Audit Report

ITC First

18 October 2018

Contents

1 Background

This was the fourth audit of ITC First since it was approved as an awarding body by SQA Accreditation in July 2009.

ITC First is a nationally-recognised awarding organisation offering a range of environment-specific, tailored first aid qualifications, as well as a range of health and safety qualifications — which includes fire safety training, manual handling, and general health and safety awareness training — to industry.

ITC First's headquarters are in Hartlepool.

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 ITC First based upon — but not limited to — the areas identified in SQA Accreditation's awarding body audit and provider monitoring strategic plan for 2018–19. The audit included aspects of the awarding body's operational activities in respect of Regulatory Principles 1, 8, 11, 14 and 15.

In addition to this, aspects of the awarding body's systems and procedures for the review and maintenance of SQA accredited qualifications (covered by Regulatory Principles 9 and 10) were included in 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 ITC First 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 ITC First'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

ITC First: audit date: 18 October 2018

Audit Report approved by
Accreditation Co-ordination Group on: 14 November 2018

Audit Report to be signed by ITC First: 8 January 2019

Action Plan to be e-mailed
to regulation@sqa.org.uk by ITC First: 8 January 2019

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 ITC First 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, four Issues have been recorded and five Recommendations have been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principle 1	The appendix to the awarding body document *CG1 Corporate Governance, April 2017*, does not appear to address SQA Accreditation's regulatory requirements as referenced in the supplementary information for Regulatory Principle 1 and SQA Accreditation's guidance on reporting incidents given in *Regulatory Principles Guidance Note – principles 1 and 7, Reporting Incidents to SQA Accreditation, 1 June 2017*.	Low
2. Principles 5 and 9	As SQA accredited qualifications are placed within the SCQF, the way in which the 'size' and potential time necessary to complete a qualification is noted should reference the appropriate terminology as specified in current SCQF guidance.	Low
3. Principle 9	ITC First must retain a degree of responsibility for the management of knowledge and understanding of the literacy and numeracy requirements for its accredited provision, as well as ensuring that the function of determining appropriate levels of literacy and numeracy of learners is effectively quality assured by centres to ensure that learners are appropriately supported.	Medium
4. Principle 10	A review of EQA activity for ITC First centres delivering SQA accredited qualifications highlighted that a centre deemed low risk was not visited within the stated 18 month timescale.	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	ITC First may wish to consider how certain job requirements and barriers are best presented within job descriptions to avoid any perceived discrimination.
2. Principle 1	ITC First may wish to revisit the relationship between the Chief Executive Officer and Chief Verifier roles to ensure that the line management relationship is not rendered meaningless, leaving the potential for a conflict of interest to arise.
3. Principles 1 and 8	ITC First may wish to provide a redacted version of any third-party contractual agreements, as well as evidence that the performance of the relevant third-party is subject to regular and consistent review, ensuring that all obligations are met, and that there is no negative impact on the awarding body's compliance with SQA Accreditation's regulatory requirements.
4. Principles 6 and 7	ITC First may wish to review the full range of policies, procedures and guidance documentation to ensure that references to SQA Accreditation, its regulatory requirements and guidance documentation, are current and fit for purpose.
5. Principle 15	SQA Accreditation supports ITC First's proposal to 'pilot' digital certification in respect of SQA accredited provision using a small number of approved centres to ensure that the system is robust, and to gain a greater understanding of the likely impact on centres and the potential benefits to learners. The audit team recommends that a report is provided to SQA Accreditation for consideration before a decision is made to make digital certification more widely available to centres providers approved to deliver SQA qualifications.

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 ITC First'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 awarding body document *CG1 Corporate Governance, April 2017*, provides details of the organisation's operating structure, including senior officers, the terms of reference, and membership for all committees and technical teams, for 2017–18. Broadly speaking, the audit team found this document to be comprehensive and informative in providing an overview of the allocation of resources.

However, the document has an appendix which outlines 'key reminders for the ITC Office' in respect of both Ofqual and Qualification Wales. The reminders include the need to inform the relevant regulator of a change of legal status, insolvency, bankruptcy, or change of responsible officer, as well as to provide a statement of compliance and provided direct notification of submissions for different qualifications. These factors are referenced to specific conditions in Ofqual's *General Conditions of Recognition* where appropriate.

The appendix does not appear to address SQA Accreditation's regulatory requirements in a similar manner. There is no evidence that cognisance has been taken of the supplementary information for Regulatory Principle 1 and SQA Accreditation's guidance on reporting incidents given in *Regulatory Principles Guidance Note – principles 1 and 7, Reporting Incidents to SQA Accreditation, 1 June 2017*.

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

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.

And

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.

A review of awarding body documentation, including the qualification specifications published to support SQA accredited provision, which have been credit rated for the Scottish Credit and Qualifications Framework (SCQF), highlighted the use of Total Qualification Time (TQT) as a means of referencing and determining the time taken to achieve an SQA accredited qualification.

TQT is defined in Ofqual's *General Conditions of Recognition* as 'the number of notional hours which represents an estimate of the total amount of time that could reasonably be

expected to be required in order for a Learner to achieve and demonstrate the achievement of the level of attainment necessary for the award of a qualification'. This is relevant to regulated provision within the Regulated Qualifications Framework (RQF).

The concept of notional hours is also integral to the SCQF credit rating process, being described in SQA Accreditation's *Credit Rating of SQA Accredited Qualifications for the Scottish Credit and Qualifications Framework, Guidance for Sector Skills Councils, Standard Setting Organisations, Awarding Bodies and Participants, April 2014,* as encompassing 'both contact time and self-directed learning undertaken by the learner'.

More importantly, the same SQA Accreditation document cites the following extract of Guideline 3.3 from the *SCQF Handbook: User Guide* (2009) which, under the heading of Notional Learning Hours, says that 'Notional learning hours should include all learning activities required for the achievement of the learning outcomes. It is made up of formal activities that involve teaching and tutor contact time; self-directed activities that involve study, research, applied learning, developing practice, reflection and review; and assessment activities that involve planning and completing assessment tasks.'

Therefore, as SQA accredited qualifications are placed within the SCQF, the way in which the 'size' and potential time necessary to complete a qualification is noted should reference the appropriate terminology as specified in current SCQF guidance.

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

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.

A review of the published qualification specifications produced in support of the current compliment of SQA accredited qualifications carries a statement to the effect that 'prospective candidates are to be advised that they should have literacy and numeracy competency appropriate to the qualification'.

A further statement notes that 'it is the responsibility of the centre to provide guidance and advice to the candidates prior to the commencement of the programme'.

The audit team contends that there is insufficient clarity for centres/providers in both statements to adequately support such a function being carried out consistently and effectively. The initial statement does not provide information on what constitutes the appropriate levels of literacy and numeracy competence, where the standards can be found, or what authority underpins the statement.

The audit team also contends that ITC First must retain a degree of responsibility for this function undertaken by its approved centres and that it has a duty of care to manage knowledge and understanding of the literacy and numeracy requirements for its accredited provision. It also has a duty to ensure that the function of determining appropriate levels of literacy and numeracy of learners is effectively quality assured to ensure that learners are appropriately supported.

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

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.

As well as outlining the role of the External Quality Assurer (EQA), ITC First's *EQA1 External Quality Assurance procedures & Specifications, All Qualifications, January 2017*, provides information on the centre risk rating process and frequency of EQA activity, noting that centres 'are assigned a risk rating by EQAs as part of the EQA reporting process.'

The External Quality Assurers use a scale of range from 1 to 4 for the purposes of risk rating, with centres that pose the greatest risk in terms of compliance with ITC First's 'regulation and compliance' subject to more frequent EQA activity. A risk rating of 1 indicates that the centre is very low risk and has a target visit frequency of 18 months.

A review of EQA activity for ITC First centres delivering SQA accredited qualifications during the audit indicated that the awarding body was largely meeting its published timescales relevant to the risk ratings. However, in one instance, it was noted that a centre deemed low risk was not visited within the stated 18 month timescale.

This has been recorded as **Issue 4**.

2.2 Recommendations

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

On reviewing a number of job descriptions, including those for an Office Assistant (dated January 2014), Office Administrator (January 2017) and Administrator (dated July 2017), the audit team noted the inclusion of a section titled 'Physical Abilities'. This section does not appear to be present in any other ITC First job descriptions sampled by the audit team.

The section in question seems somewhat confused in respect of the information provided, the majority of which would be better placed within other sections of the job description such as 'Specific Responsibilities' or 'Personal Specifications'. For example, references to using a computer, answering phones, archiving documents, as well as lifting/moving parcels would arguably be examples of specific responsibilities.

The section also contains more oblique references to 'physical procedures', with two of the job descriptions specifically noting that there is a requirement for 'the candidate to work in a first-floor office environment'. In the opinion of the audit team, it would appear that such contextual references are the basis for including the section within the range of administrative job descriptions. However, there is a concern that the inclusion of such a section may be perceived to be a discriminating barrier for potential employees.

Following discussions, the audit team is in no doubt that the intention is to be open and transparent regarding the full requirements of the job role, whilst accepting that the nature of the awarding body's headquarters has resulted in restrictions around the potential for adaptations. However, ITC First may wish to consider how certain job requirements and barriers are best presented within the relevant job descriptions to avoid any perceived discrimination.

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

A review of the current job description for ITC First's Chief Verifier, dated January 2017, notes that the job holder 'is directly responsible to the CEO'.

Under specific responsibilities within the job description, it is also noted that the Chief Verifier will undertake 'expertise and CPD training as directed by the Chief Executive Officer' to meet the responsibilities of the role.

However, it was noted by the audit team that the roles of Chief Verifier and the Chief Executive Officer are currently held by the same member of staff.

ITC First may wish to revisit the relationship between both roles to ensure that the line management relationship is not rendered meaningless, leaving the potential for a conflict of interest to arise.

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

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

And

Regulatory Principle 8. The awarding body shall ensure that SQA Accreditation is granted access to all information pertaining to SQA accredited qualifications.

The awarding body document *CG1 Corporate Governance, April 2017*, states that 'ITC has no partnership arrangements'. It also confirms that if 'a partnership were to be entered into in the future then a copy of any signed written agreement' would be forwarded to the relevant qualification regulator.

Discussions during the audit confirmed that there has been no change to this status and position. The audit team were able to advise that a redacted copy of any such agreement would be acceptable because the main focus of any contract review, in line with the requirements of SQA Accreditation's awarding body audit and provider monitoring strategic plan for 2018–19, focuses on the currency of such agreements, clarity around roles and responsibilities, and evidence that contractual requirements are being met, and not commercially sensitive information such as costings.

The discussion was extended to incorporate third-party agreements, and awarding body representatives confirmed that ITC First has entered into agreements that may have an impact on awarding body activities, and which in turn can impact upon SQA accredited provision.

In such circumstances, the audit team recommends that ITC First considers a similar approach to partnership agreements by providing a redacted version of any contractual agreement, as well as evidence that the performance of the third-party is subject to regular and consistent review to ensure all obligations are met and that there is no negative impact on the awarding body's compliance with SQA Accreditation's regulatory requirements.

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

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

And

Regulatory Principle 7. The awarding body shall have effective arrangements for communicating with its staff, stakeholders and SQA Accreditation.

A review of the awarding body's policies procedures and guidance documentation highlighted a number of anomalies and inconsistencies in referencing the qualification regulator and its regulatory requirements, as well as a lack of appropriate referencing of current SQA Accreditation guidance documentation where appropriate.

For example, across the range of documentation, there is a tendency to use both the generic 'SQA' and more specific 'SQA Accreditation' interchangeably when referring to the qualification regulator.

Also, a small number of documents such as the awarding body's *Record Retention Policy 2018, May 2018*, and the *Conflicts of Interest Policy 2018*, still make reference to the 2011 version of SQA Accreditation's Regulatory Principles.

The audit team also noted some examples of awarding body documentation that it believes would benefit from referencing to current SQA Accreditation guidance. For example, in the case of the documents *BP5 New Qualification Business Case, June 2016* and *Z1 Management of the Withdrawal of Qualifications 2017, June 2017*, referencing to SQA Accreditation's *Developing Qualifications for Accreditation: A Guide for Awarding Bodies, February 2018*, may be appropriate.

Lastly, the shell document used by ITC First for the majority of its policies, procedures and guidance retains a shorthand reference to Quickr, which was the predecessor to SQA SharePoint.

Therefore, as part of its normal version control activities, ITC First may wish to review the full range of policies, procedures and guidance documentation to ensure that references to SQA Accreditation, its regulatory requirements and guidance documentation, are current and fit for purpose.

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

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

Prior to the audit, the *ITC – SQA Self-assessment Report, August 2018*, noted that the 'ITC website was enhanced in July to provide a digital certification option (as determined by ITC on a Centre by Centre and qualification by qualification basis) and to provide candidates with an online validation feature'.

The same report also contained an action, with a target date of 18 October 2018, stating that as the 'ITC website now has the capability to offer digital certification and 24 hour 365 day online verification of digital certificates'. The action itself was to 'make this feature available to Centres for selected qualifications after discussion with SQA Accreditation'.

Consequently, the matter was discussed at length during the audit with awarding body representatives. The audit team had sight of the original proposal/discussion document for the function (titled *Direct Certification*), and saw a run-through of the 'Public Site Validation Page' on the ITC First website site (which is used to check access for checking the authenticity of such certificates), and a proposal to test the process with key centres to ensure that it is robust.

Through discussion, the audit team were satisfied that there was no intention to make the use of digital certification mandatory for providers or learners. Equally, there would be no substantial change to the look of current ITC First certificates when they are issued digitally.

All regulatory requirements as required by *RPDIR -3, Logos and certificate requirements for SQA accredited qualifications,* will remain in place.

Therefore, SQA Accreditation is fully supportive of ITC First's proposal to 'pilot' digital certification in respect of SQA accredited provision using a small number of approved centres to ensure that the system is robust, and to gain a greater understanding of the likely impact upon centres and the potential benefits to learners.

The audit team recommends that, upon completion of this pilot exercise, a report is provided to SQA Accreditation for consideration before a decision is made to make digital certification more widely available to centres approved to deliver SQA qualifications.

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

3 Acceptance of Audit Findings

For and on behalf of ITC First:

For and on behalf of SQA Accreditation:

Print name

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Signature

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