



Audit Report

Safety Training Awards

10 October 2017

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1 Background

This was the sixth audit of Safety Training Awards (STA) since it was approved as an awarding body by SQA Accreditation in June 2009.

STA is a nationally recognised awarding body offering qualifications in the following areas: teaching swimming, pool emergency and response, pool life guarding, aquatic teaching and emergency first aid at work.

STA was formed in 1932 and is a company limited by guarantee. The awarding body is a registered charity in England and Scotland. STA's headquarters are situated in Walsall. The audit team was provided with full access to the awarding body's Walsall premises, staff and documentation.

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 STA, 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 STA 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 STA'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

STA audit date:	10 October 2017
Audit Report approved by Accreditation Co-ordination Group on:	25 October 2017
Audit Report to be signed by STA:	7 December 2017
Action Plan to be e-mailed to regulation@sqa.org.uk by STA:	7 December 2017

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 STA 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 one Recommendation has been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principle 1 and 7	The awarding body must ensure that its procedure for reporting incidents adequately reflects SQA Accreditation and its requirements.	Medium
2. Principle 3	STA's business planning and risk recording systems around its awarding body activities are not robust and must be regularly reviewed to demonstrate that planned targets are being monitored towards completion.	Medium
3. Principle 5 and 13	The awarding body must make it clear that learners cannot appeal to SQA Accreditation and must make a referral or complaint in the first instance. It must update its documentation and webpages to refer to SQA Accreditation appropriately.	Medium
4. Principle 14	STA must document how it deals with cases of maladministration and update its policy to ensure that SQA Accreditation is informed of both suspected and actual cases of malpractice and maladministration.	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 1	STA and SQA accreditation should arrange formalised twice-yearly meetings where both parties share updates on awarding body and regulatory matters.

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 STA'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.

and

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

Prior to the audit, the Lead Auditor was able to carry out a desktop review of the documents banked on SharePoint and a number of Issues were identified as part of this process.

STA has a *Procedure for Notification and Management of Adverse Effects*. It is not clear whether the procedure applies to qualifications accredited by SQA Accreditation because the definitions and examples provided are very much focused towards another regulator. The awarding body must ensure that its procedure for reporting incidents adequately reflects SQA Accreditation and its requirements. This has been recorded as **Issue 1**.

SQA Accreditation has recently produced *Regulatory Principles Guidance Notes*. This provides awarding bodies with support on how to report incidents and gives examples of what types of incident we expect to be made aware of. The awarding body may wish to consider the guidance when addressing this Issue.

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

STA has a *Business Plan 2016* with 19 high-level objectives with 'achieve by' outcomes and timescales. The Lead Auditor was informed that the business plan was regularly reviewed at Senior Management Team meetings, but was only able to see evidence of detailed review from the minutes of one meeting. It was unclear from these whether all the objectives had been completed.

None of the 19 objectives had a completion date beyond September 2017. Having asked when the next business plan was going to be produced, the Lead Auditor was informed that this would not be until June 2018. This leaves a significant gap in the planning process plans where no objectives will have been set. It was also questioned whether some of the targets were set following the SMART methodology and whether STA had set itself too many high-level objectives to adequately manage over a short period of time.

Business planning has been discussed with senior STA staff at previous audits as there has been a distinct lack of documented planning over a period of time. The Lead Auditor was not satisfied that as a business planning document it properly represents the interests of accredited qualifications, or that it had been frequently reviewed to measure progress.

It was acknowledged that the business plan had been produced to meet another regulator's business planning requirements and as a result it was focused very much on the activities of the Swimming Teachers Association as a holistic entity rather than Safety Training Awards as an awarding body.

The Lead Auditor also reviewed the corporate *Risk Register* and noted that significant potential risks in relation to the development of a new IT system were not included. These developments will dramatically affect the way in which STA conducts business with its stakeholders, and are a significant move away from dealing with tutors and course organisers and towards the creation of new Approved Training Centres (ATCs).

This marks a big departure from STA's existing model and will involve risks on a number of levels. After some discussion around implementation, communication and timescales for delivery, it was acknowledged that these risks should be captured in the business plan.

STA's business planning and risk recording systems around its awarding body activities are not robust and must be regularly reviewed to demonstrate that planned targets are being monitored towards completion. This has been recorded as **Issue 2**.

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.

The *Safety Training Awards Enquiries and Appeal Policy 2017* was reviewed prior to audit. The awarding body's policy states that 'If the learner is not satisfied with the appeal committee's decision they may refer their appeal to the appropriate Regulatory Authority i.e. Ofqual (England), SQA (Scotland).'

The awarding body has been reminded on a number of occasions that it should refer to SQA Accreditation in its documentation. A review of the website also showed that its qualification pages still refer to SQA as the regulator of its accredited qualifications.

The awarding body must make it clear that learners cannot appeal to SQA Accreditation, and must make a referral or complaint in the first instance. It must also update its documentation and webpages to refer to SQA Accreditation appropriately. 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.

The *Malpractice Policy 2013* was reviewed prior to audit. From the date of the policy it would appear it had not been reviewed for a number of years. It does not describe how STA deals with maladministration. The policy also states that 'STA AB will then investigate the alleged irregularities and in all cases, notify the regulatory authorities, once malpractice has been proven'.

SQA Accreditation's Regulatory Principles (2014) states that 'The awarding body must inform SQA Accreditation when any cases, or suspected cases, of malpractice and/or maladministration are discovered', not just where these have been proven.

STA must document how it deals with cases of maladministration, and must update its policy to ensure that SQA Accreditation is informed of both suspected and actual cases of malpractice and maladministration. This has been recorded as **Issue 4**.

2.2 Recommendations

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

The Audit Team spent a significant amount of time with the Chief Executive Officer and senior staff discussing the awarding body's progress since the last audit and the challenges around governance that it has faced.

Whilst progress has perhaps not been as fast as both parties would have hoped, the new senior management has definitely made improvements and has managed the changes that have been required by SQA Accreditation.

It is important for SQA Accreditation to be kept informed regarding the impact of business developments at STA, particularly where the audit frequency is not annual. Therefore, the Lead Auditor suggested that regular meetings on at least a twice-yearly basis, and this was agreed with the Chief Executive Officer.

STA and SQA accreditation should arrange formalised bi-annual meetings where both parties share updates on awarding body and regulatory matters. This has been noted as **Recommendation 1**.

3 Acceptance of Audit Findings

For and on behalf of Safety Training Awards:

For and on behalf of SQA Accreditation:

Print name

Print name

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SCOTT MARKWICK

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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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25 OCTOBER 2017

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