



# **Audit Report**

**Highfield Qualifications**

**2 August 2017**

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# 1 Background

This was the third audit of Highfield Qualifications since it was approved as an awarding body by SQA Accreditation in 2010.

Highfield Qualifications is a nationally-recognised awarding body that offers a range of compliance and work-based learning programmes and qualifications in a range of areas including health and safety, security, first aid, teaching and licensing.

Highfield Qualifications has its headquarters in Doncaster.

## 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 audit of Highfield Qualifications based upon, but not limited to, the areas identified within SQA Accreditation's awarding body audit and provider monitoring strategic plan for 2017–18. This included aspects of the awarding body's operational activities in respect of Regulatory Principles 1, 8, 11, 14 and 15.

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 Highfield Qualifications 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 Highfield Qualifications' 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

Highfield Qualifications: audit date:	2 August 2017
Audit Report approved by Accreditation Co-ordination Group on:	30 August 2017
Audit Report to be signed by Highfield Qualifications:	12 October 2017
Action Plan to be e-mailed to <a href="mailto:regulation@sqa.org.uk">regulation@sqa.org.uk</a> by Highfield Qualifications:	12 October 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](mailto: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 Highfield Qualifications 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 four Recommendations have been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principles 10 and 11	Highfield Qualifications' <i>Recognition of Prior Learning Policy, 3 May 2017, Version 2</i> , requires a clearer and more positive approach to supporting RPL and Recognition of Prior Achievement (RPA). For RPA more detailed information on the awarding body's position on RPA must be referenced appropriately within the relevant qualification specifications.	Low
2. Principles 13	Highfield Qualifications must revise its current appeals and complaints procedures to ensure that the roles of both SQA Accreditation and the Scottish Public Sector Ombudsman (SPSO) are fully and clearly outlined.	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 5	Highfield Qualifications may wish to ensure that the information contained within Appendix 1 of the <i>Centre Agreement, 11 January 2017, Version 5</i> , is updated to make sure that the most current and complete version of SQA Accreditations Regulatory Principles are available to stakeholders.
2. Principle 10	With the Security Industry Authority (SIA) scheduled to conduct a review of the Security qualifications in April 2018, we recommend that Highfield Qualifications makes the SIA aware of the discussions that have taken place with SQA Accreditation over the definition of what constitutes effective multiple-choice questions. In particular, how such a method of assessment is constructed in terms of using a stem question, the number of answer options, and the use of distractors, relative to the assessment guidance provided by the SIA.
3. Principle 11	Highfield Qualifications may wish to review the nature and purpose of any post-assessment adjustment to marks in the context of Special Considerations, as well as further thought around the appropriateness of any references within the relevant policy, to ensure that it provides stakeholders with clear and concise guidance.
4. Principle 15 and RPDIR - 3	<p>Highfield Qualifications may wish to ensure that it is compliant with SQA Accreditation's revised regulatory requirements in respect of RPDIR - 3.</p> <p>It may also wish to give thought to how it will address the matter of certificates that have been issued to learners since October 2016 that do not meet the current regulatory requirements, and ensure that a remedial plan of action is available and shared with SQA Accreditation.</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 Highfield Qualifications' 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 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 11. The awarding body shall ensure that its qualifications and their assessment are inclusive and accessible to learners.**

A review of the awarding *body's Recognition of Prior Learning Policy, 3 May 2017, Version 2*, highlighted the fact that the document lacks clarity around the information provided in respect of Recognised Prior Achievement (RPA).

Despite providing a suitable definition of RPA within the policy, the awarding body noted that it 'does not normally reduce or change the assessment requirements of Highfield qualifications on the grounds of the learners possessing prior learning or prior achievement'.

The audit team found the overall tenor of the policy to be discouraging in respect of fully supporting requests for RPL and RPA. This seemed somewhat counter-productive in the respect of RPA, given the fact that a number of SQA-approved qualifications currently offered by Highfield Qualifications have shared units.

However, during discussions on the day of the audit, it was stated that the awarding body will indeed recognise prior unit achievement subject to the currency of the unit in question, and appropriate evidence of achievement being provided.

Awarding body representatives believed that this approach reflected the policy that exceptions could apply in respect of both RPL and RPA. The policy directs centres and learners to the published qualification specification for further guidance. However, a review of the qualification specifications does not provide any significant guidance specific to the relevant qualification, but simply refers the stakeholder back to the policy.

Whilst accepting that Highfield Qualifications' SQA provision incorporate a high percentage of on-demand assessment within short-duration courses, which makes recognition of prior learning potentially bureaucratic and time-consuming relative to the course itself, the audit team considers that the policy requires a clearer and more positive approach to supporting RPL and RPA. There must be more detailed information on the awarding body's position on RPA, and it must be referenced appropriately within the relevant qualification specifications.

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

**Regulatory Principle 12. The awarding body and its providers shall have open and transparent systems to manage complaints.**

**Regulatory Principle 13. The awarding body and its providers shall have clear, fair and equitable procedures to manage appeals.**

And

**Regulatory Principle Directive RPDIR – 5 Complaints handling**

A review of the awarding body's *Appeals Procedure, 28 March 2017, Version 5*, and the *Complaints Procedure, 28 March 2017, Version 5*, highlighted a number of areas that require clarification in respect of the remit of both SQA Accreditation and the Scottish Public Sector Ombudsman (SPSO).

Firstly, within both documents, references to an appellant/complainant being entitled to raise the matter with the relevant Qualification Regulator needs to be qualified in respect of SQA Accreditation. Clarity must be provided around the nature of any referral being considered as a complaint, as well as clarifying the Qualification Regulator's position in respect of overturning assessment decisions or academic judgements made by Highfield Qualifications.

Secondly, within the appeals procedure, further clarification must be brought to the section on the role of the SPSO. Whilst this is accurate in respect of any referral constituting a complaint, it must detail: timescales for referral; which learners can make a referral; as well as the SPSO's position in respect of academic decisions made by the awarding body.

Lastly, in respect of the complaints procedure, appropriate references to the SPSO and its role in any complaints regarding SQA accredited provision must be added to the document,

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

## 2.2 Recommendations

**Regulatory Principle 5. The awarding body shall provide clear information on its procedures, products and services and ensure that they are accurate and appropriate to SQA accredited qualifications.**

A review of Highfield Qualifications' *Centre Agreement, 11 January 2017, Version 5*, noted that SQA Accreditation's Regulatory Principles had been provided as Appendix 1 to the document.

Whilst considering this to be good practice which provides clarity for centre personnel, the audit team noted that for a number of the Regulatory Principles the associated supplementary information was not provided in full.

The awarding body may wish to ensure that the information in Appendix 1 is updated to make sure that the most current and complete version are available to stakeholders.

This has been noted as **Recommendation 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.**

With the Security Industry Authority (SIA) scheduled to conduct a review of the Security qualifications in April 2018, we recommend that Highfield Qualifications makes the SIA aware of the discussions that have taken place with SQA Accreditation over the definition of what constitutes effective multiple-choice questions. In particular, they should discuss how such a method of assessment is constructed in terms of using a stem question, the number of answer options, and the use of distractors, in the light of the assessment guidance provided by the SIA.

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

**Regulatory Principle 11. The awarding body shall ensure that its qualifications and their assessment are inclusive and accessible to learners.**

A review of the awarding body's *Special Considerations Policy, 7 March 2016, Version 3*, noted that in certain circumstances, Special Consideration 'may result in a post-assessment adjustment being made to the mark of the learner in question'.

The policy noted that the relevant circumstances may include learners being disadvantaged by illness, injury or missing part of the assessment due to circumstances beyond their control, and clarification was then sought from the awarding body representatives on the nature of such adjustments and how they might be implemented. However, there appeared to be no collective agreement on what such an adjustment may constitute and indeed, whether or not such a change would occur, irrespective of the circumstances.

Therefore, the awarding body may wish to review the nature and purpose of any post-assessment adjustment to marks in the context of Special Considerations, as well as further thought around the appropriateness of any references within the relevant policy, to ensure that it provides stakeholders with clear and concise guidance.

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

**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 – 3, Logos and certificate requirements for SQA Accredited Qualifications**

SQA Accreditation is conscious that a review of the awarding body's certificate designs will take place as part of the ongoing transition plan connected with the recent rebranding exercise. This will take place once existing certificate stocks have been exhausted.

As part of this process, and in light of the revisions made to RPDIR – 3 regarding updated certificates requirements (communicated through the SQA Accreditation Newsletter of October 2016 and reiterated in June 2017), Highfield Qualifications may also wish to ensure that they are compliant with SQA Accreditation revised regulatory requirements.

It may also wish to give thought to how it will address the matter of certificates that have been issued to learners since October 2016 that do not meet the current regulatory requirements and ensure that a remedial plan of action is available and shared with SQA Accreditation.

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

### 3 Acceptance of Audit Findings

For and on behalf of Highfield  
Qualifications:

For and on behalf of SQA Accreditation:

**Print name**  
JASON SPRENGER

**Print name**

**Signature**



**Signature**

**Designation**  
CHIEF EXECUTIVE OFFICER

**Designation**

**Date**  
11 OCTOBER 2017

**Date**