



Audit Report

Highfield Qualifications

28 February 2024

Contents

1 Background	1
1.1 Scope	1
1.2 Audit Report and Action Plan Timescales	2
1.3 Summary of Audit Issues and Recommendations	3
1.4 Risk Rating of Issues	5
2 Detail of Audit Issues and Recommendations	6
2.1 Issues	6
2.2 Recommendations	6
3 Acceptance of Audit Findings	9

1 Background

This was the fifth 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.

As this was a remote audit of Highfield Qualifications, 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 Highfield qualifications 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 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: 28 February 2024

Audit Report approved by
Accreditation Co-ordination Group on: 21 March 2024

Audit Report to be signed by Highfield Qualifications: 7 May 2024

Action Plan to be emailed
to regulation@sqa.org.uk by Highfield qualifications: 7 May 2024

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 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, no Issues have been recorded and five Recommendations have been noted.

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 1	The awarding body may wish to amend the <i>Highfield Corporate Governance Manual</i> to reflect the option for reporting incidents as noted in SQA Accreditation's <i>Regulatory Principles Guidance Note – Principles 1 and 7, Reporting Incidents to SQA Accreditation, Version 2 (October 2022)</i> .
2. Principles 5 and 17	Highfield Qualifications may wish to consider revising its position on appeals around the rejection of centre approval applications, ensuring that it is robust and transparent from a customer service standpoint, mitigating the potential for complaints being raised with SQA Accreditation.
3. Principle 15	Given provider perceptions that Highfield Qualifications no longer provides hard copy certificates as a matter of course, with learners having to request such certificates at additional cost, the awarding body may wish to consider including a position statement in relevant guidance clarifying the approach for stakeholders.
4. Principle 16	In respect of the <i>Complaints Procedure</i> , Highfield Qualifications may wish to consider reviewing and amending the identified job roles noted in the document to ensure that they are current and accurate.
5. Principle 18	Highfield Qualifications may wish to review its <i>Malpractice and Maladministration Policy</i> to ensure that identified examples of both match the relevant definitions provided.

	<p>Also, the awarding body may wish to consider if the current wording in the policy adequately accounts for the requirement to report suspected cases of malpractice and/or maladministration to SQA Accreditation when identified.</p>
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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

No issues were recorded during this audit.

2.2 Recommendations

Regulatory Principle 1. The awarding body must have an accountable officer and demonstrate that it has clearly defined and effective governance arrangements.

A review of the *Highfield Corporate Governance Manual*, Clause 9.12, noted a single email address for reporting incidents to SQA Accreditation.

Although the email address is correct, the qualification regulator does not expect it to be the sole method for reporting incidents. SQA Accreditation's *Regulatory Principles Guidance Note – Principles 1 and 7, Reporting Incidents to SQA Accreditation, Version 2 (October 2022)* notes that contacting the relevant Regulation Manager for 'clarification on what you should report or how to report It' is an appropriate course of action.

Therefore, the awarding body may wish to consider amending the *Highfield Corporate Governance Manual* to reflect this option.

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

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.

And

Regulatory Principle 17. The awarding body and its providers must have clear, fair, and equitable systems, policies, and procedures to manage appeals.

Both the Highfield Qualifications *Customer Service Statement 2023, Version 5*, and *Enquiries and Appeals Procedure* note that there is no right of appeal against a decision by the awarding body to refuse centre approval.

More specifically, the *Customer Service Statement 2023, Version 5*, states that it is 'important to note that Highfield reserve the right to decline any application it receives at its absolute discretion'.

This is expanded upon in a footnote to guidance on how to become an approved Highfield centre on the awarding body's website which states:

Highfield's application process is confidential, and no feedback will be provided on the specific checks undertaken as part of this quality assurance process, or the reason to decline an application.

The *Enquiries and Appeals Procedure* chooses to outline the areas that the procedure does not cover as follows:

Prospective Centres (including staff)/Training Providers/Employers/ who had their application to become approved by Highfield, declined.

However, the audit team would contend that all of the above is at odds with the opening statement in the *Enquiries and Appeals Procedure* which states that 'the procedure is designed for a party who wishes to challenge the outcome of a decision made by Highfield Qualifications.'

The *Highfield Quality Assurance Strategy* details the range and nature of the checks that the awarding body may choose to undertake in respect of an applicant for centre approval, and these were discussed with awarding body representatives. It was noted that such checks did not simply relate to an organisation's ability to carry out key awarding functions but included a review of available intelligence on the suitability of key personnel. It is this latter aspect that the awarding body is unwilling to divulge as part of any appeal, as experience has shown that it results in staff at all levels becoming embroiled in a range of negative communications with rejected applicants.

The audit team fully appreciate the sensitive nature of some of the checks conducted on applicants, the difficulties that can arise for staff if challenged around a decision to reject an application but believes that there is still an opportunity to allow appeals in respect of key awarding functions that form part of the application process, given that there is a fee required.

Therefore, Highfield Qualifications may wish to consider revising its position on appeals around the rejection of centre approval applications, ensuring that it is robust and transparent from a customer service standpoint, mitigating the potential for complaints being raised with SQA Accreditation.

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.

Recent provider monitoring activity indicated a perception amongst the providers sampled that Highfield Qualifications no longer provides hard copy certificates as a matter of course, with learners having to request such certificates at additional cost.

While the audit team was able to see sufficient guidance for providers on how to register and certificate learners and is aware that e-certification is regularly used by the awarding body, it was difficult to determine from the range of documentation if the understanding of providers is an accurate representation of the approach taken by Highfield Qualifications.

Therefore, the awarding body may wish to consider including a position statement in relevant guidance clarifying the approach for stakeholders.

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

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

A review of the Highfield Qualifications *Complaints Procedure* noted, in the section on how to complain, a range of possible contacts defined by job role. The audit team found it difficult to establish the relationship between the job roles and their particular function relative to making a complaint.

In seeking clarification of the above, awarding body representatives noted that some of the identified job roles were no longer current and that this area of the *Complaints Procedure* required to be updated.

Therefore, Highfield Qualifications may wish to consider reviewing and amending the identified job roles in the *Complaints Procedure* to ensure that they are current and accurate.

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

Regulatory Principle 18. The awarding body and its providers must ensure that it has safeguards to prevent and manage cases of malpractice and maladministration.

Highfield Qualifications *Malpractice and Maladministration Policy* notes the following as an example of maladministration:

Withholding of information, by deliberate act or omission, from Highfield which is required to assure Highfield of the centre's ability to deliver qualifications appropriately.

Given the reference to a deliberate act, the awarding body may wish to consider if it is more appropriate to define this as an example of malpractice.

The *Malpractice and Maladministration Policy* also contains the following wording:

Where applicable and in accordance with regulatory requirements, a member of our Centre Support and Compliance Team will inform the appropriate regulatory authorities if we believe there has been an incident of malpractice or maladministration, which could either invalidate the award of a qualification, or if it could affect another awarding organisation. In particular, we will keep them informed of progress in large and/or complex cases.

The audit team consider this to solely relate to identified incidents of malpractice or maladministration and may not account for the requirement to report suspected instances of malpractice and/or maladministration to SQA Accreditation.

Therefore, the awarding body may wish to consider if the current wording adequately accounts for the requirement to report suspected cases of malpractice and/or maladministration when identified.

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

3 Acceptance of Audit Findings