



Provider Monitoring Report

City and Guilds

14 July 2023 to 18 August 2023

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1 Background

Three providers were remotely monitored between 14 July 2023 and 18 August 2023.

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

City and Guilds provider monitoring dates: 14 July 2023 to 18 August 2023

Provider Monitoring Report approved by Accreditation Co-ordination Group on: 4 October 2023

Provider Monitoring Report to be signed by City and Guilds: 15 November 2023

Action Plan to be emailed to regulation@sqa.org.uk by City and Guilds 15 November 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 e-mailed to City and Guilds 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 Recommendations have been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principles 5 & 14	City and Guilds must ensure that its providers' Reasonable Adjustment policy includes Special Considerations.	Low
2. Principles 8 & 9	City and Guilds must ensure that the most up-to-date versions of its documents are uploaded to its SharePoint site.	Low
3. Principle 9	City and Guilds must ensure that its providers' Data Protection policy reflects the update to the Data Protection Act in 2018, moving from compliance with eight to seven principles.	Low
4. Principles 9 & 17	City and Guilds must ensure that its providers' appeals policies reference appropriate escalation for its SQA accredited qualifications to the awarding body and SQA Accreditation, as the qualification regulator, and make it clear that SQA Accreditation is unable to overturn assessment decisions or academic judgements.	Low
5. Principles 9 & 18	City and Guilds must ensure that its providers have clearly defined processes to deal with malpractice and maladministration. This policy must have a process for the Head of Centre to notify City and Guilds's Investigation and Compliance team of all allegations or incidents of malpractice, actual or suspected within 10 working days of it being reported to them and prior to the commencement of any internal investigation activity, so that these can be reported to SQA Accreditation.	Medium

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 & 7	City and Guilds may wish to remind its Industry Managers on the process of updating qualification extension dates on City and Guilds website and Walled Garden to ensure that City and Guilds is providing clear, accurate and appropriate information on its products for its SQA accredited qualifications whilst demonstrating an effective approach to communication.
2. Principles 7 & 9	City and Guilds should review how effective its communication to providers is in respect of the minimum spend threshold, whilst ensuring that providers having to close down due to City and Guilds withdrawing qualifications in Scotland will not be invoiced for being under the minimum spend threshold.
3. Principle 15	City and Guilds should consider how it resolves and deals with the issue of Multiple-Choice Questionnaire (MCQ) exams being dropped from the City and Guilds Evolve web-based system due to system upgrades, whilst ensuring that they have reliable systems for resulting and certification.

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 City and Guild'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 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:

- ◆ External Quality Assurers (EQA) are extremely professional, contactable and helpful providing knowledgeable assistance when required

Provider 2 highlighted:

- ◆ excellent service provided by City and Guilds administration
- ◆ EQA is supportive and approachable

2.2 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.

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.

The Reasonable Adjustment policy at provider 2 only referenced Reasonable Adjustments, with no mention of Special Considerations.

City and Guilds must ensure that its providers' Reasonable Adjustment policies include Special Considerations.

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

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

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

In advance of the provider monitoring activity, the Accreditation Auditors reviewed documentation uploaded on City and Guilds SharePoint site. It was noted that several documents were out of date, with updated versions available on City and Guilds website in

centre document library. Some examples of these updated documents are the Managing cases of suspected malpractice in examinations and assessments, Version 8.1, last modified 6-December-2022, Centre assessment Quality Assurance Standards, Version 1.1, last modified 26-June-2023, and Centre Handbook Quality Assurance Standards, Version 1.1, last modified 26-June-2023.

City and Guilds must ensure that the most up-to-date versions of their documents are uploaded to their SharePoint site.

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

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

On reviewing the provider-devised Data Protection policy dated 15 February 2021 for provider 3, the Accreditation Auditor noted that it had not been updated to reflect the update to the Data Protection Act in 2018, moving from compliance with eight to seven principles.

City and Guilds must ensure that its providers' Data Protection policy reflects the update to the Data Protection Act in 2018, moving from compliance with eight to seven principles.

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

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

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

City and Guilds EQA had issued an action point to provider 3 in *City and Guilds Remote Annual Systems Visit Report* in April 2022 which stated they had to 'Ensure that the appeals process clearly indicates that SQA Accreditation cannot overturn assessment decisions or academic judgements to be completed by 24 June 2022'.

On reviewing both provider-devised appeals procedure for providers 2 and 3, the Accreditation Auditor noted that they do not make it clear that SQA Accreditation is unable to overturn assessment decisions or academic judgements.

Nor does the apprenticeship appeals procedure for provider 2 inform learners if still dissatisfied with the outcome of their appeal they can escalate an appeal to City and Guilds awarding body. Subsequently, if still dissatisfied, 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.

In addition, the Accreditation Auditor noted that the escalation route provided in the provider-devised apprenticeship appeals procedure for provider 2 states that 'If the matter is not resolved, the complaint can be referred to the Education and Skills Funding Agency (ESFA).' However, the Accreditation Auditor noted that this is not a route of escalation available to learners undertaking SQA accredited qualifications or for Scottish Modern Apprenticeships.

City and Guilds must ensure that its providers' appeals policies reference appropriate escalation for its SQA accredited qualifications to the awarding body and SQA Accreditation, as the qualification regulator, and make it clear that SQA Accreditation is unable to overturn assessment decisions or academic judgements.

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

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

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

Section 2.1.2 'Notifications' of the Managing cases of suspected malpractice in examinations and assessments, Version 8.1, last modified 6-December-2022, states on page 10 that 'The Head of Centre is required to notify the City & Guilds' Investigation & Compliance team of all allegations or incidents of malpractice, actual or suspected within 10 working days of it being reported to them and prior to the commencement of any internal investigation activity. Failure to report incidents of suspected malpractice within 10 working days may result in the application of a centre sanction or a change to the centre risk rating.'

On reviewing the Malpractice and Maladministration policies of both providers 2 & 3, the Accreditation Auditor noted that they do not have processes for the Head of Centre to notify the City & Guilds Investigation & Compliance team of all allegations or incidents of malpractice, actual or suspected within 10 working days of it being reported to them and prior to the commencement of any internal investigation activity.

In addition, the provider-devised Malpractice policy given to the Accreditation Auditor by provider 2 makes no reference to maladministration. The Accreditation Auditor is therefore unsure how this provider could be safeguarding or managing maladministration when their policy makes no mention of it.

City and Guilds must ensure that its providers have clearly defined processes to deal with malpractice and maladministration. This policy must have a process for the Head of Centre to notify the City & Guilds' Investigation & Compliance team of all allegations or incidents of malpractice, actual or suspected within 10 working days of it being reported to them and prior to the commencement of any internal investigation activity, so that these can be reported to SQA Accreditation.

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

2.3 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.

Regulatory Principle 7. The awarding body must have an effective approach for communicating with its staff, stakeholders and SQA Accreditation.

During the provider monitoring visit to provider 2 in July 2023 the provider explained to the Accreditation Auditor that they had only recently found out that the last registration date for Workplace Core Skills would be 31 July 2023, as noted on the Walled Garden. No communication to this effect was provided by City and Guilds.

The provider went on to explain to the Accreditation Auditor that they were looking to gain approval with another awarding body approved to deliver Workplace Core Skills as they had a potential intake of apprenticeship learners starting in October 2023.

Following correspondence between SQA Accreditation and City and Guilds on 21 July 2023, it was established that there was a simple error in updating the information provided on the Walled Garden, and that Core Skills had not been withdrawn without a notification to providers. The provider was notified of this fact by SQA Accreditation on 10 August 2023.

An important Alert for Workplace Core Skills was sent out to City and Guilds providers informing them that 'The last registration date for new learners is 31 July 2025 with a final certification date of 31 July 2028.'

City and Guilds may wish to remind its Industry Managers on the process of updating qualification extension dates on City and Guilds website and Walled Garden to ensure that City and Guilds is providing clear, accurate and appropriate information on its products for its SQA accredited qualifications whilst demonstrating an effective approach to communication.

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

Regulatory Principle 7. The awarding body must have an effective approach for communicating with its staff, stakeholders and SQA Accreditation.

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

Provider 1 informed the Accreditation Auditor that 'all centres approved for the delivery of regulated qualifications with City and Guilds in the UK are required to spend a minimum order value each year. Where a provider fails to meet the minimum threshold an annual top-up invoice will be issued to cover cost of ongoing provider support. The exact threshold for each year can be found in our centre charges list.'

Provider 1 noted that it received an e-mail from City and Guilds in June 2022 in respect of the minimum spend threshold which stated '*As discussed, we manage your learners until*

they complete. Then we will close your centre down and you will not be invoiced for the minimum spend.'

However, provider 1 went on to explain to the Accreditation Auditor that it was subsequently contacted by City and Guilds saying that it was under the minimum spend threshold and would be invoiced accordingly. The provider had to explain to City and Guilds that this was the result of the awarding body withdrawing the relevant qualifications in Scotland, with the provider unable to register any further learners.

City and Guilds should review how effective its communication to providers is in respect of the minimum spend threshold, whilst ensuring that providers having to close down due to City and Guilds withdrawing qualifications in Scotland will not be invoiced for being under the minimum spend threshold.

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

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

Provider 1 explained to the Accreditation Auditor that they had experienced issues with City and Guilds when claiming certificates for learners who had completed the Diploma in Heavy Vehicle Maintenance and Repair Principles at SCQF Level 7 qualification. City and Guilds informed the provider that they had upgraded their Evolve web-based system which had resulted in Multiple Choice Question (MCQ) exams being dropped from the Evolve web-based system.

This issue was resolved, in this instance, as Provider 1 had retained printouts of Onscreen Test Result Reports for its learner's which were kept in their portfolios. These were then sent to City and Guilds as proof of learner's passing the MCQ exams which were completed via the Evolve web-based system.

City and Guilds should consider how it resolves and deals with the issue of MCQ exams being dropped from the City and Guilds Evolve web-based system due to system upgrades, whilst ensuring that they have reliable systems for resulting and certification.

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

3 Acceptance of Provider Monitoring Findings