



Audit Report

City & Guilds

20 January 2022

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1 Background

This was the fourteenth audit of City & Guilds since it was approved as an awarding body by SQA Accreditation in 1995.

City & Guilds is a nationally recognised awarding body whose services include providing and delivering qualifications across a wide variety of industry sectors. Its headquarters are at Giltspur House, 1 Giltspur Street, London, EC1A 9DD.

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 City & Guilds, focusing upon business continuity planning, third-party remote invigilation, and late registration and certification of candidates, only specific regulatory requirements were included in the scope. 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 City & Guilds complies with SQA Accreditation's regulatory requirements namely:

- ◆ *SQA Accreditation's Regulatory Principles (2021)*
- ◆ *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 City & Guilds' 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

City & Guilds audit date: 20 January 2022

Audit Report approved by
Accreditation Co-ordination Group on: 23 February 2022

Audit Report to be signed by City & Guilds: 6 April 2022

Action Plan to be emailed
to regulation@sqa.org.uk by City & Guilds: 6 April 2022

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 Issues and specify corrective and preventative measures to address them through its Action Plan.

The Action Plan is emailed to City and Guilds 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, two Issues have been recorded and three Recommendations have been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principle 15	<p>City & Guilds must ensure that the Customer Service team adheres to the guidance provided in the awarding body's own <i>SQA Closed Qualification Process</i>, as well as SQA Accreditation's <i>Guidance on Submitting Data to SQA Accreditation, Version 7, 06 November 2019</i>, which notes:</p> <p>"If the awarding body has received approval to process certificates for expired qualifications by their Regulation Manager, this information must be included with the data submission."</p> <p>To offset delays in SQA Accreditation's Information Assistant being able to process such data, this must now include the date of approval by the Regulation Manager. Late certifications that do not have this information available should not be included in a quarterly data submission.</p> <p>Also, given the evidence of requests for the re-registration of candidates, the awarding body must also review all late registrations undertaken, against SQA accredited provision, from 1 January 2020 to ensure that these do not constitute an actual re-registration of candidates, resulting in inaccurate registration data.</p>	Medium
2. Principle 15	A review of documentation noted that the document titled, <i>Closed Qualifications Work</i>	Very Low

	<p><i>Flow (SQA Requests), Version 4.2, 10 May 2016</i>, was still present on SharePoint, despite previously being updated.</p> <p>City & Guilds must ensure that the most current version is available on SharePoint and available to staff responsible for processing late certification claims of SQA accredited qualifications.</p>	
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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 13	City & Guilds may wish to undertake a more detailed review of candidate feedback following the launch of 'Record and Review' to ensure that the level of support provided remains fit for purpose and avoids becoming a barrier to assessment.
2. Principle 13	Given the proposal to move to less 'live' invigilation through the launch of 'Record and Review', City & Guilds may wish to consider enhancing its external quality assurance activity through the observation of remotely invigilated assessments as a third attendee in the virtual meeting session, as specified in its <i>On-demand e-volve testing at home: Instructions for remote invigilation, Version 1.1, May 2020</i> .
3. Principle 15	<p>Discussions linked to Issue 1 highlighted that the Customer Service team, dealing with late registrations and certifications (closed qualifications), had seen a turnover in personnel. With the above in mind, City & Guilds may wish to update SQA Accreditation on the structure and membership of the current team.</p> <p>Also, given the above changes, and the previously noted decision that City & Guilds is no longer required to formally notify the Regulation Manager of the late registration of candidates, the awarding body may wish to share with SQA Accreditation its updated training materials, the <i>SQA Closed Qualification Process</i>, which reflects this change of process.</p>

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 City & Guilds' 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 15. The awarding body must have effective, reliable and secure systems for the registration and certification of learners.

SQA Accreditation has noted the recurrence of issues around the reporting of late registrations and the request for approval of late certifications which were addressed as part of the 2018 and 2019 City & Guilds audits.

For example, the Regulation Manager has received requests to 'approve' late registrations, despite this not being a requirement of the awarding body. Such requests continued to arrive despite the Regulation Manager indicating as much and noting that the requirement was to simply notify SQA Accreditation of such registrations for tracking purposes linked to late certification requests.

It was also noted that on several occasions such 'approval' requests were submitted on an amended *Late Certification Request Form*. The title of the forms being altered to reflect the late registration request.

Of greater concern to the audit team was the re-emergence of requests for the re-registration of candidates. A single request was noted on 10 December 2021 to re-register two candidates against two accredited qualifications. As noted at the 2018 audit, although an internal process of finite registration periods and subsequent re-registrations is used by City & Guilds to track candidate progress to achievement, there is a danger of conflating such activity with the recording of new registrations, which could lead to inaccurate registration data within submitted quarterly returns to SQA Accreditation.

There was also an inconsistent approach to the use of qualification codes, with a number of requests for both late registrations and certifications failing to include the qualification code allocated by SQA Accreditation following accreditation, opting instead to use City & Guilds own allocated qualification codes.

Lastly, the data returns for Quarter 2, covering the period 1 July to 30 September 2021, highlighted several discrepancies around approved late certification requests, with SQA Accreditation's Information Assistant unable to gain confirmation from City & Guilds that several requests had been approved by the Regulation Manager, given the fact that the suggested overall total did not match that recorded in the regulator's Quality Enhancement Rating Database (QERD). This resulted in doubts around the accuracy of the data previously provided in respect of late certifications, with delays in resolving the matter placing undue pressure on the Information Assistant to meet internal customer service timescales for subsequently collating the data for inclusion in the appropriate report, (Quarterly or Annual), which is published approximately four weeks after the original data submission.

City & Guilds representatives acknowledged the re-occurrence of these issues, citing the impact of the COVID-19 pandemic on awarding body operations and a turnover of personnel within the Customer Service team, that deals with late registrations and late certifications (closed qualifications), as a partial cause for the difficulties in this area.

The audit team acknowledged the awarding body's reasoning but emphasised the importance of steps being taken to ensure that the issues are addressed as a matter of urgency.

Therefore, City & Guilds must ensure that the Customer Service team adheres to the guidance provided in the awarding body's own *SQA Closed Qualification Process*, as well as SQA Accreditation's *Guidance on Submitting Data to SQA Accreditation, Version 7, 06 November 2019*, which notes:

"If the awarding body has received approval to process certificates for expired qualifications by their Regulation Manager, this information must be included with the data submission."

To offset delays in SQA Accreditation's Information Assistant being able to process such data, this must now include the date of approval by the Regulation Manager. Late certifications that do not have this information available should not be included in a quarterly data submission.

To help streamline the process and facilitate a speedy return to accurate data submissions, the Regulation Manager is content that City & Guilds no longer needs to provide direct notification of late registrations. SQA Accreditation will be able to continue to monitor such registrations via the quarterly data returns. Should information be required about late registrations against specific accredited qualifications, a direct request will be made by the regulator.

Given the evidence of requests for the re-registration of candidates, the awarding body must also review all late registrations undertaken, against SQA accredited provision, from 1 January 2020 to ensure that these do not constitute an actual re-registration of candidates, resulting in inaccurate registration data.

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

And

At the previous City & Guilds audit, held on 21 and 22 February 2018, the following Recommendation was noted:

During pre-audit discussions in respect of late certifications, SQA Accreditation was provided with a copy of a document titled Closed Qualifications Work Flow (SQA Requests), Version 4.2, 10 May 2016, as evidence of how City & Guilds manages requests for late certifications.

The document indicates that a key stage of the process is for a member of the Customer Service team to seek approval for late certification requests from the Head of Accreditation in SQA Accreditation.

This is incorrect and the awarding body may wish to update the document to reflect that fact all such requests should be directed to the relevant Regulation Manager within SQA Accreditation for consideration.

City & Guilds subsequently provided an amended process map which reflected current practice when seeking approval of late certifications from SQA Accreditation.

However, a review of documentation as part of the most recent audit preparation noted that the *Closed Qualifications Work Flow (SQA Requests), Version 4.2, 10 May 2016* was still present on SharePoint.

The audit team are confident that this version has not been used in requesting late certification approval from SQA Accreditation. Nonetheless, the awarding body must ensure that the most current version is available on SharePoint and available to staff responsible for processing late certification claims of SQA accredited qualifications.

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

2.2 Recommendations

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 result of SQA Accreditation's provider monitor activity focusing upon the *Scottish Certificate for Personal Licence Holders at SCQF Level 6, R652 04*, the audit team were able to view video evidence of both online assessment using City & Guilds e-volve tests and remote invigilation, the latter being delivered through the third-party, Talview, using the latter's Proview platform.

In respect of the remote invigilation, the audit team were particularly impressed with level of one-to-one support provided to candidates by the Invigilators, which was demonstrated through their knowledge of City & Guilds system for remote assessment and the patient way they successfully guided candidates to the point where they could undertake an assessment with minimum stress. Candidate feedback has also noted the level of support provided as a particular positive.

As part of the audit, City & Guilds provided an overview of the full invigilation process. This included appropriate service timelines, the role played by artificial intelligence (AI) in identifying potential malpractice, as well as the respective screens seen by both the candidate and the Invigilator.

It was noted that the invigilation process contained a 'Record and Review' option which involved greater automation of the process and a resultant reduction in direct one-to-one support, as there will be no 'live' invigilation component to the assessment process. City & Guilds representative indicated that the intention is to launch this option in Spring 2022.

In doing so, the awarding body believes that there will be an opportunity to increase the number of exams that can be taken at any one time, as well as a potential increase in exam slots through weekend and evening sessions becoming available. Whilst acknowledging this, the audit team noted some concerns around the loss of 'live' and immediate candidate support from Invigilators, given how positively it has been received.

The awarding body representatives advised that they believe that the current array of available published guidance on remote assessment and invigilation, which the audit team consider to be of a high standard, and the continued availability of a dedicated 24/7 support link and telephone number will mitigate such concerns.

Nonetheless, City & Guilds may wish to undertake a more detailed review of candidate feedback following the launch of 'Record and Review' to ensure that the level of support provided remains fit for purpose and avoids becoming a barrier to assessment.

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

As part of the overview of the online invigilation process, the audit team requested an insight into City & Guilds external quality assurance of the system.

The awarding body receives a detailed weekly report from Talview, which includes every booking over the previous week. The report includes candidate comments, candidate satisfaction rating, as well as Invigilator feedback. The Examination Management team review this report each week and identify any aspect of the assessment that needs further investigation based on the comments and/or the satisfaction rating.

Thereafter, the Examination Management team will play back the recordings of those assessments that have been flagged for further investigation and will raise any concerns with the relevant teams in City & Guilds. Any concerns will also be raised with Talview with the aim of identifying areas for immediate action, improvement, or development.

The audit team identified no major concerns with the current process but given the proposal to move to less 'live' invigilation through the launch of 'Record and Review', City & Guilds may wish to consider enhancing its external quality assurance activity through the observation of remotely invigilated assessments as a third attendee in the virtual meeting session, as specified in its *On-demand e-volve testing at home: Instructions for remote invigilation, Version 1.1, May 2020*. Based upon a risk and/or sampling model, the implementation of such an approach would complement the information provided post-assessment by Talview.

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.

As noted during the discussions linked to Issue 1 above, it was highlighted that the Customer Service team, dealing with late registrations and late certifications (closed qualifications), had seen a turnover in personnel. With the above in mind, City & Guilds may wish to update SQA Accreditation on the structure and membership of the current team.

Also, given the above changes, and the previously noted decision that City & Guilds is no longer required to formally notify the Regulation Manager of the late registration of candidates, the awarding body may wish to share with SQA Accreditation its updated training materials, the *SQA Closed Qualification Process*, which reflects this change of process.

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

3 Acceptance of Audit Findings