



Audit Report

Alcohol Focus Scotland

25 January 2024

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1 Background

This was the seventh audit of Alcohol Focus Scotland (AFS) since it was approved as an awarding body by SQA Accreditation on 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.

This was a scoped and in-person 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 that Alcohol Focus Scotland complies with SQA Accreditation's regulatory requirements namely:

- ◆ *SQA Accreditation Regulatory Principles (2021)*
- ◆ all *Regulatory Principle 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: 25 January 2024

Audit Report approved by
Accreditation Co-ordination Group on: 19 April 2024

Audit Report to be signed by Alcohol Focus Scotland: 19 April 2024

Action Plan to be emailed
to regulation@sqa.org.uk by Alcohol Focus Scotland: 19 April 2024

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 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 copy of the Action Plan and return by email to SQA Accreditation.

The findings of this Audit 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 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 Issue and specify corrective and preventative measures to address it through the Action Plan.

The Action Plan is emailed to Alcohol Focus Scotland as a separate document to the Audit Report and must be submitted to SQA Accreditation in accordance with the timescale specified in 1.2.

As a result of the audit and post-audit activities, one Issue has been recorded and five Recommendations have been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principle 13	The audit team considers that it is now a matter of urgency that Alcohol Focus Scotland effectively plans, resources, and implements a programme of external quality assurance.	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. Principle 1	The awarding body may wish to emphasise the need to proactively update declaration forms, as well as considering providing a sample of completed forms on SharePoint.
2. Principle 4	The audit team believes that Alcohol Focus Scotland should consider providing at least a redacted version of the current Risk Register on SharePoint as a means of demonstrating to SQA Accreditation that it effectively considers and manages risk.
3. Principle 5	<p>Alcohol Focus Scotland representatives noted the intention to develop a joint communications plan with SOLAR as a means to mitigate issues with scheduling training in advance of the next peak delivery period linked to the Scottish Council elections in 2027.</p> <p>The awarding body may wish to provide SQA Accreditation with a copy of the finalised communications plan for information when available.</p>
4. Principles 9, 12 and 13	Going forward, Alcohol Focus Scotland may wish to agree a programme of review meetings with the third-party organisation undertaking remote invigilation as a means of ensuring that there continues to be a flexible and learner focused assessment and invigilation platform.
5. Principle 16	Alcohol Focus Scotland may wish to review all documentation in respect of complaints to ensure that there is a consistent and clear message regarding the escalation instances to the qualification regulator at the earliest opportunity.

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

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.

As a consequence of provider monitoring activity conducted in September 2022 the following Issue was recorded:

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.

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).

The awarding body carried out retrospective external quality assurance activity for the period May 2020 to March 2023, supplying a report covering the period, which after requested amendments, was considered sufficient evidence to contribute to closing the Issue by August 2023.

Also, as part of the evidence to close the Issue, the awarding body chose to revise its approach to quality assurance, submitting the *AFS Quality Assurance Policy, Version 4*, as further evidence of its commitment to conduct effective and robust external quality assurance. This revised document states that, 'Alcohol Focus Scotland registered centres will be subject to a minimum of one external quality assurance report per year. This report will summarise the findings from external quality assurance activities.'

During 2023, the Lead Auditor held several meetings with awarding body representatives to discuss potential approaches to externally quality assuring both the Licensing Board Members' Qualification at SCQF level 6, R764 04, and the Licensing Standards Officers' Qualification at SCQF level 6, R794 04, across the extremes of the post-Scottish Council elections bulk delivery period and the remaining low uptake periods between elections. This included the need for adequate resources to carry out the role, planning, and sampling approaches to cover key functions, as well as timescales for summative reporting.

AFS representatives subsequently confirmed that the awarding body was 'working on a resilience plan around EV capacity.' Also, that consideration had been given to devising a

job description for the role, as well as a number of potential candidates for the role having been identified.

Given the work to produce and re-establish an effective programme of external quality assurance across 2023, the audit team sought evidence that sufficient progress had been made in this respect by Alcohol Focus Scotland.

Unfortunately, there was no available evidence of external quality assurance activity having taken place in respect of course delivery post-March 2023. While accepting that the number of learners undertaking the accredited qualifications was significantly lower in this period to date, the audit team were concerned that, in respect of the awarding body's single approved centre, this left the awarding body in a position of potentially failing to comply with its own revised quality assurance policy by not ensuring annual external quality assurance. Likewise, there appeared to be no evidence of additional resourcing, planning, or consideration of sampling activity for the function to ensure that it took place on a regular and consistent basis.

However, in terms of capacity building in this area, awarding body representatives were able to confirm that they had now formally identified two potential individuals able to take on the external quality assurance role, and were close to finalising an appointment for one additional member of staff.

While considering this last point to be a positive development, the audit team is of the opinion that it is now a matter of urgency that Alcohol Focus Scotland effectively plans, resources, and implements a programme of external quality assurance.

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

2.2 Recommendations

Regulatory Principle 1. The awarding body must have an accountable officer and demonstrate that it has clearly defined and effective governance arrangements.

The awarding body details its approach to managing conflicts of interest in the document *Learning & Development, Conflicts of Interest, April 2021*.

The document provides:

- ◆ a clear definition of conflict of interest
- ◆ examples of definitions of conflicts of interest
- ◆ the potential impact on the awarding body should conflicts of interest be present
- ◆ a sufficiently robust process for disclosing conflicts of interest
- ◆ a *Conflict of Interest Declaration Form*

While content that the process for managing conflicts of interest is sufficiently robust, the awarding body may wish to emphasise the need to proactively update declaration forms, as well as considering providing a sample of completed forms on SharePoint.

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

Regulatory Principle 4. The awarding body must demonstrate an effective approach to the identification and management of risk.

The Alcohol Focus Scotland *Self-Assessment 2022 - 2023*, as well as the *Director's Annual Report and Financial Statements for the Year ended 31 March 2023*, refer to the awarding body's Risk Register.

As this was unavailable on SharePoint, the audit team requested access to the Risk Register on the day of the audit. Awarding Body representatives provided access and talked through a number of risks that were currently impacting the business.

While accepting that the Risk Register may contain corporate and commercially sensitive information, the audit team believes that Alcohol Focus Scotland should consider providing at least a redacted version of the current Risk Register on SharePoint as a means of demonstrating to SQA Accreditation that it effectively considers and manages risk.

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

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.

Alcohol Focus Scotland works with a range of stakeholders as it plans and delivers training and assessment linked to the Licensing Board Members' Qualification at SCQF level 6, R764 04, including the Society of Local Authority Lawyers and Administrators in Scotland (SOLAR).

In discussing factors which could potentially contribute to pass and fail rates for the qualification, as outlined in the *Report from Internal Quality Assurance Meeting on Wednesday 2nd August 2023* which was kindly provided on the day of the audit, awarding body representatives noted the intention to develop a joint communications plan with SOLAR as a means to mitigate issues with the scheduling of training in advance of the next peak delivery period linked to the Scottish Council elections in 2027.

The audit team considers this to be a particularly positive development and would encourage the awarding body to provide SQA Accreditation with a copy of the finalised communications plan for information, when available.

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

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

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.

And

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.

Alcohol Focus Scotland has established an agreement with a third-party organisation to provide an assessment and invigilation platform for the delivery of the Licensing Board Members' Qualification at SCQF level 6, R764 04.

Through the discussions with awarding body representatives that took place following SQA Accreditation's provider monitoring activity in September 2022, the audit team was conscious that regular meetings had occurred between the awarding body and the third-party provider to mitigate any ongoing issues with the training and assessment during the peak period post-Scottish Council elections.

As part of the audit, clarification was sought on the formal review arrangements agreed as part of the contractual arrangement between both parties. Awarding body representatives noted that the contract contained no such review arrangements and that the previous meetings had been ad hoc to address specifically identified issues.

It should be noted that awarding body representatives considered these meetings to be a largely positive experience with the relevant Customer Service Manager. However, it was noted that such meetings have not continued during this period of low uptake of the qualification.

In the opinion of the audit team, Alcohol Focus Scotland may wish to agree a programme of review meetings with the third-party organisation undertaking remote invigilation as a means

of ensuring that there continues to be a flexible and learner focused assessment and invigilation platform.

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

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

The awarding body's *Awarding Body Regulations, Version 8*, provides sufficient information on how a complainant can escalate a potential complaint to SQA Accreditation. This includes an appropriate link to SQA Accreditation's *Regulatory Complaints Handling Procedure, Version 3 (August 2021)*.

However, the *Complaints Procedure* present on the awarding body website, as well as the version on SharePoint, omits the information regarding the escalation process.

Alcohol Focus Scotland may wish to review all documentation in respect of complaints to ensure that there is a consistent and clear message regarding the escalation instances to the qualification regulator at the earliest opportunity.

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

3 Acceptance of Audit Findings