



Audit Report

First Aid Awards Ltd

17 August 2017

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1 Background

This was the fourth audit of First Aid Awards Ltd (FAA) since it was approved as an awarding body by SQA Accreditation on 29 September 2010.

FAA is a nationally recognised awarding body with approved centres operating throughout the United Kingdom. FAA has been accredited to offer a range of first aid related qualifications, including Emergency First Aid at Work (EFAW), First Aid at Work (FAW) and Paediatric First Aid. FAA's headquarters are situated in St. Austell, Cornwall.

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 full audit of FAA, 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 FAA 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 FAA'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

FAA: audit date:	17 August 2017
Audit Report approved by Accreditation Co-ordination Group on:	20 September 2017
Audit Report to be signed by FAA:	2 November 2017
Action Plan to be e-mailed to regulation@sqa.org.uk by FAA:	2 November 2017

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 FAA 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, three Issues have been recorded and six Recommendations have been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principle 1	A declaration of interest had been recorded on the awarding body <i>Conflict of Interest Register</i> against an individual. However, it was later identified that the same individual's conflict of interest declaration form had been signed with no interests declared.	Low
2. Principle 10	There are no documented criteria to use internally in order to assign an appropriate risk rating to a provider, depending on their compliance activities.	Low
3. Principle 10	Standardisation activities could not be verified as no formal scheduling or recording currently takes place.	Low

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. Principle 1	The Accreditation Auditors recommend that mitigating actions be fully referenced within the <i>Conflict of Interest Register</i> and, where appropriate, that identifiers for the various Regulators are provided.
2. Principle 4	The Accreditation Auditors recommend the inclusion of review dates within the awarding body risk register, in order to demonstrate ongoing review.
3. Principle 6	It is recommended that the awarding body amends its <i>Incident Register</i> to include identifiers to distinguish between the different Regulators.
4. Principle 9	It is recommended that the awarding body amends its qualification review policy to reflect the ongoing reviews that take place within the five-year accreditation period.
5. Principle 10	It is recommended that the awarding body clarifies internally what actions it considers to be issues and those that are only recommendations. Thereafter, it should adhere to that terminology to ensure that desktop quality assurance reports are as clear as possible.
6. Principle 15	It is recommended that the awarding body considers implementing an e-certification policy to provide strict guidance on how and under what circumstances e-certificates should be printed, as well as monitored and controlled, when providers use this method of certification.

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 FAA'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 1. The awarding body shall have clearly defined and effective governance arrangements.

The Accreditation Auditors reviewed evidence pertaining to awarding body conflict of interest procedures which consisted of a *Conflict of Interest Register* and signed declarations by key personnel. Upon review of the register the Accreditation Auditor noticed an anomaly in that the head of an FAA provider, who also carried out contracted external quality assurance work for FAA, was not on this register. When looking further into the matter, it was discovered that the conflict of interest declaration form had been signed but no declarations had been made, which clearly was not the case. The Accreditation Auditors do not consider this to have been a deliberate deception, rather a lack of oversight on the matter by awarding body personnel.

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

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 awarding body online system FAAPlus was interrogated by the Accreditation Auditors and it was identified that the awarding body risk-rates its providers. However, there are no documented criteria to use internally in order to assign an appropriate risk rating to a provider, depending on its compliance activities.

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

The awarding body has a limited number of external quality assurance personnel, who are based remotely from each other and the awarding body. So, in the majority of cases, standardisation activities are carried out remotely, such as by teleconferencing/Skype. However, these activities could not be verified as no formal scheduling or recording currently takes place.

This has been recorded as **Issue 3**.

2.2 Recommendations

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

The Accreditation Auditors reviewed the Awarding Body *Conflict of Interest Register*, and sampled a second External Quality Assurer (EQA) entry (different from the one identified under Issue 1 above). Under the column 'mitigating actions', the phrase "signed declaration" was noted but there was no description as to how the awarding body was mitigating the impact of this EQA being a "Centre Head" other than stating this as a conflict of interest. Therefore, the Accreditation Auditors would recommend that mitigating actions be fully referenced within the *Conflict of Interest Register*.

Additionally, the *Conflict of Interest Register* referenced, in places, particular providers that had a conflict of interest. However, these were not distinguishable by Regulator and therefore it was difficult for SQA Accreditation's Auditors to ascertain appropriateness.

It is recommended that the Awarding Body be thorough in the details it records in the *Conflict of Interest Register* and, where appropriate, provide identifiers for the various Regulators.

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

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

The risk register, *Internal Risks Identified (FAA & FAA Approved Centres)*, was presented to the Accreditation Auditors for review. All information was current and satisfactory. However, the Accreditation Auditors would recommend the inclusion of review dates, in order to demonstrate ongoing review.

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

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

The Accreditation Auditors reviewed the awarding body's *Incident Register*. The register did not distinguish between the different regulated provision in relation to incidents that had occurred. This made it difficult to determine if the incidents that had arisen related to SQA accredited qualifications. Therefore, it is recommended that the awarding body amend its log to include suitable identifiers to distinguish between the different Regulators.

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

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.

The awarding body sets, as standard, a five-year review period for all qualifications to coincide with accreditation periods. The Accreditation Auditors discussed the reasons why a five-year period may in fact be too long, particularly given that SQA Accreditation has a two-year zero uptake policy that awarding bodies have to give due consideration to. This should necessitate a review prior to the two-year policy taking effect if no learners are registered on a qualification. The awarding body understood this and evidenced that it actually carries out such a review. It highlighted a particular qualification to the Accreditation Auditors which had just been reviewed and a determination made after 18 months that it is unlikely to have any learners registered on it. Consequently, the awarding body will be contacting SQA Accreditation to withdraw the qualification. Thus evidencing that the awarding body, although not formally conducting a review as such, still maintains consistent overview of the qualifications, responding to stakeholders and EQA feedback as well as uptake numbers. Therefore, it is recommended that the awarding body amend its qualification review policy to reflect the ongoing reviews that take place within the five-year accreditation period.

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

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 Accreditation Auditors reviewed the desktop quality assurance reports produced internally for providers. The report highlighted what appeared to be an action for the provider to take but the conclusion of the report didn't mention this. The awarding body representative explained that the action recorded wasn't technically an action, but only a note for the provider to be aware of, for the length of the qualification delivery. The rationale was understood by the Accreditation Auditors, however on first sight the report is confusing and contradictory. Therefore, it is recommended that the awarding body clarify internally what actions it considers to be issues and those that are only recommendations. Thereafter, it should adhere to that terminology to ensure that desktop quality assurance reports are as clear as possible.

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

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

The Accreditation Auditors reviewed the security of the e-certificates that the awarding body allows providers to print. The e-certificates do include Quick Response (QR) codes and unique certificate numbers. However, other than this there are no further security measures provided for e-certification. Therefore, it is recommended that the awarding body considers implementing an e-certification policy to provide strict guidance on how, and under what circumstances, e-certificates should be printed, as well as monitored and controlled when providers use this method of certification.

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

3 Acceptance of Audit Findings

For and on behalf of First Aid Awards Ltd:

For and on behalf of SQA Accreditation:

Print name

Print name

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Signature

Signature

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Designation

Designation

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Date

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