



Audit Report

City & Guilds

20 February 2019

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1 Background

This was the 13th 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 policy 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 audit of City & Guilds based upon — but not limited to — the awarding body's operational activities in respect of Regulatory Principles 1, 8, 9, 10 and 15.

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* (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 City & Guild'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

City & Guilds audit date: 20 February 2019

Audit Report approved by
Accreditation Co-ordination Group on: 27 March 2019

Audit Report to be signed by City & Guilds: 10 May 2019

Action Plan to be e-mailed
to regulation@sqa.org.uk by City & Guilds: 10 May 2019

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

- ◆ The awarding body will be sent two signed copies of the Audit Report by post.
- ◆ The awarding body must sign both copies of the Audit Report and return one by post to SQA Accreditation in accordance with the timescale specified above.
- ◆ The awarding body will also be e-mailed a copy of the Audit Report (for information only) and an electronic copy of the Action Plan.
- ◆ The awarding body must complete and return the Action Plan in accordance with the timescale specified above and e-mail 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 two signed copies of the approved Action Plan by post.
- ◆ The awarding body must sign both copies of the Action Plan and return one by post 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 e-mailed to City & 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 five Recommendations have been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principles 6, 7, 15 and Regulatory Principles Directive 2	<p>SQA Accreditation has noted 'late' registrations, as well as requests for late certification, throughout 2018. A number of these notifications and certification requests were considered unnecessary or erroneous, as a consequence of candidate re-registration, suggesting that there remained a lack of understanding of the qualification regulator's requirements for both processes.</p> <p>SQA Accreditation also noted concerns regarding ongoing communication with City & Guilds regarding the management of individual registration and certification scenarios.</p>	Medium
2. Principles 7 and 15	<p>City & Guilds failed to effectively manage the process for late certification requests over 2018 in line with <i>SQA Accreditation's Regulatory Principles Directive Note – Principle 15, Requesting certification for Expired Qualifications, June 2017.</i></p>	Medium

A Recommendation has been noted where SQA Accreditation considers there is potential for improvement. The awarding body is advised to address any Recommendations noted as good practice. 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 1 and 8	City & Guilds may wish to ensure that SQA Accreditation is appraised of the activities that underpin the new partnership review process, with particular emphasis on the content of the proposed framework categories for Scotland, as well as the impact on SQA accredited provision.
2. Principle 9	Given the perceived lack of awareness of educational policy in Scotland and the emphasis placed on Modern Apprenticeships by the Scottish Government, City & Guilds may wish to review its process around the review of products, as outlined in the <i>Product Review Process, Version 3.5 - May 2018</i> , to further reflect both the type and currency of legislative and educational policy that may have an impact on qualification review.
3. Principle 9	City & Guilds may wish to undertake an analysis of why qualifications in Light Vehicle Maintenance and Heavy Vehicle Maintenance continue to generate requests for late registrations. Thus determining if there is an identifiable reason for the recurrence of such requests and aiming to find a potential solution before the next accreditation end date.
4. Principles 10 and 15	City & Guilds may wish to provide SQA Accreditation with a copy of the relevant EQA correspondence to confirm that the candidate registered for the SVQ 2 Production Horticulture at SCQF level 5, reported in Quarter 1 data returns (April to June 2018), constitutes a re-registration and has been accounted for in the process of transferring candidates to equivalent Ofqual recognised provision.
5. Principle 10	<p>In support of a late certification for a number of candidates 'who have missed one online examination' which formed part of an assessment for one unit in the Diploma in Light Vehicle Maintenance & Repair at SCQF Level 5, R171 04. City & Guilds may wish to provide a copy of the formal mapping that evidences that 100% of the assessable content present in the original online exam is also present in the most current version.</p> <p>The awarding body may also wish to provide details of how the situation arose at centre level, how many candidates and centres are affected, and what actions have been taken by EQA's to ensure that the qualification has been completed in full.</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 & 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 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 6. The awarding body and its providers shall maintain accurate documents, records and data.

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

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

And

Regulatory Principles Directive RPDIR — 2 Data Submissions

At the City & Guilds audit of 21 and 22 February 2018, an issue was found (Issue 3) that resulted in re-registrations being reported in the quarterly data submissions as 'new' or 'late' candidate registrations. The auditors found a conflation of the awarding body's internal process for re-registering learners with the process of formally registering a candidate for an SQA accredited qualification.

At the audit, City & Guilds representatives noted that candidates are normally registered on the awarding body's learner management system for a 'fixed' period of three years. Three years is the average length of time that the awarding body believes is required for a candidate to complete a qualification.

It was also stated that the purpose of this fixed registration period is to allow both the awarding body and provider to track progress towards candidate achievement. It can be renewed should the candidate require more time to complete, or where a specific qualification is considered to have an average completion time greater than the initial three years.

Despite guidance being created by the awarding body to mitigate the issue, there has been a continued notification of perceived 'late' registrations, as well as requests for late certification, throughout 2018. SQA Accreditation considered a number of the registration and certification requests to be unnecessary or erroneous, suggesting that there remained a lack of understanding of the qualification regulator's requirements for both processes.

In an attempt to gain clarity and a better understanding of the awarding body's process for the re-registration of learners, and the reasons for this ongoing conflation with SQA Accreditation requirements, the qualification regulator sought a more detailed view of the awarding body's registration and certification process using a number of the submitted requests.

On viewing the system for registration, it became clear that the 'fixed' registration period for a candidate is actually based, to some extent, on the accreditation dates given to SQA provision at the point of accreditation. However, in the opinion of the audit team, this internal process remains problematic because of its focus on the accreditation end date as a trigger point for candidate re-registration. In effect, this exacerbates any element of confusion and misunderstanding, when considered in the context of late registrations as defined by SQA Accreditation.

On working through a sample of the late registration notifications received since the last audit, the auditors were able to confirm that a number of them were erroneously triggered by the re-registration process used by City & Guilds.

The Lead Auditor noted that queries raised to this effect in response to City & Guilds's initial notifications resulted in no subsequent communication from the awarding body. This left SQA Accreditation unclear on the outcome and impact of the original notifications. This lack of ongoing communication also suggested that there remained a lack of understanding of the nature of the problem on the part of the Customer Service Advisors.

City & Guilds Customer Service Team Leader acknowledged the failure in ongoing communication with the qualification regulator and advised that all Customer Service Advisors will be provided with one-to-one training and guidance to increase greater understanding of the differences between re-registration and 'late' registration as a means of mitigating any ongoing problems. The Lead Auditor has offered to support any review of this strategy should the awarding body feel this would be useful.

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

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.

City & Guilds's Customer Service Team Leader indicated that given the findings of the 2018 audit, some detailed research had been conducted into the issues around re-registration, late registration notifications and late certification requests.

This research indicated that there were potentially around 20 late certifications processed by the awarding body since January 2018 that had not been identified to SQA Accreditation.

Using a list of the suggested 20 late certifications, the possible reasons for them were briefly discussed. It was suggested that six of the late certifications may have been a consequence of providers processing the result on the actual accreditation end date, and as City & Guilds systems only update overnight, being noted as late as a consequence of a 'systems lag'.

Two other late certifications may be the result of a delay in an online exam being processed near to the certification end date. One further instance was suggested as a consequence of the system suffering IT issues which meant it had to be 'pushed through', but five late certifications were definitely unknown to SQA Accreditation.

However, as the list itself was not provided to the audit team on the day, it was not possible to determine the validity of the suggested reasons for each scenario. As part of the resolution to this problem, City & Guilds must provide the list to allow SQA Accreditation to determine how many are genuine late certifications, and then take appropriate steps to manage them accordingly.

City & Guilds representatives indicated that further changes to the process for managing late certifications requests are ongoing, with the Customer Service Team Leader now personally tracking all potential requests as they are processed by the Customer Services Team, as well as having rewritten City & Guilds *Closed Qualifications Business Rules* document to ensure that it is current and fit for purpose.

Whilst recognising such positive steps, it remains the case that the awarding body failed to effectively manage the process for late certification requests over the last year in line with *SQA Accreditation's Regulatory Principles Directive Note – Principle 15, Requesting certification for Expired Qualifications, June 2017*.

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

2.2 Recommendations

Regulatory Principle 1. The awarding body shall have clearly defined and effective governance arrangements.

And

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

Following discussions at the audit on 21 and 22 February 2018 in respect of partnership working at City & Guilds, the awarding body submitted a document titled *City & Guilds Partnership Review – Qualifications in Scotland*. This document outlines how the management of partnerships will be reviewed across the City & Guilds Group in respect of Scotland.

Managed by City & Guilds' Strategic Partnership Manager, the objective is to identify and consolidate partnerships across the group. This will be carried out by working with the Senior Executive Team to understand all new bids and tenders, as well as monitoring the current partnerships that exist within the group. The ultimate aim is to develop a 'live' customer relationship management (CRM) database which will, with the exception of IT and the sales-related partnerships, provide a stakeholder map to assist in developing strategic networks and relationships across industry managers and the communications and marketing teams, which may be currently 'separated by sectors and geographical areas'.

Currently, the Strategic Partnership Manager is undertaking a three month consultation exercise with industry managers and any other stakeholders with responsibility for Scotland. The outcome of this activity will be the development of a framework that categorises the different partnerships and relationships that City & Guilds has with stakeholders.

The framework proposes that partnerships are categorised by awarding bodies, regulatory bodies, sector skills councils and industry networks. Discussions focused on the nature and type of partnerships that may sit in each category. In respect of industry networks, the Strategic Partnership Manager indicated that this category and its relationship with that of sector skills councils was 'open to interpretation' but may be 'more commercially based'.

The audit team appreciate that such developments around partnership are at an early stage and are focused on City & Guilds activities across the United Kingdom. With this in mind, the awarding body may wish to ensure that SQA Accreditation is appraised of the activities that underpin the new partnership review process, with particular emphasis upon the content of the proposed framework categories for Scotland, as well as the impact upon SQA accredited provision.

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

Regulatory Principle 9. The awarding body shall ensure that it has robust systems and processes for the identification, design, development, implementation and review of qualifications, which meet the needs of users.

As noted in the 2018 audit report, City & Guilds noted the 'intention of the Industry and Products team to re-focus its attention on Scotland and the refreshed *Product Review Process*'.

As part of the current audit, SQA Accreditation sought a further update on progress in this area. Awarding body representatives provided access to the master report of all current City & Guilds qualifications 'open for registration and/or certification' and were able to interrogate it in respect of SQA accredited qualifications.

As part of the discussions, clarification was sought on the decision making process around the withdrawal of the SVQ 3 in Domestic Natural Gas Installation and Maintenance (ACS), G95A 23, given the fact that it was the only available mandatory qualification within the relevant EU Skills Modern Apprenticeship Framework.

City & Guilds representatives stated that legislative and educational policy requirements for each nation are taken into account as part of an in-depth review of any qualification product and helps inform the decision making process regarding future viability. This is partially referenced within the *Product Review Process, Version 3.5 - May 2018*.

However, in respect of the SVQ 3 in Domestic Natural Gas Installation and Maintenance (ACS), G95A 23, the awarding body representatives were unable to advise whether the impact on the Modern Apprenticeship Framework had been considered in the decision to withdraw the qualification.

A review of the relevant part of the master report showed that there were no references to the qualification being part of any Modern Apprenticeship Framework and the awarding body representatives were unsure as to how they would be able to source this information.

To facilitate immediate access to City & Guilds provision that is present within a range of Modern Apprenticeship Frameworks, SQA Accreditation's Information and Research Manager agreed to send a spreadsheet to this effect and advised that the same information is available through SQA Accreditation's listing and lapsing reports which are available via the qualification regulator's website.

Given the perceived lack of awareness of educational policy in Scotland and the emphasis placed on Modern Apprenticeships by the Scottish Government, City & Guilds may wish to review its process around the review of products, as outlined in the *Product Review Process, Version 3.5 - May 2018*, to further reflect both the type and currency of legislative and educational policy which may have an impact on qualification review.

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

At the previous audit of 21 and 22 February 2018, it was noted that City & Guilds had experienced a high volume of late registration requests in respect of the following Diplomas, all of which lapsed on 30 November 2016:

Diploma Light Vehicle Maintenance and Repair Principles at SCQF Level 5, R171 04
Diploma in Light Vehicle Maintenance and Repair Principles at SCQF Level 7, R172 04
Diploma in Heavy Vehicle Maintenance and Repair Principles at SCQF Level 5, R173 04
Diploma in Heavy Vehicle Maintenance and Repair Principles at SCQF Level 7, R174 04

It was noted that at the time of the 2018 audit that the existence of such late registrations and registration requests does not constitute a compliance issue in itself.

However, as the qualifications were subsequently re-accredited on 24 August 2016, with revised accreditation end dates of 31 August 2021, and as there were instances of late registration requests across the remainder of 2018 and early 2019 as noted in Issue 1, City & Guilds may wish to undertake an analysis of why this qualification area continues to be problematic. It can then determine whether there is an identifiable reason for the recurrence of such requests and aim to find a potential solution before the next accreditation end date.

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

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.

And

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

During the audit, City & Guilds representatives provided an update on the actions taken in respect of four suggestions outlined in SQA Accreditation's regulatory warning letter, dated 7 September 2018, with regard to Issue 3 of the provider monitoring report for the period 22 May 2017 to 03 August 2017 which noted failings in the assessment of the SVQ 2 Production Horticulture at SCQF level 5.

The audit team had no concerns around the rationale provided for actions taken around each of the suggestions but sought clarity around what appeared to be ongoing candidate registration against the qualification in question. One registration was noted within the data returns for Quarter 1, April to June 2018.

This was deemed a concern given the failings in the assessment process identified at the provider monitoring activity noted above, and the fact that City & Guilds had also sought to withdraw the qualification on 6 June 2018.

City & Guilds representatives stated that this was another instance of re-registering a candidate within awarding body systems, rather than a new candidate registration, and that it had been reported in quarterly data returns in error. They indicated that this had been checked by the relevant External Quality Assurer (EQA) and confirmed by email.

As awarding body representatives also noted that all remaining candidates registered for the SVQ had been transferred to the equivalent Ofqual recognised qualification, City & Guilds may wish to provide SQA Accreditation with a copy of the relevant EQA correspondence to confirm that the candidate in question is indeed a re-registration and has been accounted for in the transfer process.

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

Prior to the audit, SQA Accreditation received a late certification request, dated 15 February 2019, from City & Guilds's Customer Services Team Leader in respect of a number of candidates 'who have missed one online examination' which formed part of an assessment for one unit in the Diploma in Light Vehicle Maintenance & Repair at SCQF Level 5, R171 04. It was stated that all other work had been completed and submitted but, having discovered the missed online examination, centres were unable to retrospectively enter the candidates for the examination as City & Guilds systems noted that the qualification had expired as of 30 November 2018.

However, the qualification was re-accredited on 24 August 2016, and over-taken by the Diploma in Light Vehicle Maintenance & Repair at SCQF Level 5, R492 04, and awarding body representatives noted that the online examination is available as part of the current qualification. City & Guilds was seeking permission to allow candidates to sit the online examination for the current qualification and record it against the previous unit code using an 'internal equivalence' within City & Guilds systems. This would allow the candidates to be certificated for the original qualification and more importantly, be certificated for the relevant Modern Apprenticeship by IMI Sector Skills Council.

Further discussions took place around the issue during the audit and awarding body representatives indicated that 100% of the assessable content present in the original online exam is present in the current qualification and has been mapped accordingly.

As the intention is to avoid disadvantaging the learners in respect of both the qualification and the Modern Apprenticeship, the Lead Auditor agreed that City & Guilds could proceed with the proposed action on the understanding that evidence of a formal mapping is available.

However, the awarding body may also wish to provide details of how the situation arose at centre level, how many candidates and centres are affected, and what actions have been taken by EQA's to ensure that the qualification has been completed in full.

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

3 Acceptance of Audit Findings

For and on behalf of City & Guilds:

For and on behalf of SQA Accreditation:

Print name

Print name

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Signature

Signature

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Designation

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