



Provider Monitoring Report

Highfield Qualifications

13 March 2023 to 21 April 2023

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1 Background

Five providers were remotely monitored between 13 March 2023 and 21 April 2023.

1.2 Provider Monitoring Report Timescales

Highfield Qualifications provider monitoring dates: 13 March 2023 to 21 April 2023

Provider Monitoring Report approved by
Accreditation Co-ordination Group on: 7 June 2023

Provider Monitoring Report to be signed by Highfield
Qualifications: 20 July 2023

Action Plan to be emailed
to regulation@sqa.org.uk by Highfield Qualifications 20 July 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 Highfield Qualifications 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, six Issues have been recorded and two Recommendations have been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principle 5	Both providers 3 and 5 are not complying with the Training Delivery and Assessment Strategy for Scottish Personal Licence Holder Qualifications October 2019 - Approved by ACG 11/12/2019, or the Qualification Specifications for Scottish Certificate for Personal Licence Holders at SCQF level 6 Qualification Number: R654 04 and Scottish Certificate for Personal Licence Holders (Refresher) at SCQF level 6 Qualification Number: R655 04. These stipulate that a handbook is a mandatory requirement for the delivery and assessment of this qualification and learners should have access to the handbook a minimum of two days before the course commences to allow prior study of the material.	High
2. Principles 8 and 9	The Accreditation Auditor was unable to ensure compliance with the Qualification Specification for Highfield Award for Door Supervisors in the Private Security Industry (Scotland) by confirming retention of daily registers signed by learners undertaking the Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 qualification by provider 4, as this was not provided to the Accreditation Auditor when requested.	Medium
3. Principle 9	Several documents given to the Accreditation Auditor by providers 1, 4 and 5 had no version control.	Medium

	<p>In addition, the Data Protection policy at provider 4 has not been updated to reflect the update to the Data Protection Act in 2018, moving from compliance with eight to seven principles.</p> <p>The Accreditation Auditor was unable to ensure that only the most up-to-date versions of applicable documents are available at the point of use.</p>	
4. Principle 13	<p>Provider 2 confirmed that they had not undertaken internal quality assurance of live observation, and therefore was unable to provide the Accreditation Auditor with evidence that internal quality assurance of live observation of course delivery/assessment had taken place as stipulated in the Highfield Qualifications <i>Tutor, Assessor and Internal Quality Assurance Support Pack for Highfield Award in Emergency First Aid at SCQF level 6 and the Assessment Principles for Regulated First Aid Qualifications Version 7 – 1 April 2022 Approved by ACG 30 March 2022</i></p>	Low
5. Principle 13	<p>Highfield Qualifications must ensure that its providers delivering the Scottish Certificate for Personal Licence Holders at SCQF level 6 (R654 04) and Scottish Certificate for Personal Licence Holders (Refresher) at SCQF level 6 (R655 04) complete and submit as a minimum an annual quality assurance questionnaire and receive annual scrutiny activity in the form of an online questionnaire for these qualifications.</p>	Medium
6. Principle 18	<p>Highfield Qualifications must ensure that their providers' procedures have a route for reporting all cases of suspected malpractice to them so that these can be reported to SQA Accreditation.</p> <p>Provider 4 informed the Accreditation Auditor that they are only approved by Highfield Qualifications awarding body. However, on reviewing the Malpractice Policy for provider 4, the Accreditation Auditor noted erroneous references to a competitor's procedures on the right to appeal suspected or reported malpractice by a centre or candidate including their requirements for record retention.</p> <p>In addition, the Malpractice Policy given to the Accreditation Auditor by provider 4 does not</p>	Medium

	contain a definition or any examples of maladministration.	
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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. Principle 9	Highfield Qualifications should remind its providers of its responsibility to inform Highfield of any changes in circumstances of the centre, centre contact or centre personnel to ensure that the provider lists given to SQA Accreditation are up to date and accurate for the purposes of provider monitoring quality assurance.
2. Principle 13	Highfield Qualifications may wish to consider further review of the feedback given by the Accreditation Auditor in relation to the recorded footage provided to SQA Accreditation for quality assurance purposes.

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.

1.4 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 Highfield Qualifications 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:

- ◆ customer focused and good to work with
- ◆ staff are engaging, helpful and knowledgeable

Provider 2 highlighted:

- ◆ processes and procedures are straightforward and user friendly to work with

Provider 3 highlighted:

- ◆ excellent relationship with account manager
- ◆ good communication between awarding body and provider
- ◆ remote proctored examination work extremely well

Provider 5 highlighted:

- ◆ External Quality Support (EQS) team are quick to respond to queries and requests

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.

The Training Delivery and Assessment Strategy for Scottish Personal Licence Holder Qualifications October 2019 - Approved by ACG 11/12/2019 states, on page 4, under the heading 'Training Delivery' that 'Candidates must be provided with a copy of a relevant course handbook at least two days (best practice is seven days) before the course commences to allow prior study of the material.'

The Qualification Specifications for Scottish Certificate for Personal Licence Holders at SCQF level 6 Qualification Number: R654 04 and Scottish Certificate for Personal Licence Holders (Refresher) at SCQF level 6 Qualification Number: R655 04 state under the heading 'Training Materials' that 'The use of a relevant handbook is a mandatory requirement for the delivery and assessment of this qualification and learners should have access to the

handbook a minimum of two days before the course commences to allow prior study of the material. Highfield recommends learners receive the handbook seven days in advance of the course to provide adequate study time.'

Provider 3 explained to the Accreditation Auditor that the Highfield Licensing Course Book (Scotland) is made available to its learners as an online link in the introduction section at the start of their provider-devised online training course for the Scottish Certificate for Personal Licence Holders qualification. This was confirmed by the Accreditation Auditor when reviewing the provider-devised online training course on 21 April 2023.

At the time of the provider monitoring visit to provider 5, the Accreditation Auditor was informed that they would only provide a copy of the Highfield Licensing Course Book when requested by the learner.

Therefore, both providers 3 and 5 are not complying with The Training Delivery and Assessment Strategy for Scottish Personal Licence Holder Qualifications October 2019 - Approved by ACG 11/12/2019 or the Qualification Specifications for Scottish Certificate for Personal Licence Holders at SCQF level 6 Qualification Number: R654 04 and Scottish Certificate for Personal Licence Holders (Refresher) at SCQF level 6 Qualification Number: R655 04. These stipulate that a handbook is a mandatory requirement for the delivery and assessment of this qualification and learners should have access to the handbook a minimum of two days before the course commences to allow prior study of the material.

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.

The Qualification Specification Highfield Award for Door Supervisors in the Private Security Industry (Scotland) at SCQF level 6 Qualification Number: R670 04, states, on page 8 under the heading 'Guidance on delivery' that 'Centres must retain detailed registers that include start/end/break times of training for each day, and these must be signed daily by the learners. This includes a record of any late arrivals/early leavers and how these learners made up the required hours which they missed. These must be retained for audit purposes. Training centres must retain this information for a minimum of three years in line with the retention of assessment evidence requirements.'

At the time of the provider monitoring visit, provider 4 explained to the Accreditation Auditor that they were bad at remembering to undertake detailed registers that included start/end/break times of training for each day.

The Accreditation Auditor was unable to ensure compliance with the Qualification Specification Highfield Award for Door Supervisors in the Private Security Industry (Scotland) by confirming retention of signed daily registers, as these were not provided when requested.

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

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

When reviewing the provider-devised documentation for providers 1, 4 and 5, the Accreditation Auditor noted that a number of their documents had no version control, eg Data Protection Policy, Reasonable Adjustment and Special Considerations Policy and Complaints Procedure.

In addition, the Accreditation Auditor noted that the Data Protection policy given to the Accreditation Auditor by provider 4 has not been updated to reflect the update to the Data Protection Act in 2018, moving from compliance with eight to seven principles.

The Accreditation Auditor was unable to ensure that only the most up-to-date versions of applicable documents are available at the point of use.

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 Principles for Regulated First Aid Qualifications Version 7 – 1 April 2022 Approved by ACG 30 March 2022, states, on page 4, under the heading 'Internal Quality Assurance' that 'Internal Quality Assurers must: Visit and observe assessments.'

Highfield Qualifications's *Tutor, Assessor and Internal Quality Assurance Support Pack for Highfield Award in Emergency First Aid at SCQF level 6 Qualification Number: R782 04*, states, on page 17, under the heading 'Internal Quality Assurance IQA support' the following:

'It is important to note that the IQA role is one of support and as a result should improve the delivery and assessment programme over time. IQA samples can be completed in a number of ways however the main two methods are:

1. Live observation of course delivery/assessment (visit to an active course).
2. Desk-based sampling of course assessment material (either during a visit or remote check of completed assessment packs).

It is important to note that it is **not a requirement that every course is internally quality assured** via live observation visits, and instead desk-based samples should be used to support this process. Centres must take responsibility for planning and implementing an effective quality assurance procedure which is clearly evidenced within their sampling plan and verification process.'

The Accreditation Auditor was given evidence confirming that internal quality assurance of desk-based reviews of course assessment material was completed by provider 2.

Provider 2 confirmed that they had not undertaken internal quality assurance of live observation therefore were unable to provide the Accreditation Auditor with evidence that internal quality assurance of live observation of course delivery/assessment had taken place as stipulated in the Highfield Qualifications *Tutor, Assessor and Internal Quality Assurance Support Pack for Highfield Award in Emergency First Aid at SCQF level 6* and the

*Assessment Principles for Regulated First Aid Qualifications Version 7 – 1 April 2022
Approved by ACG 30 March 2022.*

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

The Highfield Quality Assurance Strategy states, on page 7, under the heading 'Centre Monitoring' the following:

6.2.4 Approval and re-approval checks of SCQF delivery.

6.2.4.1 As a minimum a centre delivering qualifications on the SCQF will be sent a quality assurance questionnaire. This questionnaire has been designed as a self-evaluation activity for all active centres to complete. The aim of the questionnaire is to remind centres of the regulatory requirements and to allow the centre to confirm that their policies and process still meet these.

6.2.5 Approval checks of First Aid, Functional Skills, Introduction to Taxi, and PLH/SCPLH qualifications. Scrutiny of centres delivering these qualifications falls between various departments as follows:

6.2.5.5 PLH/SCPLH qualifications require scrutiny of a centres personnel and processes to ensure ongoing compliance. Centres delivering these qualifications will be subject to annual scrutiny activity in the form of an online questionnaire. The questionnaire will be designed to:

- a. Obtain confirmation from the centre that all relevant personnel are compliant with the requirements set out with the specification.
- b. Provide video footage of training delivery and assessment* taking place. *If the centre does not use the qualify at home service.
- c. Ensure tutors remain appropriately competent and qualified.
- d. Ensure training resources are circulated within the required timeframe prior to the course taking place and maximum learner numbers are not exceeded.

6.2.6 Once scrutiny activity has been completed for the qualifications specified in section 6.2.5, the reviewer will contact the centre to discuss their findings and complete a report which will be sent onto the centre for their records.

Provider 1 provided the Accreditation Auditor with a screen shot from their Highfield Qualifications Members area, which documented the dates of completed questionnaires, confirming that the last quality assurance questionnaire – SQA Accreditation was submitted and accepted on 15 November 2021.

In addition, the Accreditation Auditor was given a copy of their last annual External Verification Report dated 12 February 2020 which scrutinised both the Scottish Certificate for Personal Licence Holders at SCQF level 6 (R654 04) and Scottish Certificate for Personal Licence Holders (Refresher) at SCQF level 6 (R655 04) qualifications.

Provider 3 informed the Accreditation Auditor that they had no knowledge of ever having completed or submitted an annual quality assurance questionnaire – SQA Accreditation. Nor had they received their annual scrutiny of the Scottish Certificate for Personal Licence Holders at SCQF level 6 (R654 04) qualification since the provider received approval from Highfield Qualifications to deliver this qualification on 20 November 2020.

Therefore, providers 1 and 3 had not submitted as a minimum their annual quality assurance questionnaire – SQA Accreditation to Highfield Qualifications.

Nor had they received their annual scrutiny activity from Highfield Qualifications for its Scottish Certificate for Personal Licence Holders at SCQF level 6 (R654 04) and Scottish Certificate for Personal Licence Holders (Refresher) at SCQF level 6 (R655 04) qualifications in the form of an online questionnaire.

In addition, all five providers had their complaints and appeals policies externally reviewed between 10 October 2022 to 13 January 2023 by Highfield Qualifications to close out Issues 3 and 4 in Highfield Qualifications Provider Monitoring Report 14 January to 31 March 2022.

Highfield Qualifications must ensure that its providers delivering the Scottish Certificate for Personal Licence Holders at SCQF level 6 (R654 04) and Scottish Certificate for Personal Licence Holders (Refresher) at SCQF level 6 (R655 04) qualifications complete and submit as a minimum an annual quality assurance questionnaire and receive annual scrutiny activity in the form of an online questionnaire for these qualifications.

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

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

The Highfield Malpractice and Maladministration Policy (2019) states, on page 7, under section 9 'Process for making an allegation of malpractice or maladministration', the following:

- 9.1 Anybody who identifies or is made aware of suspected or actual cases of malpractice or maladministration at any time must immediately notify Highfield. In doing so they should put them in writing/email and enclose appropriate supporting evidence.
- 9.2 All allegations must include (where possible):
 - 9.2.1 Centre's full name, address and telephone number;
 - 9.2.2 Learner's full name and Highfield registration number;
 - 9.2.3 Centre/Highfield personnel's details (name, job role) if they are involved in the case;
 - 9.2.4 Details of the Highfield course/qualification affected, or nature of the service affected;
 - 9.2.5 Nature of the suspected or actual malpractice and associated dates; and
 - 9.2.6 Details and outcome of any initial investigation carried out by the Centre or anybody else involved in the case, including any mitigating circumstances.
- 9.3 In addition, Highfield asks that the person making the allegation declares any personal interest they may have in the matter to us at the outset.
- 9.4 If a Centre has conducted an initial investigation prior to formally notifying us, the Centre should ensure that staff involved in the initial investigation are competent and have no personal interest in the outcome of the investigation. Highfield would expect that such investigations would normally involve the Head of Centre (if there is an investigation into allegations of malpractice or irregularities against the Head of the Centre or the management of the Centre, then such investigations should be carried out by the Chair of the Governing Body of the Centre or his/her nominee). However, it is important to note that in all instances the Centre must immediately notify us if they suspect malpractice or maladministration has occurred as Highfield has a responsibility to the regulatory authorities to ensure that all investigations are carried out rigorously and effectively.

On reviewing the Malpractice and Maladministration policies for providers 1, 2, 4 & 5, the Accreditation Auditor noted that there is no procedure or route for reporting suspected malpractice to the awarding body so that these can also be flagged to SQA Accreditation.

Highfield Qualifications must ensure that their providers procedures have a route for reporting all cases of suspected malpractice to them so that these can be reported to SQA Accreditation.

At the time of the provider monitoring activity, provider 4 informed the Accreditation Auditor that they are only approved by Highfield Qualifications awarding body. However, on reviewing the Malpractice Policy for provider 4, the Accreditation Auditor noted erroneous references to a competitor's procedures on the right to appeal suspected or reported malpractice by a centre or candidate, including their requirements for record retention.

In addition, the Malpractice Policy included a process for making an allegation of malpractice or maladministration to the provider, which contained a definition and examples of Malpractice. However, it did not contain a definition or any examples of maladministration.

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

2.3 Recommendations

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

The Accreditation Auditor was unable to contact Providers 3 & 4 by email, as the contact name and email address provided by Highfield Qualifications for both providers were incorrect on the approved Provider List emailed to the Accreditation Auditor on 23 January 2023.

The Accreditation Auditor was able to contact both providers by telephone. However, this did result in some delays for the Accreditation Auditor trying to organise both remote provider monitoring visits. In this instance the Accreditation Auditor has noted this as a recommendation and not an Issue.

The Highfield Centre agreement states, on page 4, under section '2.1.14 informing Highfield in writing of any changes in the circumstances of the Centre, Centre Contact or Centre personnel. Examples may include administrative changes - such as a change of address, telephone number or discontinuing using a particular Tutor.'

At the time of the provider monitoring visits both providers 3 & 4 informed the Accreditation Auditor that they had not informed Highfield Qualifications of the changes to contact name or email address.

Highfield Qualifications should remind its providers of its responsibility to inform Highfield of any changes in circumstances of the centre, centre contact or centre personnel to ensure that the provider lists given to SQA Accreditation are up to date and accurate for the purposes of provider monitoring quality assurance.

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

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 Accreditation Auditor selected a sample of recorded footage provided by Highfield Qualifications for six learners who had completed the Scottish Certificate for Personal Licence Holders at SCQF level 6 (R654 04) and the Scottish Certificate for Personal Licence Holders (Refresher) at SCQF level 6 (R655 04).

Highfield Qualifications uploaded to SharePoint the selected sample of recorded footage via a Microsoft Teams meeting recording, which meant that the Accreditation Auditor would be able to view each learner, with all streams synced up.

The Highfield Qualify at Home Learner Policy states, on page 2 under the heading 'Prior to the examination' that the examination pre-requisites will require you to confirm your identity using your photographic ID, held clearly in front of your web enabled camera. Simply follow the onscreen instructions.

On reviewing the footage of the six recordings, only the one recording for footage 2 recorded the learner confirming their identity using photographic ID, held clearly in front of their web enabled camera. However, we recognise that this footage was put together by Highfield Qualifications in this format for our quality assurance purposes.

The Highfield Qualify at Home Learner Policy goes on to state, on page 3 under the heading 'During the examination' the following:

'You are free to hold your exam in any room you wish; however, you must not have in sight:

- Any unauthorised materials or items or consult in any way any book, paper, document or other written, typed, or printed materials. Unauthorised materials include, for example, any learning documents, books, electronic devices (Not including the second camera), leaflets and non-transparent lids or cases, or any other unauthorised items specified by Highfield.
- Briefcases, handbags, books, revision notes electronic devices, smart watches and similar electronic devices are not allowed in any examination. Papers and other personal belongings must be removed from the room in which you are taking your exam.'

'No food may be taken or consumed in the room where you are taking the exam. You are allowed a bottle of water or similar, but the bottle or container must be transparent, the label must be removed, and no writing is allowed on the bottle or container.'

The Accreditation Auditor noted on reviewing the recording from footage 2 that the learner looked to be undertaking their online MCQ exam in a workplace environment which showed a wall in front of the learner's desk area which had printed materials stuck to the wall, a high energy drink can with written text on the learner's desk, and a briefcase nearby.

The Accreditation Auditor did not view in the footage any communication between the proctor and learner in the chat box indicating that these issues had been addressed by the proctor. However, as said earlier, we recognise that this footage was put together by

Highfield Qualifications in this format for our quality assurance purposes. These issues could have been entered as a comment or flagged for review by the proctor.

Highfield Qualifications may wish to consider further review of the feedback given by the Accreditation Auditor in relation to the recorded footage provided to SQA Accreditation for quality assurance purposes.

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

3 Acceptance of Provider Monitoring Findings