



Audit Report

EduQual Ltd

23 February 2023

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1 Background

This was the second audit of EduQual since it was approved as an awarding body by SQA Accreditation on 21 March 2018.

EduQual is an awarding body operating internationally and delivering qualifications in Business Skills, Business Management, Medical Technology and Healthcare. It also offers a range of bespoke qualifications via the EduQual Customised Awards Service (ECAS). Current SQA accredited provision relates solely to the Medical Technology and Healthcare sectors.

EduQual is based in London.

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 remote audit of EduQual, and 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 EduQual 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 EduQual'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

EduQual: audit date:	23 February 2023
Audit Report approved by	
Accreditation Co-ordination Group on:	22 March 2023
Audit Report to be signed by EduQual:	9 May 2023
Action Plan to be emailed	
to regulation@sqa.org.uk by EduQual:	9 May 2023

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 EduQual 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 six Recommendations have been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principle 5	EduQual must ensure that approved centres accurately reflect qualification details, including the title, SCQF status and level, and code, as determined by the Accreditation Co-ordination Group (ACG).	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 5	EduQual may wish to review policies publicly available on its website to ensure that they are current and consistent with those held on SharePoint.
2. Principle 9	As part of its normal cycle of policy and document review, EduQual may wish to check that references to specific SQA Accreditation Regulatory Principles are current and accurately reflect those updated in 2021.
3. Principles 10 and 11	EduQual may wish to include a position statement regarding the status of the COVID-19 adaptation used for <i>the Award in Access to Operating Theatres (SCQF level 8), R556 04</i> , in the next relevant accreditation submission.
4. Principle 15 and RPDIR - 3	EduQual may wish to check the accuracy of credit rating body statements on certificates for all SQA accredited qualifications. The awarding body may also wish to review the number of certificates that may have been issued with incorrect credit rating body information and consider a strategy for providing amended certificates, should learners request it.
5. Principle 15	EduQual may wish to provide SQA Accreditation with an exemplar for its suite of non-surgical aesthetic cosmetic qualifications.
6. Principle 16	EduQual may wish to undertake a wide-ranging review of how it communicates its regulated awarding body status internationally, particularly relative to non-regulated provision, as a means of mitigating any possible reputational damage that could arise from such misdirected enquiries and complaints to SQA Accreditation.

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 EduQual'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 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.

EduQual currently delivers the SQA accredited *Award in Accessing Operating Theatres* (SCQF level 8), R556 04, via a single approved centre.

Undertaking a review of the centre's website, the audit team found it difficult to locate clear information on the qualification in question. There appeared to be no use of the accredited title, SCQF credit and levelling, or the qualification code granted as part of the accreditation.

SQA Accreditation's provider monitoring report, dated 23 May 2019, noted a similar issue in respect of the centre's *Qualification Prospectus*. This issue was subsequently closed out by EduQual through appropriate amendments to the document, as well as providing links to the pages where appropriate changes had been made to the centre's website.

However, a review of the awarding body's *Centre Communication Log (CCL)* noted that there appear to have been a number of exchanges between the awarding body and the centre during the period 28 March and 3 May 2022 regarding the content of the website. This included discussions around 'correct qualification descriptions' and the 'titling requirements for qualifications.' The audit team is concerned that this has resulted in the loss of specific information in respect of the SQA accredited version of the qualification. Therefore, EduQual must ensure that approved centres accurately reflect qualification details, including the title, SCQF status and level, and code, as determined by the ACG when promoting SQA accredited provision.

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

2.2 Recommendations

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.

A review of EduQual's website noted that the awarding body provides a location containing key policies for centres. This includes policies covering complaints, appeals, confidentiality and privacy, equality and reasonable adjustments, sanctions, malpractice and maladministration, among others.

A comparison of these policies against the versions held on the awarding body's SharePoint site noted that, in some cases, the most current version was not available on the website. Examples include the awarding body's *Complaints Policy (Centres)*, Issue 3.0, January 2018, being available on the website despite an updated version, Issue 4.0, August 2021, being present on SharePoint. Likewise, SharePoint contains the *Sanctions Policy*, Issue 6, March 2022, but an earlier version, Issue 5.3, January 2018, was still available on the website. Therefore, EduQual may wish to review policies publicly available on its website to ensure that they are current and consistent with those uploaded to SharePoint.

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

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

EduQual has significantly increased and improved the range of documentation available on SharePoint in terms of both currency and relevancy since the previous audit in 2018.

Although of a consistently high standard, the audit team did note a few instances where policies, procedures and associated documentation still contained references to specific 2014 Regulatory Principles rather than their 2021 counterparts.

Examples include the *QMRG (Quality and Malpractice Review Group) Terms of Reference*, Issue 3.2, May 2020, and the *EduQual Incorrect Results Policy*, Issue 1, January 2023.

Therefore, as part of its normal cycle of policy and document review, EduQual may wish to check that references to specific SQA Accreditation Regulatory Principles are current and accurately reflect those updated in 2021.

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

Regulatory Principle 10. The awarding body must ensure that its systems and processes for the identification, design, development, implementation and review of qualifications and assessments are fit for purpose.

And

Regulatory Principle 11. The awarding body must ensure that its qualifications portfolio is effectively managed, maintained and reviewed.

A pre-audit review of EduQual's current portfolio of accredited qualifications noted that the *Award in Accessing Operating Theatres (SCQF level 8), R556 04*, is due to reach its accreditation end date on 31 March 2023.

Discussions with various parties in SQA Accreditation indicated that no accreditation submission had been received from EduQual by the date of the audit, although both the Accreditation Manager and Regulation Manager had been involved in previous correspondence and discussions with the awarding body that indicated a clear intention to re-accredit the qualification.

Despite being close to the audit date, the lead auditor chose to alert EduQual of the proximity of the qualification's accreditation end date, as well as seeking an update on plans for the award. The awarding body confirmed that there had been no change of intention regarding the award, but other qualification development work had delayed a submission.

During the discussion, the awarding body noted that the forthcoming submission would include a formalisation of the ongoing adaptation to assessment agreed during the COVID-19 pandemic. However, SQA Accreditation records indicated that 'approval' to use the adaptation expired on 22 June 2022.

Clarification on the situation was sought during the audit, with the audit team noting that the awarding body's most recent *Qualification Validity Argument (QVA)*, dated 22 November 2022, stated the following:

On 1/7/20, due to the impact of COVID-19, SQA-Accreditation formally agreed to a temporary adaptation to the way in which this qualification is delivered and assessed i.e., video evidence of certain skills (e.g., hand-washing) may be used instead of direct observation in an operating theatre environment. This adaptation has now been made permanent.

However, despite the assertion that the adaptation had been extended beyond 22 June 2022, and was now permanent, no evidence to support this position was forthcoming, and the continued use of the adaptation can be seen as an oversight on the part of the awarding body.

The adaptation was subject to thorough quality assurance via provider monitoring activity in 2021, including subsequent reviews of recorded assessments, and meetings with EduQual representatives to ensure a full understanding of how the adaptation was being implemented.

This, allied to the evidence of robust and enhanced ongoing quality assurance by EduQual during 2022 (the qualification is classed as high risk due its health and public safety context) meant that the audit team has no great concerns around the ongoing use of the adaptation.

Nonetheless, EduQual may wish to include a position statement regarding the status of the COVID-19 adaptation used for the *Award in Access to Operating Theatres (SCQF level 8), R556 04*, in the relevant forthcoming accreditation submission.

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

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

In respect of commemorative certificates or transcripts, *Regulatory Principles Directive RPDIR — 3, Logos and certificate requirements for SQA accredited qualifications, v10, January 2020*, notes the following:

Where the qualification has been credit rated, a statement must also be included to acknowledge the Credit Rating Body.

As part of the audit, a general review of certificates issued, as well as website and SharePoint exemplars, noted that the certificates for the *Award in Accessing Operating Theatres (SCQF level 8), R556 04*, contained differences in the statement identifying the credit rating body.

The website and SharePoint exemplars identify SQA Awarding Body as the credit rating body, with recently issued certificates noting SQA Accreditation as the relevant body.

Discussions around the nature of such statements highlighted some confusion on the part of awarding body representatives. The audit team agreed to seek clarification on the relevant statements to be used on certificates from all relevant parties in SQA, with confirmation of an appropriate way forward being sent to the awarding body on 28 February 2023.

In the case of the *Award in Accessing Operating Theatres (SCQF level 8), R556 04*, this confirmed that the relevant certificates should not contain a reference to SQA Accreditation as the credit rating body. Instead, relevant certificates should contain a reference to SQA only.

All other references to the SCQF credit and level of the qualification have been shown to be correct on issued certificates. Likewise, all promotional material issued by EduQual in respect of the qualification, including the website, contains accurate information in this respect. Therefore, the audit team does not consider the inconsistencies in the statements regarding the credit rating body to undermine the validity of certificates issued thus far.

However, going forward, EduQual may wish to check the accuracy of such statements, identifying the correct credit rating body for all SQA accredited qualifications.

The awarding body may also wish to review the number of certificates that may have been issued with incorrect credit rating body information and consider a strategy for providing amended certificates, should learners request one.

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

The review of EduQual certificates and exemplars in respect of credit rating body statements highlighted the fact that no evidence was available for the awarding body's accredited suite of non-surgical aesthetic cosmetic qualifications. The audit team are conscious of the fact that no current learner activity is the primary reason for the lack of available certificates.

However, EduQual may wish to provide SQA Accreditation with an exemplar for its suite of non-surgical aesthetic cosmetic qualifications and upload to SharePoint accordingly.

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

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

Since granting EduQual approved awarding body status in 2018, SQA Accreditation has been subject to a number of misdirected enquiries and complaints in respect of its non-regulated qualifications.

As a matter of course, SQA Accreditation has reviewed every notification, found no requirement for action, and has responded to the individuals or organisations accordingly.

In the opinion of the qualification regulator, all such enquiries and/or complaints thus far have been based upon a misapprehension on the part of the individual or organisation raising the matter.

EduQual has been made aware of all such enquiries and complaints, taking a proactive approach to ensuring that perceived incorrect information is reviewed to ensure accuracy correct, that providers are not misrepresenting awarding body provision as regulated, and directly contacting individual complainants to offer further, guidance and support were necessary.

As part of the audit discussions, EduQual representatives highlighted a number of potential strategies that they are considering as a means of increasing stakeholders' understanding of the awarding body's regulated status.

With this in mind, EduQual may wish to undertake a wide-ranging review of how it communicates its regulated awarding body status internationally, particularly relative to non-regulated provision, as a means of mitigating any possible reputational damage that could arise from such misdirected enquiries and complaints to SQA Accreditation.

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

3 Acceptance of Audit Findings

