy*. This involves monitoring a sample of the awarding body's approved providers or assessment sites. Provider monitoring visits will be conducted in a consistent manner within and between providers.

The aim of monitoring is to:

- ◆ ensure the awarding body's compliance with SQA Accreditation's regulatory requirements
- ◆ confirm that quality assurance arrangements are being conducted by the awarding body in accordance with its prescribed arrangements
- ◆ ensure that quality assurance arrangements are being conducted in a consistent manner, within and between providers
- ◆ ensure that providers are receiving the appropriate guidance, support and documentation from the awarding body in order to facilitate a high standard of qualification delivery
- ◆ inform future audit and monitoring activity for the awarding body

All Principles may be included within the scope of the provider monitoring activity.

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

SQA Accreditation provider monitoring reports are written by exception focusing only on those areas where corrective action is required or recommended.

1.2 Provider Monitoring Report Timescales

AFS provider monitoring date: 27 September 2022

Provider Monitoring Report approved by
Accreditation Co-ordination Group on: 16 November 2022

Provider Monitoring Report to be signed by AFS: 9 January 2023

Action Plan to be emailed
to regulation@sqa.org.uk by AFS 9 January 2023

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

- ◆ The awarding body will be sent a copy of the Provider Monitoring Report by email.
- ◆ The awarding body must sign the copy of the Provider Monitoring 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 Action Plan and return by email to SQA Accreditation.

The findings of this Provider Monitoring 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 Provider Monitoring 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 AFS as a separate document to the Provider Monitoring Report and must be submitted to SQA Accreditation in accordance with the timescale specified in 1.2.

As a result of the provider monitoring activity, eight Issues have been recorded and one Recommendation has been noted.

Issue	Detail of Issues recorded	Risk rating
1. Principle 5	In reviewing both the AFS website and the <i>Licensing Board Members' Qualification at SCQF level 6: Alcohol Focus Scotland Assessment Methodology</i> (April 2022), it was unclear to the Accreditation Auditor if candidates had to re-sit within the 12-week window after appointment, or within 12 months of sitting the assessment.	Medium
2. Principle 9	Provider 1 has not complied with <i>AFS Awarding Body Regulations</i> (August 2022) which specify that video recordings associated with the exam are to be retained for five years.	High
3. Principle 12	<p>Provider 1 was unable to provide the Accreditation Auditor with copies of <i>Licensing Board Members' Qualification</i> certificates for both of its new tutors. It also could not provide a completed tutor observation record for one of its new tutors to confirm they had been observed in their first year of delivery.</p> <p>The Accreditation Auditor was unable to confirm that Provider 1 had complied with <i>AFS Internal Quality Assurance Strategy</i> when inducting new tutors.</p>	Medium
4. Principle 13	Provider 1 was unable to provide the Accreditation Auditor with annual Continuous Professional Development (CPD) records for one tutor and one internal verifier.	Low

	<p>The Accreditation Auditor was therefore unable to confirm that that the provider had complied with the requirements for CPD, as specified in both the <i>Assessment Strategy Licensing Board Members' Qualification</i> (Approved by ACG on 30 March 2022) and the <i>Licensing Board Members' Qualification at SCQF level 6: Alcohol Focus Scotland Assessment Methodology</i> (April 2022).</p>	
5. Principle 13	<p>AFS had not quality assured the assessment or delivery of the Licensing Board Members' training courses, including sampling of tutors delivering the training courses. External quality assurance should have been scheduled to take place during the bulk period of delivery of the <i>Licensing Board Members' Qualification</i>.</p> <p>At the time of the provider monitoring activity, AFS had not appointed an External Quality Assurer or undertaken any external quality assurance.</p> <p>AFS has not complied with the external quality assurance requirements specified in the <i>Assessment Strategy Licensing Board Members' Qualification</i> (Approved by ACG 30 March 2022).</p>	Very High
6. Principle 14	<p>The <i>Equal Opportunities Policy</i> given to the Accreditation Auditor by Provider 1 prior to the remote provider monitoring activity was aimed at employees instead of candidates.</p>	Low
7. Principle 14	<p>At the time of the remote provider monitoring activity, Provider 1 explained to the Accreditation Auditor that they had been notified of a reasonable adjustment required for the delivery and assessment of the <i>Licensing Board Members' Qualification</i> on 20 June and 23 June 2022. It was for a candidate who was profoundly deaf.</p> <p>Provider 1 failed to alert the third-party, who deliver the online exam using remote invigilation technology, of the need for a reasonable adjustment for the candidate when the online exam was booked with them. Therefore, the third party was unaware that one of the candidates due to sit the exam on 20 June 2022 had hearing difficulties.</p> <p>The Accreditation Auditor could see no good reason why the online supervisor from the third</p>	High

	party had to ask if the learner was deaf or complete a check around his ears, particularly when the third party had confirmed to Provider 1 that their remote invigilation team had been advised of the reasonable adjustment to use the chat box functionality with this candidate who was profoundly deaf. This could have been avoided and any embarrassment or irritation felt by the candidate mitigated.	
8. Principle 15	AFS has not complied with its own timescale for issuing certificates as specified in the <i>AFS Centre Guidance Licensing Board Members' Qualification</i> (April 2022).	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	Details of Recommendation noted
1. Principle 13	<p>AFS should consider adding a section to its <i>AFS External Verification Report Template</i> to clearly record any required action points, advisory actions or suggestions for improvements, to include:</p> <ul style="list-style-type: none"> • a member of staff responsible for addressing the actions • what action to be taken and a date for completion • date action has been implemented

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 provider monitoring will count towards AFS'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](#).

2 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.

The Accreditation Auditor noted that on AFS's website, it states in the *Licensing Board Members' Training 2022 Session Booking Form*, under 'Exam re-sits':

'Course participants who fail the assessment are permitted one re-sit opportunity. This must be taken within the 12-week window after appointment. Candidates who do not pass the assessment on the re-sit must attend the full course again before being allowed to re-take the assessment. Please note additional charges apply.'

However, in the *Licensing Board Members' Qualification at SCQF level 6: Alcohol Focus Scotland Assessment Methodology* (April 2022), page 3, under 'Examination Procedures':

'Candidates who fail the Licensing Board Members' exam are permitted one re-sit opportunity. This must be taken within 12 months of the date of sitting the assessment. Individuals who do not pass the exam on the re-sit must attend the full course again before being allowed to re-take the assessment.'

In reviewing both AFS's website and *Licensing Board Members' Qualification at SCQF level 6: Alcohol Focus Scotland Assessment Methodology* (April 2022), it was unclear to the Accreditation Auditor if candidates had to re-sit within the 12-week window after appointment, or within 12 months of sitting the assessment.

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

Regulatory Principle 9. The awarding body and its providers must maintain accurate documents, records and data.

The majority of candidates who completed the *Licensing Board Members' Qualification* were assessed by AFS's online exam using remote invigilation technology, delivered through the third-party.

AFS's Awarding Body Regulations (August 2022), page 6, states:

'Alcohol Focus Scotland centres must keep a record of:

- ◆ *the seating plan for the exam, showing where candidates sat in relation to each other, and*
- ◆ *the invigilator*

- ◆ *all video recordings associated with the exam to be retained*

These records must be kept for five years. These records may be required in the event of an investigation concerning any candidate's identity. Access to these records will be given to the nominated External Quality Verifier as required.'

The Accreditation Auditor was notified by email from AFS on 7 July 2022, that the third party had advised them that they delete video recording after six weeks of candidates being assessed for the Licensing Board Member online exam. The third party informed AFS that they could extend the length of time that video recordings are retained, but there would be a cost implication attached to this.

At the time of the provider monitoring activity, Provider 1 confirmed to the Accreditation Auditor that the third party retains video recordings of AFS's online exam using remote invigilation technology, delivered through the third-party for six weeks after the Licensing Board Members' exam. AFS had decided not to extend the length of time video recording are retained by the third party.

This decision impacts access to records available for internal quality assurance and for AFS's External Quality Assurer, when appointed to sample and quality assure. Particularly because all Licensing Board Members are required to complete the *Licensing Board Members' Qualification* within three months of being elected to a licensing board. The bulk of the *Licensing Board Members' Qualification* training took place within three months after the local government elections on 5 May 2022 in Scotland, when newly elected members were appointed to the Licensing Board.

Provider 1 has not complied with AFS Awarding Body Regulations (August 2022) which specifies that video recordings associated with the exam are to be retained for five years.

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

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.

AFS's Internal Quality Assurance Strategy (August 2022), page 5, under 'Tutor Induction' states:

*'New Tutors will be expected to complete and pass the qualification initially' and
'New tutors will be observed in their first year of delivery.'*

Provider 1 was unable to provide the Accreditation Auditor with copies of *Licensing Board Members' Qualification* certificates for both of its new tutors. Nor could they provide a completed tutor observation record for one of its two new tutors confirming that all new tutors had been observed in their first year of delivery.

The Accreditation Auditor was unable to confirm that Provider 1 had complied with *AFS's Internal Quality Assurance Strategy* for the induction of new tutors.

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

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 *Assessment Strategy Licensing Board Members' Qualification* (Approved by ACG 30 March 2022), page 7, under 'Continuous Professional Development (CPD)', states:

'To maintain high standards of quality and standardisation in training and assessment, and achieve best practice, the Scottish Government require all tutors and external verifiers to maintain a record of their CPD. CPD is necessary to ensure tutors and external verifiers maintain an up to date understanding of the occupational area being assessed, and it can be achieved in a variety of ways. Tutors and external verifiers should select CPD methods that are appropriate to meeting their development needs. However, it should be a planned process and reviewed on an annual basis.'

In addition, the *Licensing Board Members' Qualification at SCQF level 6: Alcohol Focus Scotland Assessment Methodology* (April 2022), page 4, under 'Continuous Professional Development', states:

'AFS requires all tutors, internal verifiers and external verifiers to maintain an annual record of their CPD. Centres are required to submit an annual CPD form for each member of staff involved in the delivery and assessment of the qualification to AFS for assessment and record. AFS provides guidance on the annual CPD requirements in the AFS Awarding Body Regulations and Centre Guidance. AFS provides a standardised CPD record form to all Centres for the purposes of the annual CPD check. AFS uses a standardised assessment form to check annual CPD records against the requirements set out in the Delivery & Assessment Strategy for the qualification. Centres are provided with feedback on annual CPD, and records are held on file for external verification purposes.'

Provider 1 was unable to provide the Accreditation Auditor with annual CPD records for one tutor and one internal verifier.

The Accreditation Auditor was therefore unable to confirm that the provider had complied with the requirements for CPD as specified in both the *Assessment Strategy Licensing Board Members' Qualification* (Approved by ACG 30 March 2022) and the *Licensing Board Members' Qualification at SCQF level 6: Alcohol Focus Scotland Assessment Methodology* (April 2022).

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

The *Assessment Strategy Licensing Board Members' Qualification* (Approved by ACG 30 March 2022), page 9, under 'External Quality Assurance', states:

'Awarding Bodies must make one visit to Centres delivering the training and the exam in a 12-month period to ensure they are meeting the requirements of this Delivery and Assessment Strategy and the Awarding Body's own requirements for the delivery of SQA Accredited qualifications. It should be noted that Licensing Board Members' Qualification delivery follows a five-year cyclical pattern, with the bulk of training delivery in the five-year period taking place immediately following Local Government elections in Scotland, when newly elected members are appointed to the Licensing Board. It would be advisable for Awarding Bodies to ensure that External Quality Assurance is scheduled to fall during this intensive delivery period every five years.'

Provider 1 confirmed that they had not received an external quality assurance visit since 9 December 2020 (approximately 22 months).

AFS had not quality assured the assessment or delivery of the Licensing Board Members' training courses, including sampling of tutors delivering the training courses. External quality assurance should have been scheduled to take place during the bulk period of delivery of the *Licensing Board Members' Qualification*. At the time of the provider monitoring activity, AFS had not appointed an External Quality Assurer or undertaken any external quality assurance.

As per Issue 2, Provider 1 informed the Accreditation Auditor that the third party only retained video recordings for six weeks after the Licensing Board Members' exam for AFS's online exam using remote invigilation technology, which is delivered through the third-party. This impacts access to records for AFS's External Quality Assurer, whenever they are appointed to sample and quality assure. Especially as all Licensing Board Members are required to complete the *Licensing Board Members' Qualification* within three months of being elected to a licensing board. The bulk of the *Licensing Board Members' Qualification* training takes place within three months after the local government elections on 5 May 2022 in Scotland, when newly elected members were appointed to the Licensing Board.

AFS has not complied with the external quality assurance requirements specified in the *Assessment Strategy Licensing Board Members' Qualification* (Approved by ACG 30 March 2022).

This has been recorded as **Issue 5**.

Regulatory Principle 14. The awarding body and its providers must ensure that its qualifications and their delivery and assessment are fair, inclusive and accessible to learners.

In reviewing the Equal Opportunities policy given to the Accreditation Auditor by Provider 1 prior to the remote provider monitoring activity, it was apparent that this policy was aimed at employees and not candidates.

This has been recorded as **Issue 6**.

AFS's *Reasonable Adjustments and Special Considerations* (April 2021) states:

'AFS recognises a reasonable adjustment as a pre-assessment agreed adjustment made to mitigate the effect of a disability or difficulty that disadvantages the learner in terms of the assessment. Examples include providing assistance during assessment: such as a sign language interpreter.'

On page 11 of AFS's *Awarding Body Regulations* (August 2022), it states:

'Reasonable adjustments of extra time for the exam and/or the application of style sheets to adjust for dyslexia or low vision can be applied to the third party remote invigilated assessments. Centres should discuss options for adjustments with AFS when candidates are registered, and a decision about the suitability of the remote invigilated assessment will be taken. Candidates deemed to require further or different adjustments than are provided by the third party will be offered an alternative mode of assessment in line with AFS Reasonable Adjustments and Special Consideration Policy.'

At the time of the remote provider monitoring activity, Provider 1 explained to the Accreditation Auditor that they had been notified of a reasonable adjustment required for the delivery and assessment of the *Licensing Board Members' Qualification* on 20 June and 23 June 2022 for a candidate who was profoundly deaf.

Although the reasonable adjustment had not been noted on the training booking form, Provider 1 had been made aware of the candidate's support needs via email from the local council on 13 June 2022, and it had been agreed during a Microsoft Teams meeting that the local council member's service would arrange for a British Sign Language (BSL) interpreter for the candidate. The need for support was discussed to cover both the training delivery and entry to the online exam using remote invigilation technology, delivered through the third-party.

Two BSL interpreters joined the course delivered on 20 June 2022 remotely via Microsoft Teams, and this support worked well throughout the training course. However, when the training course ended, and the candidates were advised to log-off to login to the third party platform to complete the online exam using remote invigilation technology, delivered through the third-party, it became apparent that the BSL interpreters had no instructions about what they were to do. They were therefore unable to provide support to the candidate for them to access entry to the online exam delivered through the third party.

Provider 1 failed to alert the third party, who deliver the online exam using remote invigilation technology, of the need for a reasonable adjustment for the candidate when the online exam was booked with them. Therefore, the third party was unaware that one of the candidates due to sit the exam on 20 June 2022 had a hearing impairment.

The third party was consulted on 21 June 2022 on how the exam process could be adapted for someone with profound deafness. The third party confirmed that if support could be provided for logging-in, connecting with the invigilator and identity check, then the rest of the exam was visual and communication with the invigilator could be via a text chat function in the programme.

On 22 June 2022, Provider 1 rescheduled the candidate's online exam (delivered through the third party) to 23rd June 2022.

Provider 1 informed the third party by email on 22 June that the candidate was profoundly deaf and that his wife was going to be with him initially to complete sound checks and identity verification, and requested that the third party highlight to the invigilator that they would have to use the chat box facility to communicate with the candidate. The third party confirmed that their remote invigilation team had been advised to use the chat box functionality with this candidate.

When the candidate undertook and passed the online exam using remote invigilation delivered through the third party on 23 June 2002, the candidate was questioned on-screen by the third party software, 'Do you hear the beeps?', which the candidate clicked 'Yes' to.

The Accreditation Auditor understands that the candidate was required to click 'Yes' because it is an automated system check that must be answered in the affirmative in order to proceed to enter the online exam. This is to ensure that the invigilators have the correct connections to the candidate's device to protect the integrity of each exam. The Accreditation Auditor felt that this could have been explained to the candidate prior to them undertaking the online exam using remote invigilation delivered through the third party on 23 June 2022.

The candidate was then connected to a 'supervisor' through a chat screen and was asked if they could hear them. The candidate responded, 'No, I am deaf'. The candidate was also asked to pan the camera around their ears. Presumably this was to check that they did not have any listening devices. However, after having just advised that he was deaf, it seemed that the person on the other end of the chat did not understand this, which left the candidate feeling embarrassed and irritated.

The Accreditation Auditor could see no reason as to why the 'supervisor' from the third party had to ask if the learner was deaf, or complete the check around the ears, particularly as the third party had previously confirmed to Provider 1 that their remote invigilation team had been advised of the reasonable adjustment that was necessary, and it was agreed to use the chat box functionality with this candidate, who was profoundly deaf.

This situation could have been avoided and any embarrassment or irritation felt by the candidate could have been mitigated.

This has been recorded as **Issue 7**.

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

The *AFS Centre Guidance LBM Qualification* (April 2022), page 3, states:

'Candidates who sit the online exam provided by the third party will receive instant, on-screen notification of whether they have passed or failed on completion of the exam. Exam results are collated by the third party and provided to Alcohol Focus Scotland. Alcohol Focus Scotland will generate and issue certificates within 14 days of receipt of the third party results report.'

However, AFS had not generated and issued certificates within 14 days of receipt of the third party results report. Due to the bulk of the *Licensing Board Members' Qualification* training and assessment taking place within three months after the local government elections on 5 May 2022 in Scotland, when newly elected members were appointed to the Licensing Board.

AFS has not complied with its own timescale for issuing certificates as specified in the *AFS Centre Guidance LBM Qualification* (April 2022).

This has been recorded as **Issue 8**

2.2 Recommendations

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 AFS Quality Assurance Systems document, last reviewed April 2022, page 5, states:

'At the end of the visit, the External Quality Assurer may provide oral and written feedback. The feedback will identify any required actions, advisory actions or suggestions for improvement and The EQA will provide a final written report using the Alcohol Focus Scotland External Verification Report Template or similar within 14 working days of the visit.'

In reviewing the external quality assurance reports given to the Accreditation Auditor prior to the remote provider monitoring activity, the Accreditation Auditor noted that the *AFS External Verification Report Template* does not contain a section to record any required actions, advisory actions or suggestions for improvement raised.

AFS should consider adding a section to its *AFS External Verification Report Template* to clearly record any required action points, advisory actions or suggestions for improvements, to include:

- a member of staff responsible for addressing the actions
- what action should be taken and a date for completion
- the date the action is implemented

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

3 Acceptance of Provider Monitoring Findings