



# **Provider Monitoring Report**

**BIIAB Qualifications Limited**

**6 October 2022 to 21 October 2022**

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# 1 Background

Three providers were remotely monitored between 6 October and 21 October 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**

BIIAB Qualifications Limited provider monitoring dates: 6 October to 21 October 2022

Provider Monitoring Report approved by  
Accreditation Co-ordination Group on: 7 December 2022

Provider Monitoring Report to be signed by BIIAB  
Qualifications Limited: 27 January 2023

Action Plan to be emailed  
to [regulation@sqa.org.uk](mailto:regulation@sqa.org.uk) by BIIAB  
Qualifications Limited 27 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](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 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 e-mailed to BIIAB Qualifications Limited 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, five Issues have been recorded and three Recommendation have been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principle 9	The provider-devised data protection policy for provider 1 has not been updated to take account of current legislation surrounding the Data Protection Act 2018 and UK General Data Protection Regulation (GDPR).	Low
2. Principle 9	The Accreditation Auditor was unable to confirm that provider 3 had complied with the requirements of risk assessment for its venues as stipulated in <i>BIIAB Qualifications Centre Handbook November (2020, V4)</i> .	Low
3. Principle 12	Provider 3 had not complied with BIIAB <i>Remote Invigilation: Minimum Requirements (V1.21-22)</i> for online examinations, invigilated remotely.	Medium
4. Principle 13	Neither providers 1 nor 3 has complied with the <i>Training Delivery and Assessment Strategy for Scottish Personal Licence Holder Qualifications (October 2019 — Approved by ACG on 11 December 2019)</i> .	Medium
5. Principle 18	The provider-devised malpractice and maladministration policy (reviewed June 2022) for provider 3 does not comply with Regulatory Principle 18 as it does not clearly define processes to deal with maladministration.	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.

<b>Recommendation</b>	<b>Detail of Recommendation noted</b>
1. Principle 8	It is recommended that BIIAB Qualifications Limited upload all documents, where appropriate, to SharePoint to ensure ongoing compliance with SQA Accreditation's regulatory requirements.
2. Principle 16	BIIAB Qualifications Limited to provide SQA Accreditation with the agreed evidence stated in their action plan for 2021-2022 as the issue for complaints had been raised in the previous audit report for 2021-2022 with an agreed target date for completion of 31 July 2023. Therefore, in this instance the Accreditation Auditor has noted this a recommendation.
3. Principle 17	BIIAB Qualifications Limited to provide SQA Accreditation with the agreed evidence stated in their action plan for 2021-2022 as the issue for appeals had been raised in the previous audit report for 2021-2022 with an agreed target date for completion of 31 July 2023. Therefore, in this instance the Accreditation Auditor has noted this a recommendation.

## 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 BIIAB Qualification Limited 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 Good Practice, Issues and Recommendations

The following sections detail:

- ◆ good practice noted by providers
- ◆ Issues recorded and Recommendations noted against SQA Accreditation's regulatory requirements

### 2.1 Good Practice

The following areas of good practice were noted by providers:

Provider 1 highlighted:

- ◆ excellent service provided being both friendly and supportive

Provider 2 highlighted:

- ◆ support provided to provider by its EQA

Provider 3 highlighted:

- ◆ excellent service and support provided by BIIAB Qualifications Limited awarding body external quality assurer (EQA) and customer support team.

### 2.2 Issues

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

The Accreditation Auditor noted that the provider-devised data protection policy provided by provider 1 refers to the EU General Data Protection Regulation (GDPR) and not the updated UK GDPR.

On reviewing the provider-devised data protection policy given to the Accreditation Auditor by provider 3, the Accreditation Auditor noted that it had not been updated to reflect the Data Protection Act (DPA) 2018.

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

On page 10 of *BIIAB Qualifications Centre Handbook November (2020, V4)*, under 'venues' it states 'The venue will typically be a room(s) in a conference Centre or hotel. The venue will not be permanently staffed; the Centre will hire the room(s) just for the period of the course. The Centre need to carry out a risk assessment prior to each course being run at the venue and a checklist completed to ensure that the venue is suitable for the course being run.'

Provider 3 explained to the Accreditation Auditor that all venues are risk assessed against its Health and Safety Policy (risk assessment) documentation.



However, provider 3 was unable to provide the Accreditation Auditor with copies of risk assessments completed prior to each course being run to ensure that the venue is suitable for the course being delivered.

The Accreditation Auditor was unable to confirm that provider 3 had complied with the requirements of risk assessment for its venues as stipulated in *BIIAB Qualifications Centre Handbook November (2020, V4)*.

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**

On page 1 of the *BIIAB Remote Invigilation: Minimum Requirements (V1.21-22)* under 'Online examinations, invigilated remotely' it states 'All remotely invigilated sessions must meet the following minimum requirements:

- ◆ Invigilation of the full examination must be recorded and made available to BIIAB upon request.
- ◆ Candidates must verify their identity in advance of the examination by holding a valid form of photographic identification to the screen. This must be included within the recording.
- ◆ Candidates must undertake a 360 degree scan of the room and their desk area to prove that the candidate has no access to smart devices or other restricted items during the examination. This scan will verify that the room is free of any sources of influence.
- ◆ Invigilators must remind candidates that mobile phones, headphones, or other internet enabled devices are not permitted to be in the room unless being used as a part of that recording, in which case they should be placed out of the reach of the candidate at all times during the examination.
- ◆ The candidate must be visible to the invigilator at all times during the examination.
- ◆ The invigilation method must enable the invigilator to see all candidates at all times. This requirement does place a limit on the number of candidates that may be invigilated in one session (dependent on the invigilation platform used) – the Centre should take this requirement into account when booking examinations.
- ◆ The invigilator will stop the test, should any external influence be suspected.
- ◆ A copy of all recordings must be held for a period of 3 years and made available to BIIAB upon request.

Prior to the provider monitoring activity Provider 1 provided the Accreditation Auditor with a copy of an audio and video recording for one of its candidates who had completed the Scottish Certificate of Personal Licence Holders qualifications (SCPLH) online exam, invigilated in-person by a member of staff appointed by the BIIAB recognised centre in October 2021.

On reviewing both the audio and video recordings provided by Provider 1 the Accreditation Auditor noted that the audio recording had recorded the full multiple-choice question (MCQ) online exam. However, the video recording only recorded up until question 20 out of 40 of the MCQ exam.

The Accreditation Auditor noted that the candidates did not verify their identity in advance of the examination by holding a valid form of photographic identification to the screen. Nor did the Invigilator remind candidates that mobile phones, headphones, or other internet enabled devices are not permitted to be in the room unless being used as a part of that recording, in which case they should be placed out of the reach of the candidate at all times during the examination.

In addition, Provider 1 provided the Accreditation Auditor with a copy of its *External Quality Assurance (EQA) Online Invigilation* report completed in August 2022 which recorded under 'Anomalies' that the candidate was wearing a headset during the MCQ exam in August 2022. The EQA noted that the provider has been told previously that this is not allowed.

Provider 3 had not complied with BIIAB *Remote Invigilation: Minimum Requirements (V1.21-22)* for online examinations, invigilated remotely.

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.**

On page 4 of the *Training Delivery and Assessment Strategy for Scottish Personal Licence Holder Qualifications* (October 2019) - Approved by ACG 11/12/2019, under 'Training Delivery', it states that 'The centre is responsible for quality assuring training delivery; the awarding body is responsible for verifying that the centre adheres to agreed quality assurance requirements.'

At the time of the provider monitoring activity, both providers 1 and 3 explained to the Accreditation Auditor that they currently do not have an internal quality assurer. Therefore, both providers were unable to quality assure the observation of training delivery as specified in the *Training Delivery and Assessment Strategy for Scottish Personal Licence Holder Qualifications* (October 2019).

Both providers 1 and 3 have not complied with the *Training Delivery and Assessment Strategy for Scottish Personal Licence Holder Qualifications* (October 2019 — Approved by ACG on 11 December 2019).

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

**Regulatory Principle 18. The awarding body and its providers must ensure that it has safeguards to prevent and manage cases of malpractice and maladministration.**

On reviewing the provider-devised malpractice and maladministration policy (reviewed June 2022) for provider 3, the Accreditation Auditor noted that it does not comply with Regulatory Principle 18 as it does not clearly define processes to deal with maladministration.

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

## 2.3 Recommendations

### **Regulatory Principle 8. The awarding body must ensure that SQA Accreditation is granted access to all information relating to accredited qualifications.**

As part of the provider monitoring activity, the Accreditation Auditor reviewed awarding body documentation uploaded on SharePoint and noted that several BIIAB Qualifications Limited documents had not been uploaded to SharePoint. Examples include:

- ◆ *BIIAB Qualifications Centre Handbook* (November 2020 V4)
- ◆ *BIIAB Qualifications Remote Invigilation: Minimum Requirements* (V1.21-22) and
- ◆ *BIIAB Qualifications External Quality Assurance Policy*

It is recommended that BIIAB Qualifications Limited upload all documents, where appropriate, to SharePoint to ensure ongoing compliance with SQA Accreditation's regulatory requirements.

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

### **Regulatory Principle 16. The awarding body and its providers must have open and transparent systems, policies and procedures to manage complaints.**

On page 4 of the *BIIAB Complaints Policy* (Updated: February 2022) it states that 'All BIIAB Qualifications Limited approved centres delivering qualifications that are regulated by SQA Accreditation should inform candidates as part of their induction process, of the opportunity to submit complaints to both BIIAB Qualifications and the regulator.'

On reviewing the provider-devised complaints and appeals procedure (August 2022) for Provider 1, the Accreditation Auditor noted that it referred its candidates to an out-of-date BIIAB complaints policy and procedure dated (August 2014).

It did not inform its candidates of how and when they can escalate a complaint to SQA Accreditation, as the qualification regulator.

The provider devised complaints procedure (May 2022) given to the Accreditation Auditor by Provider 2 has been specifically written to comply with a competitor awarding body processes and procedures containing hyperlinks to this awarding body complaints handling procedure. It does not inform candidates of the opportunity to submit complaints to BIIAB Qualifications Limited.

BIIAB Qualifications Limited to provide SQA Accreditation with the agreed evidence stated in their action plan for 2021-2022 as the issue for complaints had been raised in the previous audit report for 2021-2022 with an agreed target date for completion of 31 July 2023. Therefore, in this instance the Accreditation Auditor has noted this a recommendation.

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

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

On page 1 of *BIIAB Qualifications Limited Enquiries and Appeals Policy* (Updated: March 2022) under 'General' it states, 'we require all centres which have a duty of care for candidates

to have an accessible appeals policy and procedure to enable expressions of dissatisfaction about results or any decisions affecting the outcomes of assessment.'

On reviewing the provider-devised complaints and appeals procedure (August 2022) for provider 1, the Accreditation Auditor noted that it referred its candidates to an out-of-date BIIAB appeals policy and procedure dated (August 2014).

It did not inform candidates that, if they were dissatisfied with the outcome of their appeal to BIIAB Qualifications Limited, they have the right to submit a complaint to SQA Accreditation, as the qualifications regulator — whose role it is to review and ensure that the correct awarding body policies and procedures had been followed.

The provider-devised appeals procedures for both providers 1 and 3 do not make it clear that SQA Accreditation is unable to overturn assessment decisions or academic judgements.

The *Qualification Handbook Certificate in Optical Practice Support at SCQF Level 5 R602 04* (Version 1, August 2019) states on page 12 under 'Appeals' that 'BIIAB expects most appeals from candidates to be resolved within the centre. BIIAB will only consider a candidate's appeal after the centre's internal appeals procedure has been fully exhausted. For full details of the BIIAB's appeals procedure please refer to [www.biiab.org](http://www.biiab.org).'

The provider-devised appeals procedure (August 2018) given to the Accreditation Auditor by provider 2 has been specifically written to comply with a competitor awarding body processes and procedures, informing candidates to appeal to a competitor awarding body for candidates on regulated qualifications. It does not inform candidates that, after the centre's internal appeals procedure has been fully exhausted, they are to follow *BIIAB Qualifications Limited Enquiries and Appeals Policy* (Updated: March 2022).

BIIAB Qualifications Limited to provide SQA Accreditation with the agreed evidence stated in their action plan for 2021-2022 as the issue for appeals had been raised in the previous audit report for 2021-2022 with an agreed target date for completion of 31 July 2023. Therefore, in this instance the Accreditation Auditor has noted this a recommendation.

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

### **3 Acceptance of Provider Monitoring Findings**