



Audit Report

Alcohol Focus Scotland

22 February 2021

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1 Background

This was the sixth audit of Alcohol Focus Scotland since it was approved as an awarding body by SQA Accreditation in 2007.

Alcohol Focus Scotland is Scotland's national alcohol charity working to reduce the harm caused by alcohol. As a nationally-recognised awarding body the organisation delivers accredited qualifications for Licensing Board Members and Licensing Standards Officers.

Alcohol Focus Scotland's headquarters are in Glasgow.

1.1 Scope

SQA Accreditation carries out quality assurance activity in line with its *Quality Assurance of Approved Awarding Bodies Policy*. This states the type and frequency of our quality assurance activities, describes our reporting procedures and indicates how the awarding body's Quality Enhancement Rating is calculated.

As this was a scoped and remote audit of Alcohol Focus Scotland, and not all regulatory requirements were included within the scope of the audit. Our quality assurance activities are conducted on a sampling basis and, consequently, not all aspects of the awarding body's systems, procedures and performance have been considered in this report to the same depth.

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

The audit was designed to ensure Alcohol Focus Scotland complies with SQA Accreditation's regulatory requirements namely:

- ◆ SQA Accreditation's Regulatory Principles (2014)
- ◆ all Regulatory Principles Directives
- ◆ the awarding body's Accreditation Licence

Awarding body documentation considered for review by the audit team includes all documents banked on Alcohol Focus Scotland's SharePoint site at the time of audit and information supplied to support audit activity. Restricted or commercially sensitive information gathered during SQA Accreditation's quality assurance activities is treated in the strictest confidence.

1.2 Audit Report and Action Plan Timescales

Alcohol Focus Scotland audit date: 22 February 2021

Audit Report approved by
Accreditation Co-ordination Group on: 17 March 2021

Audit Report to be signed by Alcohol Focus Scotland: 30 April 2021

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

- ◆ The awarding body will be sent a signed copy of the Audit Report by email.
- ◆ The awarding body must sign the copy of the Audit Report and return by email to SQA Accreditation in accordance with the timescale specified above.

The findings of this Audit Report will be published on SQA Accreditation's website following signed agreement.

SQA Accreditation will update the awarding body's Quality Enhancement Rating as appropriate.

1.3 Summary of Audit Issues and Recommendations

An Issue has been recorded where evidence shows that the awarding body is not compliant with SQA Accreditation's regulatory requirements. The awarding body must address the Issues and specify corrective and preventative measures to address them through its Action Plan.

As a result of the audit and post-audit activities, no Issues have been recorded and seven Recommendations have been noted.

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 2, 5 and 10	<p>Alcohol Focus Scotland may wish to consider the introduction of a formal invigilation checklist, based upon the relevant sections of the awarding body's <i>Remote Delivery & Invigilation Strategy</i>, to support standardisation across qualification assessment.</p> <p>The awarding body may also wish to consider allocating additional staff resources to ongoing e-assessment activity, should it be required through to 2022 and beyond.</p>
2. Principle 3	As database functionality increases and develops, Alcohol Focus Scotland may wish to consider future access requirements/limits around aspects of the Archimedes CRM system which contain learners' personal data.
3. Principles 3 and 4	Alcohol Focus Scotland may wish to provide SQA Accreditation with a copy of its current business continuity plan and risk register, followed by appropriately updated versions of both documents reflecting audit discussion on the process for updating, as well as actual operational changes in response to the COVID-19 pandemic.
4. Principles 6 and 10	<p>As part of the proposed <i>AFS Quality Assurance Policy</i> (August 2017) review, Alcohol Focus Scotland may wish to review the External Quality Assurance report template, ensuring that it specifically references key awarding body documentation when completed. Also, that it only references currently available accredited provision, as well as containing a clearly defined section for recording remedial actions to be taken following external quality assurance activity.</p> <p>Again, as part of the policy review, it may wish to ensure that further developments around standardising the good practice of direct observation cover all aspects of remote delivery and assessment of SQA accredited qualifications.</p>
5. Principle 7	Alcohol Focus Scotland may wish to ensure that the draft <i>Archimedes User Guide</i> is further reviewed to ensure that the

	language used is appropriate, fit for purpose and free from potential misinterpretation and assumptions of bias.
6. Principles 7 and 15	Alcohol Focus Scotland may wish to update SQA Accreditation on the use of e-certification, and any cases of late certification of SQA accredited qualifications. It may also wish to provide stakeholders with appropriate advice and information (eg via a website) on the impact of the current COVID-19 pandemic on customer service timescales.
7. Principle 10	Alcohol Focus Scotland may wish to introduce a formal and documented process for recording potential instances of disruption during delivery and/or assessment of SQA accredited qualifications. This would support the awarding body's quality assurance activities and complement relevant video evidence.

1.4 Risk Rating of Issues

SQA Accreditation assigns a rating to each Issue recorded, depending on the impact on or risk to the awarding body's operations, its SQA accredited qualifications and/or the learner. Issues recorded during the audit will count towards Alcohol Focus Scotland'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 Detail of Audit Issues and Recommendations

The following sections detail Issues recorded and Recommendations noted against SQA Accreditation's regulatory requirements.

2.1 Issues

No Issues were recorded during this audit.

2.2 Recommendations

Regulatory Principle 2. The awarding body shall ensure it has the necessary resources to effectively carry out its operational functions to meet regulatory requirements.

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

and

Regulatory Principle 10. The awarding body shall ensure that it has the necessary arrangements and resources for the effective delivery, assessment and quality assurance of SQA accredited qualifications.

Prior to the audit, the audit team were able to review sample videos of assessments for the Licensing Board Members qualification, R216 04, that took place in December 2020 and January 2021. In the main, it was evident that the assessment process was being carried out effectively enough to assure the audit team that the individual assessments were robust.

However, with regard to invigilation, it was noted that not all the steps outlined in the awarding body's *Remote Delivery & Invigilation Strategy* had been carried out in full, or in some cases at all, across the sample. Examples include guidance to learners on time keeping, and a full visual check of the assessment environment. A consistent approach is important on the latter issue, as there were cases where the invigilator challenged the appropriateness of the assessment location and requested that the learner relocate.

Through previous meetings with key personnel, the audit team were aware that developing a remote approach to delivery, assessment and invigilation in response to the COVID-19 pandemic, was a challenge for the learning and development team, given time constraints and limited resources. Despite this, the awarding body was able to commence remote activity, with teaching being shared across a small number of trainers. Assessment and invigilation were the responsibility of a single staff member, in every instance, to allow for adjustments and evaluation of the methodology used.

The audit team appreciated the rationale for this approach but felt that the lack of a consistent approach seen in the videos was not only a consequence of the various circumstances that arose during the assessments. The use of a single invigilator for each of the one-to-one assessments was fatiguing for the invigilator.

The audit team believes that increased resourcing, as well as a formal and standardised approach to invigilation, is essential to ensure that the current approach to remote assessment remains sustainable over an intense cycle of qualification delivery and assessment, such as the three-month period following the Scottish council elections in 2022.

Therefore, Alcohol Focus Scotland may wish to consider the introduction of a formal invigilation checklist, based upon the relevant sections of the awarding body's *Remote Delivery & Invigilation Strategy*, to support standardisation across qualification assessment.

The awarding body may also wish to consider allocating additional staff resources to ongoing e-assessment activity, should it be required through to 2022 and beyond.

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

Regulatory Principle 3. The awarding body shall have clearly defined business planning processes which show evidence of management commitment, decision making and ongoing review.

The awarding body provided the auditors with a run through of the operational aspects of the Archimedes CRM database. The auditors found the database to be clear, concise and logical, while recognising that certain areas, although functional, are still at the development and implementation stage. Updates will be provided as and when appropriate.

Currently, the database is open to all Alcohol Focus Staff once they have signed into the awarding body's network. The audit team fully understands the rationale for this, given the all-encompassing purpose of customer relationship management. However, it was noted that this approach means 'open access' to learner personal data retained in the training section of the CRM the database.

Under the Data Protection Act (2018), the awarding body is responsible for using personal data, and has to follow strict rules called 'data protection principles'. The last of these principles states that the organisation must make sure the information is 'handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage'.

With the above in mind, as database functionality increases and develops, Alcohol Focus Scotland may wish to consider future access requirements/limits around aspects of the Archimedes CRM system which contain learners' personal data.

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

Regulatory Principle 3. The awarding body shall have clearly defined business planning processes which show evidence of management commitment, decision making and ongoing review.

and

Regulatory Principle 4. The awarding body shall continually review the effectiveness of its business services, systems, policies and processes.

The audit team were provided with an overview of Alcohol Focus Scotland's approach to business continuity. It was noted that a corporate business continuity plan existed for the organisation and that this is managed through senior management and operational meetings, with adaptations to the plan incorporated into the organisation's risk register. However, it was also noted that the business continuity plan and risk register have not been updated to reflect the impact of the pandemic on the business to date.

Consequently, the *Business Planning and Reporting document (Doc 10)*, June 2017, and the redacted sample of the risk register on SQA Info Centre are not current. It is therefore difficult to confirm the process outlined by awarding body representatives.

Therefore, Alcohol Focus Scotland may wish to provide SQA Accreditation with a copy of its current business continuity plan and risk register, followed by appropriately updated versions of both documents reflecting audit discussion on the process for updating, as well as actual operational changes in response to the COVID-19 pandemic.

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

Regulatory Principle 6. The awarding body and its providers shall maintain accurate documents, records and data.

and

Regulatory Principle 10. The awarding body shall ensure that it has the necessary arrangements and resources for the effective delivery, assessment and quality assurance of SQA accredited qualifications.

It was noted during discussions that Alcohol Focus Scotland is still reviewing its *AFS Quality Assurance Policy (August 2017)*. This is to ensure that it incorporates relevant approaches to remote external quality assurance, given developments in online delivery and assessment of SQA accredited provision.

A review of the External Quality Assurance (EQA) report, covering the period 24/11/20 to 14/12/20, noted that it was difficult to specifically identify awarding body documentation that underpinned certain recommendations noted in the report.

The review also noted references in the template report to an SQA accredited training qualification that is no longer available. There was also no specific section for recording actions for improvement to be undertaken by the awarding body.

However, in the main, the audit team found the report to be comprehensive and informative. They also noted the proactive approach to quality assuring a substantial amount of recorded and live remote delivery and assessment. This is to be commended, as it will go some way to supporting the proposed changes to the *AFS Quality Assurance Policy (August 2017)*.

In particular, the audit team were pleased to note the standardised approach to direct observation of live delivery of SQA qualifications. To avoid undue pressure on both the learner and trainer, this had been conducted at the outset of the training, which the audit team considered to be good practice. However, in future, where appropriate, they would like to see observation cover full delivery and assessment across a given sample.

Therefore, as part of the proposed *AFS Quality Assurance Policy (August 2017)* review, Alcohol Focus Scotland may also wish to review the EQA report template. When completed it would specifically reference key awarding body documentation, and only reference currently available accredited provision. It would also contain a clearly defined section for recording remedial actions to be taken following external quality assurance activity.

Again, as part of the policy review, it may wish to ensure that, as good practice of direct observation is further standardised, this covers all aspects of remote delivery and assessment of SQA accredited qualifications.

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

Regulatory Principle 7. The awarding body shall have effective arrangements for communicating with its staff, stakeholders and SQA Accreditation.

The audit team were able to review a draft copy of the *Archimedes User Guide* prior to the audit. Aimed at system users within Alcohol Focus Scotland, it was found in the main to be clear, concise and user friendly.

The audit team felt that, as a draft document, some of the language and examples used, and the thought processes behind them, were still at a rudimentary stage, and certainly did not reflect the functional CRM database.

Therefore, Alcohol Focus Scotland may wish to ensure that the draft *Archimedes User Guide* is further reviewed to ensure that the language used is appropriate, fit for purpose and free from potential misinterpretation and bias.

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

Regulatory Principle 7. The awarding body shall have effective arrangements for communicating with its staff, stakeholders and SQA Accreditation.

and

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

It was noted in the EQA report, covering the period 24/11/20 to 14/12/20, that a reference was made to late certification. The audit team enquired if there had been any cases of late certification of SQA accredited qualifications. The awarding body representatives were unable to confirm whether there had been any late certification of *Licensing Board Members* and *Licensing Standards Officers* qualifications, R216 04 and R016 04.

Awarding body representatives suggested that the comment in the EQA report may have referred to either non-regulated provision or SQA accredited provision delivered on behalf of another awarding body. In particular, there may have been delays in issuing hard copy certificates within published customer service timescales because the main office was closed due to COVID-19 lockdown.

Also, during the discussions, reference was made to e-certification. As SQA Accreditation was unaware that Alcohol Focus Scotland used e-certification, the audit team asked for further clarification. As with late certification, the awarding body representatives were unable to fully confirm if e-certification was in use.

Therefore, Alcohol Focus Scotland may wish to update SQA Accreditation on the use of e-certification, and any cases of late certification of SQA accredited qualifications. It may also wish to provide stakeholders with appropriate advice and information (eg via a website) on the impact of the current COVID-19 pandemic on customer service timescales.

This has been noted as **Recommendation 6**.

Regulatory Principle 10. The awarding body shall ensure that it has the necessary arrangements and resources for the effective delivery, assessment and quality assurance of SQA accredited qualifications.

The review of the sampled videos, previously noted as part of Recommendation 1, highlighted several cases of disruption during the assessment process. The audit team were content that the invigilator handled these appropriately to reduce the impact on the assessments.

However, to ensure appropriate evidence is retained, the audit team would recommend that a formal method of noting such cases is introduced. This would complement the video evidence and support both internal and external quality assurance activity. This could also act as an alternative record of events if the video evidence is damaged or deleted.

Therefore, Alcohol Focus Scotland may wish to introduce a formal and documented process for recording potential instances of disruption during delivery or assessment of SQA accredited qualifications. This would support the awarding body's quality assurance activities and complement relevant video evidence.

This has been noted as **Recommendation 7**.

3 Acceptance of Audit Findings