

Audit Report

IMI

12 July 2018

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	7
3 Acceptance of Audit Findings	9

1 Background

This was the 16th audit of IMI since it was approved as an awarding body by SQA Accreditation in 1995.

As a nationally-recognised awarding body, IMI provides a range of competence-based qualifications, including Scottish Vocational Qualifications (SVQs), Vocational Competence Qualifications (VCQs) and Vocationally Related Qualifications (VRQs) in support of the automotive industry. The awarding body has also been accredited to deliver Workplace Core Skills Units.

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 IMI, 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 IMI 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 IMI'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

IMI audit date:	12 July 2018
Audit Report approved by Accreditation Co-ordination Group on:	15 August 2018
Audit Report to be signed by IMI:	27 September 2018
Action Plan to be e-mailed to regulation@sqa.org.uk by IMI:	27 September 2018

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 IMI 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. Principle 1	Conflict of interest declarations have not been refreshed or revisited since initial employment.	Low
2. Principle 15	The data captured by the awarding body for both registration and certification did not include contact details for candidates, such as e-mail or home address. Instead, it is the provider where the candidate undertakes their qualification who captures this detail.	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. Principle 2, 3	The Accreditation Auditor strongly recommends that the awarding body considers providing detailed objectives which can explicitly demonstrate management commitment to the Scottish learner and SQA Accreditation.
2. Principle 4	It is recommended that, in order to provide full, clear and pertinent information to SQA Accreditation, awarding body spreadsheets and other appropriate systems be reviewed and potentially amended to provide the ability to filter for those providers delivering SQA Accredited qualifications.
3. Principle 4	It is recommended that the awarding body includes in its risk register any significant potential risk posed by third party providers of major services.
4. Principle 12	It is recommended that the awarding body includes full details in its enquiry/complaints log to explain why response times were not met on occasion.
5. Principle 13	It is recommend that the wording under the paragraph entitled "Taking an Appeal Further" in the Appeals Policy, be clarified, as SQA Accreditation does not have a formal procedure to handle appeals as the policy suggests.

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 IMI'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 discussed with awarding body representatives the current process for capturing conflicts of interest on the part of external quality assurance (EQA) staff. It was understood that at the time of initial employment EQAs signed a declaration of interests form confirming they understood awarding body policy on conflicts of interest, and raised any conflicts existing at that time. However, this matter has not been revisited since initial employment.

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

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 awarding body's process for registering and certifying candidates. It was established that the data captured for both processes did not include contact details for candidates, such as e-mail or home address. Instead, it is the provider with whom the candidate undertakes their qualification which captures these details. This has the potential to cause issues if incorrect certificates have been issued and a recall might be required further down the line. By not capturing such data, the registration system is not considered robust, as the awarding body will have to rely on providers passing on candidates' contact details to it. Furthermore, situations could arise where candidates could be disadvantaged. The provider with whom a candidate was registered might cease to be an approved provider with IMI, and in light of the new data protection act the provider might be unwilling to share the candidate's contact details with the awarding body. Indeed if a provider were to cease operations entirely, candidates' contact data could be lost. In both scenarios candidates would be uncontactable and potentially disadvantaged.

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

2.2 Recommendations

Regulatory Principle 2. The awarding body shall ensure it has the necessary resources to effectively carry out its operational functions to meet regulatory requirements.

Regulatory Principle 3. The awarding body shall have clearly defined business planning processes which show evidence of management commitment, decision making and ongoing review.

The awarding body's Strategic Plan 2017-2020 was reviewed and it was noted in discussion with awarding body representatives that there was no reference to maintaining or growing qualifications in Scotland, or commitment to the Scottish learner or SQA Accreditation. The discussion highlighted that there was no mention of any regulator or reference to growing qualifications generally, due to the high-level nature of the plan. It was debated whether commitment to SQA Accreditation and the Scottish learner was demonstrated by the operational objective plan, which includes an objective to "*maintain compliance with SQA*". It could be argued that this commitment to SQA Accreditation implies a commitment to the Scottish learner. The Accreditation Auditor strongly recommends that the awarding body consider providing detailed objectives which explicitly demonstrate management commitment to the Scottish learner.

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 Accreditation Auditor asked the awarding body to demonstrate how it would identify any high-risk providers delivering SQA Accredited provision. The awarding body representative, following its usual process, evidenced this through use of a spreadsheet "Centre risk rating". The spreadsheet was filtered by EQA, which left three providers, but the relevant awarding body representative knew from experience that the centres shown as high risk were not delivering SQA Accredited qualifications. From the external auditor's point of view, there was a gap in following through this process to identify relevant information pertaining to SQA Accredited qualifications. Therefore, it is recommended that in order to provide full, clear and pertinent information to SQA Accreditation, the spreadsheet be amended to provide the ability to filter for those providers delivering SQA Accredited qualifications. The awarding body may wish to review its other systems, such as centres hub, in light of this recommendation.

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

The awarding body's live risk register was reviewed and there appeared to be no mention of the potential risk posed by third party providers of major services such as certification, if they were unable to maintain that service. It is prudent to list actual and potential risks, and therefore it is recommended that the awarding body include in their risk register any such risk posed by third party providers of major services.

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

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

The Accreditation Auditors reviewed the recording and monitoring of complaints to the awarding body. Most information was captured and regularly reviewed by the awarding body. However, there was one occasion in which the timeframe for responding to a complainant was not met. The Accreditation Auditors had no issue with the rationale as to why the timeframe was not met, but there was no written explanation of this. Therefore, it is recommended that the awarding body include full details in their enquiry/complaints log to explain why response times were not met on occasion.

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

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

The Accreditation Auditors reviewed the awarding body's Appeals Policy and recommend the wording under the paragraph entitled "Taking an Appeal Further" be clarified, as SQA Accreditation does not have a formal procedure to handle appeals as the policy suggests. It would be prudent to amend the wording to explain that if a candidate is unhappy with an appeal outcome, they can bring it forward by way of a complaint to SQA Accreditation.

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

3 Acceptance of Audit Findings

For and on behalf of IMI:

For and on behalf of SQA Accreditation:

Print name

Print name

.....

LAURA WALKERDINE

.....

Signature

Signature

.....

.....

Designation

Designation

.....

Senior Regulation Manager

.....

Date

Date

.....

16 August 2018

.....