

Audit Report

RSL

23 January 2019

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1 Background

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

RSL 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's 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 full audit of RSL, 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.

As Highland Dance qualifications were considered to be part of the scope of this audit, a representative from UKA Dance participated during the morning session.

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 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 and partnership documentation considered for review by the Audit Team includes all documents banked on RSL'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

RSL: audit date:	23 January 2019
Audit Report approved by Accreditation Co-ordination Group on:	6 February 2019
Audit Report to be signed by RSL:	20 March 2019
Action Plan to be e-mailed to regulation@sqa.org.uk by RSL:	20 March 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 RSL 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	<p>There appeared to be different interpretations of the duration of the <i>Accredited Qualification Agreement</i> with UKA Dance and when it was due to expire. A lack of schedules attached to the revised agreement previously submitted to SQA Accreditation was thought to be an oversight by RSL representatives.</p> <p>Although it was stated by all parties that the agreement would be subject to an extension as per Clause 8.1, the audit team were unable to see evidence of the decision making process that underpinned this development.</p>	Medium
2. Principles 3 and 15	<p>RSL was unable to provide an update and evidence of final actions taken in respect of 301 erroneous certificates issued between February and July 2017 in respect of SQA accredited Graded Music examinations.</p> <p>Therefore, SQA Accreditation is unable to determine the effectiveness of the actions taken and to understand RSL's risk appetite with regard to possible future instances of the same problem.</p>	Medium
3. Principles 6 and 15	<p>On reviewing quarterly registration and certification data submissions for RSL's <i>Graded Examinations in Popular Music Performance</i>, it was noted that there appeared to be more certifications than registrations.</p>	Low

4. Principle 14	<p>There was no evidence available at the audit that an Issue raised in the recent RSL provider monitoring report of 2 December 2018, regarding Reasonable Adjustments, had been entered in the Malpractice Log by either RSL or UKA Dance as per policy.</p> <p>Also, policy documents of both RSL and UKA Dance do not adequately and consistently reflect the need to notify the qualification regulator of suspected or actual malpractice/maladministration upon discovery.</p>	Low
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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	RSL may wish to review both the current <i>Conflict of Interest Policy, 2014</i> and <i>Conflicts of Interest – Guidance</i> documents to ensure that they are both current, reflect the role of SQA Accreditation as a qualification regulator, and are consistent with the more proactive approach to the management of such conflicts across all personnel within both the awarding body and partner organisations.
2. Principles 7 and 15	RSL may wish to consider taking a more proactive approach to measuring whether it meets its customer service timescale of issuing certification within six weeks, as well as establishing whether the procedure for certification and the published timescale both remain fit for purpose.
3. Principle 8	<p>RSL may wish to ensure that any examination venues, public or private, at which SQA provision is delivered are identified to SQA Accreditation for provider monitoring purposes as part of the annual centre list.</p> <p>RSL may also wish to review examinations undertaken at private venues in Scotland since the previous audit, held on 22 March 2017, to determine if candidates undertook SQA accredited examinations, and if so, whether any subsequent registration and certification data has been included within the relevant quarterly data returns.</p>
4. Principle 10	RSL may wish to ensure the availability of formal written feedback on the actions taken by UKA Dance in response to the recommended improvements. It should also give consideration to making this feedback available to SQA Accreditation by uploading the document to SharePoint.
5. Principle 11	RSL may wish to consider a review of both the Reasonable Adjustments and Special Consideration logs with a view to including information on both the qualification/examination, and qualification regulator. This would allow for a more focussed interrogation and analysis of the information in respect of both, which may facilitate a better understanding of the effectiveness of the steps taken by the awarding body to support candidates.

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'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.

At the previous RSL awarding body audit on 22 March 2017, SQA Accreditation raised two Issues in respect of accuracy of changes to the *Accredited Qualification Agreement* held with UKA Dance, made without recourse to the qualification regulator, as well as the implementation of the published quality assurance processes in respect of Highland Dance qualifications, as specified in the relevant version of RSL's *Operations Manual for Dance Partnerships*.

Both Issues were subsequently closed out to the satisfaction of SQA Accreditation. Follow up discussions during the current audit highlighted the fact that the quality assurance activities around partnership working had continued to be enhanced to the satisfaction of both RSL and UKA. However, it became apparent during the discussions that there was no consensus on the accuracy and currency of the version of the agreement uploaded to SharePoint to close out the action raised as part of the 2017 audit.

There also appeared to be different interpretations on the duration of the agreement with UKA Dance and when it was due to expire. A lack of schedules attached to the revised agreement, outlining fees and relevant qualifications, was thought to be unusual by some RSL representatives and it was suggested that this was an oversight.

Lastly, although it was stated by all parties that the agreement would be subject to an extension as per Clause 8.1, the audit team were unable to see evidence of the decision making process that underpinned this development.

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

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

And

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

In October 2017, SQA Accreditation was formally notified by RSL's Head of Quality Assurance that 301 inaccurate certificates were issued to candidates who had successfully undertaken SQA accredited Graded Music exams between February and July of that year.

The error was discovered as a consequence of an internal audit by RSL's Operations Team which highlighted that the error was the incorrect identification of Ofqual as the qualification regulator on the certificates.

The awarding body noted that a full certificate recall had been undertaken and provided exemplar copies of correspondence issued to students, teachers and parents where appropriate. The respective examination locations were also identified. A spreadsheet containing individual student data was available but not directly supplied to SQA Accreditation to ensure no data protection issues arose.

Subsequently, by January 2018, SQA Accreditation was notified that 72 certificates had been returned and reissued with the correct information, with the remainder being chased up by a project group set up to oversee the matter.

No further information was forthcoming from RSL and the audit team sought further clarification of the situation and subsequent outcome of the project, as well as access to the spreadsheet containing the individual candidate data, as part of the audit.

Unfortunately, the majority of RSL's representatives were not in place within the organisation at the time of the event and had no direct knowledge of the matter. Therefore, they were unable to provide further clarification. An attempt to obtain any documentation relating to the event, including the spreadsheet containing the individual candidate data, was unsuccessful.

RSL is to be commended for identifying the issue through its internal audit activities and for ensuring that timely action was taken to address the matter. However, it is a concern that no information is currently available regarding how many certificates were subsequently revised, and which candidates were affected. Also a concern is the lack of information on the decision making around actions taken, and the likely risk of reoccurrence, which would have enabled SQA Accreditation to determine the effectiveness of the steps taken and understand RSL's risk appetite with regard to possible future instances of the same problem.

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

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

And

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

On reviewing quarterly registration and certification data submissions for RSL's *Graded Examinations in Popular Music Performance*, it was noted that there appeared to be more certifications than registrations.

A number of possible reasons for the anomaly were discussed at the audit, ranging from registration and certification of candidates occurring in different quarters, to the possibility of replacement certificates being erroneously included within the data. However, no firm conclusion was reached and further analysis of the data submitted will be required.

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

Regulatory Principle 14. The awarding body and its providers shall ensure that it has safeguards to prevent and manage cases of malpractice and maladministration.

In respect of Reasonable Adjustments, the following Issue was raised in RSL's most recent provider monitoring report, dated 2 December 2018:

The teacher and both learners have not complied with UKA Dance *Reasonable Adjustments and Special Considerations* procedure, which states that 'Learners and Teachers should send requests for reasonable adjustments to UKA Dance before the assessment'.

A review of UKA Dance's *Malpractice Policy, November 2018*, noted that 'failure to adhere to the requirements of our *Reasonable Adjustments and Special Considerations Policy*' constitutes malpractice. However, there was no evidence available at the audit to confirm that this incident had been recorded as such by either RSL or UKA Dance in the Malpractice Log.

Through discussion, consensus was reached that as appropriate supporting evidence had been provided by the Teacher, the Examiner, with the support of the Chief/Senior Examiner, acted in the best interest of all parties involved by accepting a late request for a Reasonable Adjustment, as it avoided any sense of disadvantage to the candidate and likely disruption to the examination timetable.

It was also agreed that the Teacher in question would benefit from further development activity by UKA Dance on the need to adhere to the organisation's *Reasonable Adjustments and Special Considerations Policy, November 2018*. Therefore, it was concluded that to class such incidents as malpractice, as per policy, would be somewhat counter-productive before any development activity had taken place.

RSL's Head of Quality Assurance indicated that there would be, as a priority, a review of both RSL and UKA Dance's approach to determining what constitutes malpractice and maladministration.

SQA Accreditation views a review as timely, given such scenarios, and also because the respective policies of both organisations are not consistent in how they reflect the need to notify the qualification regulator of both suspected and/or actual malpractice/maladministration.

RSL's *Malpractice Policy, July 2018* does not adequately reflect the fact that the awarding body must inform SQA Accreditation when cases, or suspected cases, of malpractice and/or maladministration are discovered.

UKA Dance's *Malpractice Policy, November 2018* does recognise the need to alert SQA Accreditation of suspected or actual cases of malpractice and/or maladministration, but only 'where applicable' and only at the stage when an investigation has taken place. It is also not specified if any such notification would be made directly to the qualification regulator or through RSL, given the partnership relationship.

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

2.2 Recommendations

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

RSL may wish to review both the current *Conflict of Interest Policy, 2014*, and *Conflicts of Interest – Guidance* document to ensure that they are both current, reflect the role of SQA Accreditation as a qualification regulator, and are consistent in outlining the more proactive approach to the management of such conflicts across all personnel within both the awarding body and partner organisations.

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

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

And

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

RSL's *Customer Service Statement, May 2017* notes that the awarding body will 'under normal circumstances issue results and certificates' for Graded examinations and Diplomas within a 'maximum of six weeks after the examination'.

The awarding body was unable to elaborate on how progress against this published timescale was measured, with representatives suggesting that it may well be monitored on an examination-by-examination basis with reporting by exception, should the deadline of six weeks be missed. However, this process was not evidenced.

Therefore, RSL may wish to consider taking a more proactive approach to measuring whether it meets its customer service timescale of issuing certification within six weeks, as well as establishing whether the procedure for certification and the published timescale both remain fit for purpose.

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

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

RSL's website advertises the option for private exams to take place outside the public period of exams normally used by RSL as follows:

Rockschool Private Exams are exam days hosted at a venue of your choice, enabling your students to sit their Graded Exam in the comfort of a familiar setting, using equipment they are accustomed to.

Key information is also provided on the centre requirements and application process that must be used for such examinations.

Consequently, the audit team sought information on the use of venues other than the four public venues regularly identified to SQA Accreditation within the annual centre listing, for provision of SQA accredited qualifications.

RSL representatives noted that at least one private examination venue in Scotland had been used for Graded Music examinations in 2018, but it had yet to determine if SQA qualifications were examined there.

Therefore, RSL may wish to ensure that any additional examination venues, public or private, at which SQA provision is delivered are identified to SQA Accreditation for provider monitoring purposes as part of the annual centre list.

It may also wish to review examinations undertaken at private venues in Scotland since the previous audit, held on 22 March 2017, to determine whether candidates undertook SQA accredited examinations there, and if so, whether any subsequent registration and certification data has been included within the relevant quarterly data returns.

This has been noted as **Recommendation 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.

RSL's monitoring report for their partner organisation's standardisation meeting, dated 1 June 2018, highlighted a range of 'Points for improvement' for UKA Dance. At the time of the audit, it was noted that RSL had received verbal feedback on the actions taken by UKA Dance to address the points for improvement. However, no evidence of a formal documented response was available for the audit team to review.

Therefore, RSL may wish to ensure that formal written feedback is given on the actions taken by UKA Dance in response to the recommended improvements. It should also consider making this feedback available to SQA Accreditation by uploading the document to SharePoint.

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

Regulatory Principle 11. The awarding body shall ensure that its qualifications and their assessment are inclusive and accessible to learners.

The audit team was able to review the awarding body's logs which record requests for both Reasonable Adjustments and Special Considerations.

Both logs contained a breadth of information regarding the nature of the requests and decisions taken by RSL. However, the audit team were unable to determine specific instances linked to SQA accredited provision.

Therefore, RSL may wish to consider including information on the qualification/examination and qualification regulator in both the Reasonable Adjustments and Special Consideration logs. This would present the relevant information more fully and accessibly, which may aid understanding of the effectiveness of the steps taken by the awarding body to support candidates.

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

3 Acceptance of Audit Findings

For and on behalf of RSL:

For and on behalf of SQA Accreditation:

Print name

Print name

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Signature

Signature

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Designation

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