



Audit Report

**The National Examination Board in Occupational
Safety and Health (NEBOSH)**

**30 and 31 May 2018, 11 September 2018,
2 and 3 October 2018, 24 January 2019**

Contents

1 Background	1
1.1 Scope	1
1.2 Audit Report and Action Plan Timescales	3
1.3 Summary of Audit Issues and Recommendations	4
1.4 Risk Rating of Issues	4
2 Detail of Audit Issues and Recommendations	5
2.1 Issues	5
2.2 Recommendations	6
3 Acceptance of Audit Findings	7
4 Appendix 1 — List of Areas reviewed at Audit	8

1 Background

This was the fourth audit of the National Examination Board in Occupational Safety and Health (NEBOSH) since SQA Accreditation approved it as an awarding body in 2009.

NEBOSH was formed in 1979 as an awarding body with charitable status, and offers qualifications designed to meet the health, safety and environmental management needs of all places of work. NEBOSH examinations and assessments are set by its professionally qualified staff and assisted by external examiners, most of whom are Chartered Safety and Health Practitioners or Chartered Environmentalists operating within industry, the public sector or in enforcement.

NEBOSH has achieved ISO 9001:2015 certification having transitioned from ISO 9001:2008 in April 2017. The awarding body also achieved ISO 14001:2015 certification in January 2017.

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 (QER) is calculated.

NEBOSH's QER rating from its July 2016 audit meant that it was not scheduled to be audited until 2019–2020. However, in response to a relatively small but thematic number of learner complaints, SQA Accreditation approached NEBOSH and proposed a series of scoped audits to look at areas of concern.

NEBOSH fully supported and welcomed SQA Accreditation's intervention. Audit activities were targeted, therefore not all aspects of the awarding body's systems, procedures and performance have been considered in this report to the same depth.

The scoped audits were specifically timed to look at pre and post-quality assurance processes for the NEBOSH National General Certificate in Occupational Health and Safety and associated processes around examination marking, question paper setting and practical assignment moderation. As NEBOSH processes are generic across several levels of qualifications, some aspects of the procedures for Diploma awards were also sampled.

SQA Accreditation audit reports are normally written by exception, focusing only on those areas where corrective action is required or recommended. However, in the interest of transparency, a full list of the areas which were reviewed during the visits are listed in Appendix 1.

The audit activities were designed to ensure that NEBOSH 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 NEBOSH's SharePoint site at the time of audit and information supplied during and after audit activities. 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

NEBOSH audit dates:	30, 31 May 2018; 11 September 2018; 2, 3 October 2018; 24 January 2019
Audit Report approved by Accreditation Co-ordination Group on:	27 February 2019
Audit Report to be signed by NEBOSH:	10 April 2019
Action Plan to be e-mailed to regulation@sqa.org.uk by NEBOSH:	10 April 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 QER 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 NEBOSH 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 one Recommendation has been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principles 4 and 5	The NEBOSH policy for Enquiries About Results must be reviewed to avoid learners paying for unnecessary clerical checks.	Low
2. Principle 5	The return of question papers is not being enforced in accordance with published NEBOSH instructions.	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 5 and 13	NEBOSH should consider removing the section on appeals within the EARs procedure into generic appeals documentation to avoid learners pursuing a route that is extremely unlikely to affect results.

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 NEBOSH's QER 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 4. The awarding body shall continually review the effectiveness of its business services, systems, policies and processes.

and

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.

SQA Accreditation receives more feedback from learners who have failed to achieve the result that they expected, than from those learners who have passed assessments. One of the main concerns, which resulted in bringing the planned NEBOSH audit forward, was feedback from learners regarding the Enquiries About Results (EARs) process.

The Audit Team looked at exam and assignment EARs processes in detail and were satisfied that the procedures in place were robust. In addition, the Audit Team spent considerable time reviewing the quality of marking and the quality processes surrounding marking for standard date sitting, on demand and EAR marking. There were no concerns identified in these areas either.

The Audit Team did note that one aspect of the EARs procedure requires clarification in order to address learners' expectations when submitting an EAR. The *Enquiries About Results (EARs) policy and procedures, Version 13 (November 2018)*, outlines the types of EAR available, such as clerical check, remark and clerical check and appeals.

The procedure states that learners can request a Type 1 EAR Clerical Check for £15. However, for the Certificate examinations Linney staff automatically pull and clerical check the addition of marks for all scripts between the mark range of 40–48, as part of an additional quality review.

In theory, this means that learners who have failed to reach the pass mark of 45 may request and pay for a clerical check, without knowing that this process will already have been carried out, and that the additional clerical check is unlikely to change the result. Figures obtained from NEBOSH suggest that very few Type 1 EARs are received, as most learners choose to pay for a Type 2 EAR which includes a full remark and clerical check.

The NEBOSH policy for Enquiries About Results must be reviewed to avoid learners paying for unnecessary clerical checks. If it chooses to continue with them, it should explain the impact on declared marks in the 40–48 range, as these will already have been subject to a clerical check. This has been noted 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.

During the first visit to the Linney Group, where exam materials are processed for NEBOSH, the Audit Team noted that some of the packets being returned from examination venues contained question papers, whilst others did not. The NEBOSH *Instructions for Conducting Examinations v11a (May 2018)* state that 'The return of scripts and question papers **must** be by means of a service with a trackback facility.' It also states that 'All examination materials should be sent back to Linney within two working days'.

NEBOSH staff acknowledged that they do not follow up instances where question papers have not been returned, therefore, the return of question papers is not being enforced in accordance with published NEBOSH instructions. This process requires review for both Certificate and Diploma qualifications. 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.

and

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

In March 2018, NEBOSH made changes to its *Enquiries About Results (EARs) policy and procedures, Version 12 (March 2018)*, as a result of SQA Accreditation feedback which had been provided by course providers. The changes made the EARs process more transparent and managed learners' expectations more effectively. Previously, the section on appeals had suggested that an appeal offered a further stage after an EAR to overturn a learner's mark, when this was not the case. Changes to the document made this clearer.

Figures obtained from NEBOSH show that only five Stage 1 or Stage 2 appeals have ever been made. Stage 1 and 2 appeals only result in a learner's mark being changed when it can be proven that the EARs policy and procedures have not been followed properly and that this has resulted in an unfair judgement. The current version of the *Enquiries About Results (EARs) policy and procedures, Version 13 (November 2018)*, still offers a false expectation to learners that an appeal will affect the outcome of an EAR. This is unlikely to happen and the Audit Team were able to verify that the EARs processes and procedures are robust.

NEBOSH should consider removing the entire section on appeals within the EARs procedure into generic appeals documentation, to avoid learners pursuing a route that is extremely unlikely to affect results. This has been noted as **Recommendation 1**.

3 Acceptance of Audit Findings

For and on behalf of NEBOSH:

For and on behalf of SQA Accreditation:

Print name

Print name

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Laura Walkerdine

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Signature

Signature

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Designation

Designation

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Senior Regulation Manager

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Date

Date

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26 March 2019

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4 List of Areas Reviewed at Audit Appendix 1

30 May 2018

Examiner recruitment
Review of examiner applications
Examiner allocations
NEBOSH Examination Web Tool (NEWT) overview
Centre exceptions
Examiner exceptions
Generating the Provisional Report Lists (PRL)
Results sign off
Review of PRLs including discrepancies and flagging moderation, malpractice and special consideration.
PRL return and mark amendments
Affiliate overview
Exam board confirmation and production of Final Results Lists
Mark roll up
Enquiries About Results

31 May 2018

One day examiner training workshop and training day
Marking procedures
Linney role
Examiner responsibilities
Script allocation, returns and helpline
Marking review
Items and marking schemes
Marking and annotation of scripts
Marking protocols

11 September 2018

Visit to Linney PLC
Assessment Management Centre (AMC) tour
Receipt of papers back from Centres
Scanning back of scripts from Centres
Exceptions Handling
Allocation to examiners
Preparation for out to examiners
Process Mapping Overview
NEWT interfaces
NEBOSH/Linney Service Level Agreement
Quarterly operational reviews — on demand and standard date sittings

2 October 2018

Visit to Linney PLC
Assessment Management Centre (AMC) tour
Receipt of papers back from examiners
Scanning back from examiners
Exceptions handling
Mark checks and full mark checks
Marking review
Process mapping overview
NEWT interfaces

3 October 2018

Enquiry About Results (EARs) processes
Changes to marks as a result of EARs
Affiliate database recording
Appeals
Practical assignments GC3
Moderation processes
Marking review
Requirements for assessors and moderators
Exceptions and malpractice
Accreditation Advisor role
Centre profiling and risk
Accredited Course Provider (ACP) visits
DNI Diploma
Recognition of overall achievement (roll up) and certification
Declaration of results to ACPs

24 January 2019

NEBOSH strategic planning
Item development and commissioning
Constructs and construct validity — theory vs practice
Technical scrutiny
Question paper development
Proportionate representation of syllabus
Mean scores, pass rate prediction
Automatic generation of papers
Review of question paper performance
Assessment panels
Special considerations
Examiner reports
Item lifetimes
Predictability
Item performance
On demand vs standard sitting differences
Content Producer and Surpass software