

Audit Report

RSL Awards

31 March 2021

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1 Background

This was the fifth audit of RSL Awards since it was approved as an awarding body by SQA Accreditation in 2011.

RSL Awards is a nationally recognised awarding body for the contemporary arts and offers Graded Music Exams. The awarding body also offers Highland Dance Qualifications in partnership with UKA Dance. RSL has the lead role within the partnership.

RSL Awards' headquarters are in Teddington, London.

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 scoped and remote audit of RSL Awards, not 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 RSL Awards 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 RSL Awards' 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

RSL Awards audit date:	31 March 2021
Audit Report approved by Accreditation Co-ordination Group on:	5 May 2021
Audit Report to be signed by RSL Awards:	16 June 2021
Action Plan to be emailed to regulation@sqa.org.uk by RSL Awards:	16 June 2021

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 RSL Awards 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, three Issues have been recorded and three Recommendations have been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principle 3	RSL Awards should amend the <i>RSL Awards</i> <i>Ltd, Business plan, Prepared for SQA,</i> <i>September 2020</i> document to formally record the specifics of its growth strategy for Scotland, including SQA accredited provision, reflecting the positive nature of the discussions around this area that took place during the audit.	Low
2. Principles 12 and 13.	Whilst SQA Accreditation is content for RSL Awards to use a composite policy in respect of complaints and appeals, it must be revised to incorporate relevant references to the role of the Scottish Public Sector Ombudsman (SPSO), as well as noting the limited role of the qualification regulator in respect of academic judgements.	Low
3. Principles 15 and 6	Given the contradictions that exist between the available data, the awarding body's understanding of the situation regarding the uptake of SQA accredited qualifications during the pandemic, as well as the possibility that said data may be erroneous, RSL Awards should review the accuracy of the quarterly data returns for 2020/2021 submitted to SQA Accreditation.	Low

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 3	RSL Awards may wish to provide SQA Accreditation with evidence of this effective business continuity planning conducted through regular business activities, such as board or senior management team meetings, and how the effectiveness of said activities will be measured.
2. Principle 6	RSL Awards has indicated an intention to conduct a full review of policies, procedures, and guidance during 2021. The awarding body may wish to factor in the projected launch of SQA Accreditation's revised regulatory principles before completing this work, and uploading updated policies, procedures, and guidelines to SQA Info Centre (SharePoint).
3. Principle 15 and RPDIR - 3	RSL Awards noted its intention to introduce e-certification during 2021. The awarding body may wish to provide a formal overview of its implementation plans, including certificate authentication, as well as providing copies of the relevant e-certificates to ensure that they are compliant with Regulatory Principles Directive RPDIR — 3 Logos and certificate requirements for SQA accredited 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 RSL Awards' 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 <u>SQA</u> <u>Accreditation website</u>.

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

In 2020, RSL Awards provided a business plan as an accompaniment to its annually submitted self-assessment report. Titled *RSL Awards Ltd, Business plan, Prepared for SQA, September 2020*, the business plan provides information on the awarding body's growth strategy for both the United Kingdom (UK) and international markets.

In this respect, the business plan is a comprehensive piece of work that outlines global performance to date, ongoing challenges facing the business, as well as planned expenditure for 2022 to meet those challenges across all territories. However, in respect of the strategy for the United Kingdom, the Auditor found it difficult to identify significant references to Scotland or SQA accredited provision.

Discussions before and during the audit established that the awarding body has a plan to increase and develop its market and qualification availability in Scotland which includes an intention to increase in the number of examination venues available geographically for graded music exams, increase the number of teachers available to deliver RSL provision, as well as the accreditation and introduction of vocational qualifications into the college network where possible.

Therefore, RSL Awards should amend the business plan document to formally record the specifics of its growth strategy for Scotland, including SQA accredited provision, reflecting the positive nature of the discussions around this area that took place during the audit.

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.

and

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

In preparation for the current audit, the Auditor reviewed the RSL Awards' website and noted that the awarding body had revised and updated its policies in respect of complaints and appeals, combining existing policies to produce a single policy titled, *Complaints, Enquiries and Appeals Policy, (Graded Examinations and Diplomas), January 2021.*

Previously, the awarding body published separate policies and procedures in respect of complaints and appeals, which were used in respect of the awarding body's graded music

examinations. Where deemed appropriate, these policies are adopted by partnership organisations such as UKA Dance for other accredited provision in the performing arts sector.

A review of the revised policy found it be logical and robust, but it was noted that references to the role of the Scottish Public Sector Ombudsman (SPSO) in any complaints, as well as the limited role of SQA Accreditation with respect to academic judgments, had been omitted.

Therefore, whilst SQA Accreditation is content for RSL Awards to use a composite policy in respect of complaints and appeals, it must be revised to incorporate relevant references to the role of the SPSO, as well as noting the limited role of the qualification regulator in respect of academic judgements.

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

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

RSL Awards indicated that there had been a significant downturn in registrations for SQA accredited qualifications across 2020 because of the impact of the COVID-19 pandemic, making it difficult to deliver live assessments.

However, a review of the quarterly data submissions for the year, whilst evidencing an initial halt to delivery due to the initial UK wide lockdown around March/April 2020, appeared to show a gradual increase in candidate uptake across the year.

During the audit discussions, awarding body representatives were unable to explain why the submitted data ran contrary to their perception of the situation and were concerned that other registrations may have been incorrectly reported against SQA accredited qualifications.

Therefore, given the contradictions that exist between the available data, the awarding body's understanding of the situation regarding the uptake of SQA accredited qualifications during the pandemic, as well as the possibility that said data may be erroneous, RSL Awards should review the accuracy of the quarterly data returns for 2020/2021 submitted to SQA Accreditation.

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

2.2 Recommendations

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

RSL Awards provided details on how it tested and continued to undertake business continuity planning in the lead up to and during the COVID-19 pandemic in 2020.

Awarding body representatives were able to outline how existing business continuity planning was tested, in line with the published policy during 2019, and how delivery in international markets such as China, in early 2020, provided insights into the operational impact of the pandemic, allowing for considered steps to be taken around the implementation of remote activity. Consequently, the awarding body realised that much of its existing business continuity planning could be undertaken through its existing operational and management structure.

Therefore, RSL Awards may wish to provide SQA Accreditation with evidence of this effective business continuity planning conducted through regular business activities, such as board or senior management team meetings, and how the effectiveness of said activities will be measured.

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

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

RSL Awards has indicated an intention to conduct a full review of policies, procedures, and guidance during 2021. SQA Accreditation is conscious that the operational impact of COVID-19 in 2020 has necessitated some aspects of this work, principally around qualification delivery and assessment, to be prioritised, with other areas re-scheduled for later in the year.

Consequently, the awarding body may wish to factor in the projected launch of SQA Accreditation's revised regulatory principles before completing this work, and uploading updated policies, procedures, and guidelines to SQA Info Centre (SharePoint).

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

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

In the self-assessment report for 2020, RSL Awards noted its intention to introduce ecertification during 2021. During the audit, awarding body representatives explained the rationale underpinning this potential development. These included cost savings around printing and postage, leading to a quicker turnaround timescale for learners receiving certificates, and subsequent reduction of the awarding body's environmental footprint.

Whilst, SQA Accreditation fully supports such a development, the awarding body may wish to provide a formal overview of its implementation plans, including certificate authentication, as well as providing copies of the relevant e-certificates to ensure that they are compliant with Regulatory Principles Directive RPDIR — 3 Logos and certificate requirements for SQA accredited qualifications.

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

3 Acceptance of Audit Findings

For and on behalf of RSL Awards:

For and on behalf of SQA Accreditation: