



Audit Report

Smart Awards

5 December 2019

Contents

1 Background	1
1.1 Scope	1
1.2 Audit Report and Action Plan Timescales	2
1.3 Summary of Audit Issues and Recommendations	3
1.4 Risk Rating of Issues	5
2 Detail of Audit Issues and Recommendations	6
2.1 Issues	6
2.2 Recommendations	7
3 Acceptance of Audit Findings	10

1 Background

This was the first audit of Smart Awards since it was approved as an awarding body by SQA Accreditation on 5 December 2018.

Smart Awards develops, delivers and certificates qualifications and training programmes that meet the needs of the telecommunications, smart metering and the highway industries.

Smart Awards are based in Berkswell, Coventry.

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 Smart Awards, 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 Smart 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 Smart 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

Smart Awards audit date: 5 December 2019

Audit Report approved by
Accreditation Co-ordination Group on: 22 January 2020

Audit Report to be signed by Smart Awards: 4 March 2020

Action Plan to be emailed
to regulation@sqa.org.uk by Smart Awards: 4 March 2020

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 emailed 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 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 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 emailed to Smart 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 five Recommendations have been noted.

Issue	Detail of Issue recorded	Risk rating
1. Principle 11	A review of the <i>Equality and Diversity Policy, QUA024-4.0, 01/03/2016</i> , identified that further clarity is required in outlining the protected characteristics as defined by the Equality Act 2010.	Low
2. Principle 13	A review of the <i>Appeals Policy, QUA161- 4.0, 01/03/2016</i> , indicated a need to revise some of the wording around the role of SQA Accreditation in the appeals process.	Low
4. Principle 14	A review of the <i>Malpractice and Maladministration Policy, QUA098 – 4.0, 01/03/2016</i> , noted no appropriate references to informing SQA Accreditation of both actual and suspected malpractice and maladministration upon discovery.	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 6.	Smart Awards may wish to review its version control of policies, procedures and other relevant documentation to ensure that current versions are available on SharePoint.
2. Principles 6 and 10.	Smart Awards may wish to consider rationalising the range of quality assurance documents available, as well as ensuring the consistency of information on the number of EQA visits to be undertaken, as a means of confirming that the process remains relevant to SQA accredited provision.
3. Principles 9 and 10.	The awarding body may wish to re-visit its marketing strategy for the SVQ in Customer Service at SCQF level 6 to determine if the qualification remains a viable product.
4. Principle 10 and 15.	The awarding body may wish to consider providing enhanced guidance and procedures in respect of Direct Claim Status (DCS) to ensure consistency of application for SQA accredited provision.
5. Principle 14.	Smart Awards may wish to consider further enhancing its <i>Whistleblowing Policy, QUA071-4.0, 01/03/2016</i> through the inclusion of appropriate references to the Public Interest Disclosure Act 1998, as this is the current United Kingdom legislation for this area.

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

A review of the *Equality and Diversity Policy, QUA024-4.0, 01/03/2016*, identified that further clarity is required in outlining the protected characteristics as defined by the Equality Act 2010.

Currently, the policy makes a general reference to ensuring that 'learners with protected characteristics' are neither advantaged nor disadvantaged when undertaking awarding body qualifications or assessments. However, there is no legislative context or explanation of what constitutes a protected characteristic in respect of education.

Specific protected characteristics are noted throughout the policy document but not in a consistent and coherent fashion. In some cases, the name of the protected characteristics has been altered, with associated descriptions of individual characteristics deviating from those provided in the Act itself.

The audit team is clear that the awarding body's approach to equality and diversity is a robust one, but is concerned that amendments to legislated areas such as protected characteristics, albeit carried out in good faith, could leave the organisation open to complaints or legal challenge.

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

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

A review of the *Appeals Policy, QUA161- 4.0, 01/03/2016*, indicated a need to revise some of the wording around the role of SQA Accreditation in the appeals process. In particular, the assertion 'that where appeals have been referred to the regulators, assessment decisions or academic judgements will not be overturned' lacks clarity.

Though factually correct, the wording could be taken to infer that an appeal referred to the regulator may result in punitive action by the awarding body through a refusal to overturn assessment decisions/academic judgements irrespective of the findings of an appeal.

This inference is at odds with the tone of the rest of the policy, which sets out a clear, logical and supportive approach to considering appeals. It is also at odds with the wording of the supplementary information for RP 13, which states that 'the awarding body and its providers should ensure that their documentation is clear that SQA Accreditation is unable to overturn assessment decisions or academic judgements'.

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

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

A review of the *Malpractice and Maladministration Policy, QUA098 – 4.0, 01/03/2016*, noted a lack of clarity around informing SQA Accreditation of both actual and suspected malpractice and maladministration upon discovery.

The policy states that in ‘all cases of suspected or actual malpractice or maladministration resulting in a regulatory incident, Smart Awards will notify the regulators, SQA Accreditation or Ofqual at the earliest opportunity’.

The associated process outlined in the policy for managing instances of malpractice and maladministration indicates that the appropriate regulator will be notified ‘in a timely manner’ and states five working days from receipt of the initial information.

However, the associated process map makes no reference to an early notification of the regulators, noting that SQA Accreditation or Ofqual will be notified after a review of information has taken place by the awarding body’s Quality and Audit Committee.

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

2.2 Recommendations

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

In respect of its *Record Management Policy, QUA035-2.0, 01/03/2017*, Smart Awards may wish to review its version control of policies, procedures and other relevant documentation to ensure that current versions are available on SharePoint.

In reviewing a range of documentation held on SharePoint, the audit team noticed that document referencing and issue dates did not always correspond to the versions submitted as part of the awarding body approval process in 2018.

Although the content of the sampled documentation remained largely consistent, a number of the documents currently held on SharePoint contained issue dates that preceded the dates on the versions submitted as part of the awarding body approval process.

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

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

And

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.

Smart Awards has a range of External Quality Assurance/Quality Assurance documentation both available on SharePoint and for review as part of the audit.

These include the awarding body's *Quality Assurance Model, QUA080-2.0, 01/03/2017*, the *Quality Assurance Guidance, QUA120-3.0, 01/03/2016*, and the *EQA Manual, QUA250-4.0, 01/03/2016*. Also, other documents such as the awarding body's *Centre Guidance, QUA 078-3.0, 01/03/2017* and *Scotland Centre Guidance, QUA 078-4.0, 01/06/2018*, which contain relevant quality assurance information.

The awarding body may wish to consider rationalising the range of quality assurance documents available, as well as ensuring the consistency of information on the number of EQA visits to be undertaken, as a means of confirming that the process remains relevant to SQA accredited provision.

This has been noted as **Recommendation 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.

And

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.

At the time of the audit, Smart Awards had no recorded candidate uptake for its only SQA accredited qualification, the SVQ in Customer Service at SCQF Level 6, GP4L 46.

Awarding body representatives acknowledged that there had been no further progress in marketing the qualification since the post-approval visit, which took place on 3 July 2019, and at which promotional materials were provided to SQA Accreditation representatives. Also, through discussion, it transpired that the awarding body does not have an approved centre for the delivery of the SVQ.

The audit team are conscious of the fact that the awarding body's focus has been on the launch of its Network Operative Card Scheme and the development of qualifications in both Overhead Safety and Underground Safety, with the latter qualifications possibly being accredited and providing a significant level of candidate registrations.

Nevertheless, the awarding body may wish to re-visit its marketing strategy for the SVQ as a means of increasing candidate uptake and approved centres and determining if the qualification remains a long-term viable product.

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.

And

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

A review of the awarding body's *Centre Guidance, QUA078-3.0, 01/03/2017* and *Scotland Centre Guidance, QUA078-4.0, 01/06/2018*, noted the intention to use Direct Claim Status (DCS) where appropriate.

While both documents outline the benefits of DCS to centres and provide a number of basic criteria around granting DCS status, the audit team are of the opinion that the awarding body may wish to consider providing enhanced guidance and procedures to ensure consistency of application for SQA accredited provision.

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

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

Smart Awards may wish to consider further enhancing its *Whistleblowing Policy, QUA071-4.0, 01/03/2016* through the inclusion of appropriate references to the Public Interest Disclosure Act 1998, as this is the current United Kingdom legislation.

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

3 Acceptance of Audit Findings

For and on behalf of Smart Awards:

For and on behalf of SQA Accreditation:

Print name

Print name

.....

LAURA WALKERDINE

.....

Signature

Signature

.....

.....

Designation

Designation

.....

SENIOR REGULATION MANAGER

.....

Date

Date

.....

22 JANUARY 2020

.....