



## Action Plan

This Action Plan must be completed electronically and submitted in Microsoft Word format to [regulation@sqa.org.uk](mailto:regulation@sqa.org.uk) by 9 January 2023.

Issue number	Detail of Issue recorded	Risk rating	Proposed action and evidence to be provided (Failure to include a description of your intended methodology AND details of the evidence that you will provide could result in your Action Plan not being approved by ACG.)	Target date for completion by awarding body <sup>1</sup>	Date Issue closed out by SQA Accreditation <sup>2</sup>
1. Principle 5	In reviewing both the AFS website and the <i>Licensing Board Members' Qualification at SCQF level 6: Alcohol Focus Scotland Assessment Methodology</i> (April 2022), it was unclear to the Accreditation Auditor if candidates had to re-sit within the 12-week window after	Medium	Having reviewed the Licensing (Scotland) Act 2005 again we can confirm that the 12-month period for re-sit noted in the Licensing Board Members' (LBM) Assessment Methodology is a mistake, and that this should be revised to state that re-sits must be taken within the 3-month period following election to the licensing board.  We can confirm that all candidates that required to take a re-sit during 2022 did so within the 3-month timeframe stipulated.	8 March 2023	08/03/2023

<sup>1</sup> If the awarding body believes it has completed the action prior to approval of the Action Plan by ACG, insert the considered date of completion. The date will be subject to review depending on the quality of the evidence supplied.

<sup>2</sup> Issues can only be closed out once the evidence to complete the action has been quality reviewed and the Action Plan has been approved by ACG. The period of time between ACG approval and the date the Issue is closed out is not necessarily reflective of any quality issues.

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	appointment, or within 12 months of sitting the assessment.		<b>Action:</b> <ul style="list-style-type: none"> <li>We will amend the <i>LBM Assessment Methodology</i> and the <i>Alcohol Focus Scotland (AFS) Centre Guidance LBM Qualification</i> to state that re-sits must be taken within the 3 months post-election to the licensing board in order to comply with the Licensing (Scotland) Act 2005.</li> <li>The AFS website information will be updated to include a statement on re-sits to this effect also.</li> </ul> <b>Evidence to be provided to SQA Accreditation:</b> <ul style="list-style-type: none"> <li>Updated documentation.</li> <li>Updated website information.</li> </ul>		
2. Principle 9	Provider 1 has not complied with <i>AFS Awarding Body Regulations</i> (August 2022) which specify that video recordings associated with the exam	High	This was due to a misunderstanding between AFS and our commissioned remote invigilation provider. Video recordings are made of all examinations by the remote invigilation provider but are only retained for 6 weeks. AFS did not appreciate this time limit and had intended to download video recordings to retain for our own	8 March 2023	08/03/2023

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	are to be retained for five years.		<p>quality assurance purposes for 5 years as stipulated in the AFS Awarding Body Regulations.</p> <p>When this error was identified during the Provider Monitoring Visit, AFS immediately contacted the remote invigilation provider and retrieved all of the available video recordings that were still available within the 6-week period. Video recordings are saved on the AFS system for exams held from 26 August 2022.</p> <p><b>Action:</b></p> <ul style="list-style-type: none"> <li>• We propose to continue to download all available video recordings from the remote invigilation provider and retain for the purposes of External Verification (EV). Video recordings will be retained for 3 months after annual EV.</li> <li>• Amend the <i>AFS Awarding Body Regulations</i> and <i>AFS Quality Assurance Policy</i> to stipulate that video recordings will be retained for 3 months post EV and that a sample of 10% of video recordings will be reviewed for internal quality assurance purposes.</li> </ul> <p><b>Evidence to be provided to SQA Accreditation:</b></p> <ul style="list-style-type: none"> <li>• Amended <i>AFS Awarding Body Regulations</i>.</li> </ul>		

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			<ul style="list-style-type: none"> <li>Amended <i>AFS Quality Assurance Policy</i>.</li> </ul>		
3. Principle 12	<p>Provider 1 was unable to provide the Accreditation Auditor with copies of <i>Licensing Board Members' Qualification</i> certificates for both of its new tutors. It also could not provide a completed tutor observation record for one of its new tutors to confirm they had been observed in their first year of delivery.</p> <p>The Accreditation Auditor was unable to confirm that Provider 1 had complied with <i>AFS Internal Quality</i></p>	Medium	<p>The <i>AFS Internal Quality Assurance Strategy</i> referenced by the Accreditation Auditor was under review at the time of the Provider Monitoring Visit and had been marked as 'draft'.</p> <p>This document has been replaced by the <i>AFS Quality Assurance Policy</i> which does not include the requirement for new tutors to complete the LBM qualification or hold the certificate.</p> <p>The Training for Trainers training provided by AFS on 4 April 2022 met the requirements for tutors. AFS met all of the obligations for tutors that were appointed to deliver the 2022 courses.</p> <p>Tutor observation is not currently a stipulated requirement for the LBM qualification in the <i>AFS Quality Assurance Policy</i>, but it is something that we do routinely. Tutor observation was completed for two of the three tutors and submitted to the Accreditation</p>	31 May 2023	21 June 2023

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	<i>Assurance Strategy</i> when inducting new tutors.		<p>Auditor. Tutor observation is still required for the third tutor of the LBM qualification.</p> <p><b>Action:</b></p> <ul style="list-style-type: none"> <li>Amend <i>AFS Assessment Methodology</i>, <i>AFS Quality Assurance Policy</i> and <i>AFS Centre Guidance</i> to make clear that Training for Trainers training provided by AFS meets the requirements of the Delivery and Assessment Strategy.</li> <li>Update the <i>AFS Quality Assurance Policy</i> to include tutor observation as one of the criteria for internal quality assurance.</li> <li>Complete tutor observation for third LBM tutor by end May 2023, which will still be within the first year of the tutor providing the training.</li> </ul> <p><b>Evidence to be provided to SQA Accreditation:</b></p> <ul style="list-style-type: none"> <li>Updated <i>AFS Quality Assurance Policy</i>, <i>AFS Assessment Methodology</i>, <i>AFS Centre Guidance</i>.</li> <li>Training for Trainers certificates 2022.</li> <li>Tutor observation records.</li> </ul>		

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4. Principle 13	<p>Provider 1 was unable to provide the Accreditation Auditor with annual Continuous Professional Development (CPD) records for one tutor and one internal verifier.</p> <p>The Accreditation Auditor was therefore unable to confirm that that the provider had complied with the requirements for CPD, as specified in both the <i>Assessment Strategy Licensing Board Members' Qualification</i> (Approved by ACG on 30 March 2022) and the <i>Licensing Board Members' Qualification at</i></p>	Low	<p><b>Action:</b></p> <ul style="list-style-type: none"> <li>Continuous Professional Development (CPD) records are available for the internal verifier and will be sent to the Accreditation Auditor.</li> <li>We are still gathering CPD records for the tutor and these will also be sent to the Accreditation Auditor. It should be noted that records are held on the tutor's qualifications and experience, but the annual CPD return is awaited.</li> </ul> <p><b>Evidence to be provided to SQA Accreditation:</b></p> <ul style="list-style-type: none"> <li>CPD Records for internal verifier and tutor.</li> </ul>	31 March 2023	03/04/2023

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	<i>SCQF level 6: Alcohol Focus Scotland Assessment Methodology</i> (April 2022).				
5. Principle 13	AFS had not quality assured the assessment or delivery of the Licensing Board Members' training courses, including sampling of tutors delivering the training courses. External quality assurance should have been scheduled to take place during the bulk period of delivery of the <i>Licensing Board Members' Qualification</i> . At the time of the provider monitoring activity, AFS had not appointed an External Quality Assurer	Very High	<p>Experienced EV will continue to undertake external quality assurance (EQA). AFS will build EV capacity to ensure resilience.</p> <p><b>Action:</b></p> <ul style="list-style-type: none"> <li>Conduct EQA as per <i>AFS Quality Assurance Policy</i> by end May 2023.</li> </ul> <p><b>Evidence to be provided to SQA Accreditation:</b></p> <ul style="list-style-type: none"> <li>EQA Report 2023 covering the period from 16 December 2020 when the last EQA report was produced until end of March 2023</li> <li>Updated Quality Assurance Policy</li> <li>Confirm additional EV capacity</li> </ul>	30 September 2023	9 August 2023

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	<p>or undertaken any external quality assurance.</p> <p>AFS has not complied with the external quality assurance requirements specified in the <i>Assessment Strategy Licensing Board Members' Qualification</i> (Approved by ACG 30 March 2022).</p>				
6. Principle 14	The <i>Equal Opportunities Policy</i> given to the Accreditation Auditor by Provider 1 prior to the remote provider monitoring activity was aimed at employees instead of candidates.	Low	<p>The Equal Opportunities Policy provided to the Accreditation Auditor clearly states that the policy applies to <b>clients and customers</b> of AFS. We consider candidates on our accredited qualifications to be clients and customers of the organisation, along with a wide range of other stakeholders that we routinely engage with.</p> <p><b>Action:</b></p>	31 March 2023	31 March 2023



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			<ul style="list-style-type: none"> <li>Amend Equal Opportunities Policy to include specific reference to candidates of accredited qualifications.</li> </ul> <p><b>Evidence to be provided to SQA Accreditation:</b></p> <ul style="list-style-type: none"> <li>Amended Equal Opportunities Policy.</li> </ul>		
7. Principle 14	At the time of the remote provider monitoring activity, Provider 1 explained to the Accreditation Auditor that they had been notified of a reasonable adjustment required for the delivery and assessment of the <i>Licensing Board Members' Qualification</i> on 20 June and 23 June 2022. It was for a candidate who was profoundly deaf.	High	<p><b>Action:</b></p> <ul style="list-style-type: none"> <li>AFS will adjust our joining instructions and communications to candidates to ensure that the steps required to access the remote invigilation system are made explicitly clear to all candidates including those requiring reasonable adjustment.</li> <li>AFS will continue to call for improvement from the remote invigilation provider in this regard. AFS has provided feedback on the process and the remote invigilation provider is conducting a review.</li> </ul> <p><b>Evidence to be provided to SQA Accreditation:</b></p> <ul style="list-style-type: none"> <li>Updated joining instructions and written communication pertaining to licensing qualifications.</li> </ul>	31 May 2023	30/06/2023

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	<p>Provider 1 failed to alert the third-party, who deliver the online exam using remote invigilation technology, of the need for a reasonable adjustment for the candidate when the online exam was booked with them. Therefore, the third party was unaware that one of the candidates due to sit the exam on 20 June 2022 had hearing difficulties.</p> <p>The Accreditation Auditor could see no good reason why the online supervisor from the third party had to ask if the learner was deaf or complete a check around his ears, particularly when the third</p>		<ul style="list-style-type: none"> <li>Report on review of process by remote invigilation provider.</li> </ul>		

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	party had confirmed to Provider 1 that their remote invigilation team had been advised of the reasonable adjustment to use the chat box functionality with this candidate who was profoundly deaf. This could have been avoided and any embarrassment or irritation felt by the candidate mitigated.				
8. Principle 15	AFS has not complied with its own timescale for issuing certificates as specified in the <i>AFS Centre Guidance Licensing Board Members' Qualification</i> (April 2022).	Low	Results were provided immediately to candidates via the remote invigilation platform, and on the same day to Local Authorities by the AFS Learning & Development Team.  Ongoing COVID mitigation measures prevented regular attendance at the office to produce certificates within the stipulated timescales.	8 March 2023	08/03/2023

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			<p>All candidates received their certificates in good time, but the key requirement is to confirm the results to the Local Authority, which we achieved in a shorter timescale than in previous peak years.</p> <p><b>Action:</b></p> <ul style="list-style-type: none"> <li>Amend <i>AFS Centre Guidance</i> to reflect the provision of results immediately enabled by the use of a remote invigilation provider.</li> <li>Add information to the <i>AFS Centre Guidance</i> about the potential impact of pandemic restrictions on the timescales for issuing certificates.</li> <li>Confirm in <i>AFS Centre Guidance</i> that certificates will be issued within the 3-month timescale for licensing board member to provide proof to the local authority of their qualification.</li> </ul> <p><b>Evidence to be provided to SQA Accreditation:</b></p> <ul style="list-style-type: none"> <li>Updated <i>AFS Centre Guidance</i>.</li> </ul>		

Action Plan approved by ACG on Wednesday 01 March 2023